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Indirect Purchaser Plaintiffs
Interim Co-Lead Class Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE LITHIUM ION BATTERIES ANTITRUST LITIGATION,	Case No. 13-MD-02420 YGR (DMR) MDL No. 2420
This Documents Relates to: ALL ACTIONS	COMPENDIUM OF SUPPORTING COUNSEL DECLARATIONS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR ATTORNEYS FEES, EXPENSES, AND SERVICE AWARDS Date: July 16, 2019 Time: 2:00pm Judge: Hon. Yvonne Gonzalez Rogers Court: Courtroom 1, 4th Floor DATE ACTION FILED: Oct. 3, 2012

Ex.	Description
1	Declaration of Kenneth L. ("Ken") Mann in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of ADR Office of Attorney Ken Mann, fka ADR Office of Kenneth L. Mann, Esq., dated April 9, 2019
2	Declaration of Kenneth L. Mann, On Behalf of the ADR Office of Kenneth L. Mann, as Arizona Counsel for Christopher Hunt, AZ Proposed IPP Class Representative, in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses, filed May 26, 2017, ECF No. 1813-3
3	Declaration of Jennie Lee Anderson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Andrus Anderson LLP, dated April 18, 2019
4	Declaration of Jennie Lee Anderson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Andrus Anderson LLP, filed May 26, 2017, ECF No. 1813-4
5	Declaration of Eric J. Pickar in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bangs McCullen Law Firm, filed May 26, 2017, ECF No. 1813-5
6	Declaration of Lesley Weaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bleichmar Fonti & Auld, dated April 5, 2019
7	Declaration of Lesley Weaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bleichmar Fonti & Auld, filed May 26, 2017, ECF No. 1813-6
8	Declaration of Whitney E. Street in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Block & Leviton LLP, April 5, 2019
9	Declaration of Whitney E. Street in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Block & Leviton LLP, filed May 26, 2017, ECF No. 1813-7
10	Declaration of Van Bunch in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bonnett, Fairbourn, Friedman & Balint, P.C., dated April 5, 2019
11	Declaration of Van Bunch in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bonnett, Fairbourn, Friedman & Balint, P.C., filed May 26, 2017, ECF No. 1813-8
12	Declaration of Daniel E. Birkhaeuser in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bramson, Plutzik, Mahler & Birkhaeuser, filed May 26, 2017, ECF No. 1813-9

Ex.	Description
13	Declaration of J. Gerard Stranch, IV in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Branstettler, Stranch & Jennings, PLLC, filed May 26, 2017, ECF No. 1813-10
14	Declaration of Joseph M. Breall in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Breall & Breall, LLP, dated March 26, 2019
15	Declaration of Joseph M. Breall in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Breall & Breall, LLP, filed May 26, 2017, ECF No. 1813-11
16	Declaration of Jennifer W. Sprengel in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cafferty Clobes, Meriwether & Sprengel LLP, dated April 4, 2019
17	Declaration of Bryan L. Clobes in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cafferty Clobes, Meriwether & Sprengel LLP, filed May 26, 2017, ECF No. 1813-12
18	Declaration of Laura Alexander in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cohen Milstein Sellers & Toll PLLC, dated April 11, 2019
19	Declaration of Brent W. Johnson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cohen Milstein Sellers & Toll PLLC, filed May 26, 2017, ECF No. 1813-13
20	Declaration of Katherine Van Dyck in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cuneo, Gilbert & LaDuca, LLP, dated April 12, 2019
21	Declaration of Katherine Van Dyck in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cuneo, Gilbert & LaDuca, LLP, filed May 26, 2017, ECF No. 1813-14
22	Declaration of John G. Emerson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Emerson Scott, LLP, filed May 26, 2017, ECF No. 1813-15
23	Declaration of Brian D. Penny in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Goldman Scarlato & Penny, P.C., dated March 28, 2019
24	Declaration of Brian D. Penny in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Goldman Scarlato & Penny, P.C., filed May 26, 2017, ECF No. 1813-16

Ex.	Description
25	Declaration of Robert S. Green in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Green & Noblin, P.C., April 10, 2019
26	Declaration of Robert S. Green in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Green & Noblin, P.C., filed May 26, 2017, ECF No. 1813-17
27	Declaration of Judd B. Grossman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Grossman LLP, dated April 5, 2019
28	Declaration of Judd B. Grossman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Grossman LLP, filed May 26, 2017, ECF No. 1813-18
29	Declaration of Daniel R. Karon in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Karon LLC, dated March 28, 2019
30	Declaration of Daniel R. Karon in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Karon LLC, filed May 26, 2017, ECF No. 1813-19
31	Declaration of Eric A. Grover in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Keller Grover LLP, dated April 12, 2019
32	Declaration of Eric A. Grover in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Keller Grover LLP, filed May 26, 2017, ECF No. 1813-20
33	Declaration of Mark A Griffin in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Keller Rohrback L.L.P., filed May 26, 2017, ECF No. 1813-21
34	Declaration of Robert J. Gralewski, Jr. in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Kirby McInerney LLP, dated April 5, 2019
35	Declaration of Robert J. Gralewski, Jr. in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Kirby McInerney LLP, filed May 26, 2017, ECF No. 1813-22
36	Declaration of Ralph B. Kalfayan in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Krause, Kalfayan, Benink & Slavens, LLP, dated April 1, 2019
37	Declaration of Ralph B. Kalfayan in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Krause, Kalfayan, Benink & Slavens, LLP, filed May 26, 2017, ECF No. 1813-23

Ex.	Description
38	Declaration of Casey L. Lott in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Langston & Lott, filed May 26, 2017, ECF No. 1813-24
39	Declaration of George Rikos in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Law Offices of George Rikos, filed May 26, 2017, ECF No. 1813-25
40	Declaration of William M. Straus in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of The Law Office of William M. Straus, dated April 5, 2019
41	Declaration of William M. Straus in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of The Law Office of William M. Straus, filed May 26, 2017, ECF No. 1813-26
42	Declaration of Eric S. Somers in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Lexington Law Group, dated April 17, 2019
43	Declaration of Eric S. Somers in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Lexington Law Group, filed May 26, 2017, ECF No. 1813-27
44	Declaration of Peggy Wedgworth in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Milberg LLP, dated April 5, 2019
45	Declaration of Peggy Wedgworth in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Milberg LLP, filed May 26, 2017, ECF No. 1813-28
46	Declaration of Craig M. Nicholas in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Nicholas & Tomasevic, LLP, dated April 18, 2019
47	Declaration of Craig M. Nicholas in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Nicholas & Tomasevic, LLP, filed May 26, 2017, ECF No. 1813-29
48	Declaration of Jeremy A. Lieberman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Pomerantz LLP, dated April 9, 2019
49	Declaration of Jeremy A. Lieberman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Pomerantz LLP, filed May 26, 2017, ECF No. 1813-30
50	Declaration of Marc G. Reich in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Reich Radcliffe & Hoover LLP, dated April 9, 2019

Ex.	Description
51	Declaration of Marc G. Reich in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Reich Radcliffe & Hoover LLP, filed May 26, 2017, ECF No. 1813-31
52	Declaration of Steve Cikes in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Renne Public Law Group and Sloan Sakai Yeung & Wong LLP, dated April 11, 2019
53	Declaration of Steve Cikes in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Renne Sloan Holtzman Sakai LLP, filed May 26, 2017, ECF No. 1813-32
54	Declaration of Alexandra S. Bernay in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Robbins Geller Rudman & Dowd LLP, dated March 26, 2019
55	Declaration of Alexandra S. Bernay in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Robbins Geller Rudman & Dowd LLP, filed May 26, 2017, ECF No. 1813-33
56	Declaration of Jason H. Kim in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Schneider Wallace Cottrell Konecky Wotkyns, filed May 26, 2017, ECF No. 1813-34
57	Declaration of Willem F. Jonckheer in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Schubert Jonckheer & Kolbe LLP, filed May 26, 2017, ECF No. 1813-35
58	Declaration of Daryl F. Scott in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Scott+Scott, Attorneys at Law, LLP, dated April 11, 2019
59	Declaration of Daryl F. Scott in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Scott+Scott, Attorneys at Law, LLP, filed May 26, 2017, ECF No. 1813-36
60	Declaration of Gregory P. Forney in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Shaffer Lombardon Shurin, filed May 26, 2017, ECF No. 1813-37
61	Declaration of Nathan M. Cihlar in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Straus & Boies, LLP, dated April 5, 2019
62	Declaration of Nathan M. Cihlar in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Straus & Boies, LLP, filed May 26, 2017, ECF No. 1813-38

Ex.	Description
63	Declaration of Steven G. Sklaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Susman Godfrey L.L.P. , dated April 5, 2019
64	Declaration of Steven G. Sklaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Susman Godfrey L.L.P., filed May 26, 2017, ECF No. 1813-40
65	Declaration of Jon A. Tostrud in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Tostrud Law Group, P.C., filed May 26, 2017, ECF No. 1813-41
66	Declaration of E. Kirk Wood in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Wood Law Firm, LLC, filed May 26, 2017, ECF No. 1813-42
67	Declaration of James F. Wyatt, III in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Wyatt & Blake, LLP, dated April 4, 2019
68	Declaration of James F. Wyatt, III in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Wyatt & Blake, LLP, filed May 26, 2017, ECF No. 1813-43

EXHIBIT 1

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ATTORNEY KENNETH L ("KEN") MANN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ADR OFFICE OF ATTORNEY KEN MANN *fka* ADR OFFICE OF KENNETH L MANN, ESQ.**

I, Kenneth L. Mann, *aka* Ken Mann, declare:

1. At all relevant times herein since his involvement in this litigation in 2013, I have been Counsel for Christopher Hunt, individually and as a Class Representative for the Arizona Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action . During that time, I have practiced law (as well as served as an arbitrator, mediator, and court special master) as a sole proprietor, with no partners, associates, paralegals, etc., and I currently practice as "ADR Office of Attorney Ken Mann"("my firm"). I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge, and if called as a witness, I could and would competently testify to the matters stated herein.

2. The updated background and experience of the undersigned is summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. My firm has prosecuted this litigation solely on a contingent fee basis and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While my firm has devoted substantial time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, my firm performed the following work: As more particularly described in my firm's invoices previously submitted herein (ECF No. 1813-3). and updated this date to April 1, 2019, as discussed below and on **Exhibit B-1** hereto, I have monitored these proceedings since my retention in this case, kept Arizona IPP Class Representative, Christopher Hunt, advised thereof, and otherwise communicated with him and with IPP Co-Lead counsel as needed -- including, without limitation, assisting Christopher Hunt in responding to requests for information and documents from Co-Lead counsel, defendants' requests for production, responses to defendants' interrogatories, preparing Christopher Hunt for his deposition, attending his deposition, reviewing the transcript of his deposition, conferring with him regarding errata thereon, reviewing and discussing with him and Co-Lead Counsel regarding proposed settlements and the status of this litigation as needed, communicating with Co-Lead

counsel as requested, etc. Attached hereto as **Exhibit B-2** is a billing summary of my firm's total hours and lodestar rate from March 1, 2017 to present -- of 4.3 hours at $300 per hour, respectively = $1,290.00 -- which rate is identical both to my current and my historical billing rate on this litigation since 2013 (as previously shown in Exhibit C of ECF No. 1813-3). This summary and the attached invoice at **Exhibit B-1** reflecting the details thereof were prepared by me from contemporaneous emails, letters, court filings, conferences, etc., that were regularly received, reviewed, prepared, sent, or participated in with client and/or Co-Lead counsel, as applicable, and the relevant documents maintained by my firm; and the invoices only include my services rendered in connection with and in response to requests for said services from Co-Lead counsel.

5. A summary of work performed by my firm, and detailed billing records from June 1, 2013 to February 28, 2017, were previously submitted to the Court with my Declaration in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on behalf of my firm, and filed on May 26, 2017. (ECF No. 1813-3). My firm did not and does not seek attorneys' fees for any time prior to the appointment of Co-Lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of billable hours on this matter spent by the ADR Office of Attorney Ken Mann since June 1, 2013 to date is 103.8 hours [99.5 hours + 4.3 hours] with a corresponding lodestar based on current rates of $300 per hour is$31,140 [$29,850.00 + $1,290.00 = $31,140].

7. Attached hereto is a true copy of my **Exhibit E** that was filed herein as ECF #1813-3, page 39 on May 26, 2017, which sets forth $48.75 of unreimbursed costs and expenses incurred by my firm as of that date on behalf of the IPPs in connection with the prosecution of this case, and which remain unreimbursed to date. This amount is being reduced to $24.00 as explained in Exhibit E. The expenses reflected in Exhibit E were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported herein by the ADR Office Of Attorney

Ken Mann in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 8, 2019 at Scottsdale, Arizona.

/s/ Ken Mann

Kenneth L. ("Ken") Mann

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

EXHIBIT A -------C.V. / RÉSUMÉ OF KENNETH I. MANN

ADR OFFICE OF ATTORNEY KEN MANN
6822 North 72nd Place, Scottsdale, AZ 85250
www.reasonablemann.com
Phone: 480.789.1025 Email: ken@reasonablemann.com

OVERVIEW

●Peer Review: AV Preeminent® (www.martindale.com) ; Member, National Academy of Distinguished Neutrals (www.nadn.org); Sustaining Member, Arizona's Finest Lawyers (www.azfinestlawyers.org).

● Seasoned Mediator, Arbitrator, Court Special Master, Jury Trial and Appellate Litigator in Disputes Involving:

*Alleged Business and Statutory Torts, *e.g.*, Securities, Real Estate, Consumer, and Other Fraud, Wrongful Discharge/ADA/ADEA, Defamation, Tortious Interference, Legal Malpractice, Civil Theft, etc.

*Bankruptcy, *e.g.*, Fraudulent and Preferential Transfers, Discharge/Dischargeability, etc.

*Commercial Transaction Controversies and Shareholder/Partner/LLC Member Disputes.

*Executive Employment Contracts.

*Real Estate Sales, Mortgages, Leases, Sale/Leasebacks, Development, Construction, Eminent Domain, etc.

*Estates, Trusts, Taxes – Will, Trust and Guardianship Contests; Incapacity; Undue Influence; IRS, etc.

*Civil Racketeering Seizures, Forfeitures, etc.

*Receiverships

*ESI Discovery Issues

*Valuation Disputes on Real Estate, Businesses, Professional Practices, Buy-Sell and Redemption Agreements, etc.

●Former CPA (FL and NC) prior to law school. Audit Senior with Price Waterhouse (Miami Office), primarily on two publicly held mortgage and equity portfolio REIT's and a privately held Florida securities broker-dealer.

●More Than Fifteen Published Opinions (See "State and Federal Published Opinions" below).

● Former Certified (FL) Civil Trial & Appellate Mediator and AZ Superior Court JPT/Settlement Officer.

● Member, American Arbitration Association's Commercial Mediation Panel & FINRA's Mediation Panel, including securities industry employment disputes; Appointed to mediate 150-200 sophisticated financial disputes, *e.g.*:

*Alleged business, real estate & securities fraud, varied employment law disputes, alleged breach of fiduciary duty, legal malpractice, and other business torts.

*Consumer class action.

*Franchise disputes, including civil rights claim, and other contract disputes.

*Ad valorem taxes.

*Bankruptcy adversary proceedings.

*Real estate contracts, leases, zoning, eminent domain, etc.

*Estates and trusts.

*Insurance disputes – personal injury claims; workers' comp rate classifications, etc.

●Arbitrator, American Arbitration Association's Large, Complex Commercial Case Panel and FINRA's Arbitration Panel, including employment disputes. Appointed to over 100 complex cases, *e.g.*:

*Chaired five statewide insurance rate binding arbitration proceedings (Selected as the neutral chair by insurors and Florida Dept. of Financial Regulation (*fka* Dept. of Insurance).

*Alleged fraud, tortious interference, and other business torts.

*Franchise agreements.

*Co-owners' disputes over buy-sell agreements, valuation disputes, alleged fraud, fiduciary duty breaches, etc.

*Varied real estate, professional practices, & other business purchase & sale agreements and ancillary documents.

*Requirements contracts.

*Executive employment contracts.

*First-party and third-party insurance policy disputes, including life insurance and disability policies.

*ESI (electronically stored information) and other discovery disputes.

● Former Special Counsel (Litigation) For Bankruptcy Trustee.

● Transactional Law and Workout Experience.

● Expert Consulting/Testifying Witness Experience - On Legal Ethics, Legal Malpractice, and Fee Disputes.

EMPLOYMENT HISTORY

*ADR Office of Attorney Ken Mann, formerly, ADR Office of Kenneth L. Mann, Scottsdale, AZ March 2010 to date (absent potential conflicts and during vacations, etc. during Oct. 2011- 2012 while court counsel).
*Court Counsel, State of Arizona Superior Court in Maricopa County, October 2011-- October 2012.
*Arizona Assistant Attorney General-Criminal Division/ Financial Remedies Section (civil RICO seizures and forfeitures), Phoenix, AZ January 2009--February 2010.
*Non-equity Member - Beus Gilbert, PLLC, Scottsdale (mostly securities litigation) October 2005--December 2008.
*Founder & Sole Shareholder-Kenneth L. Mann, P.A., Orlando, FL 1997--2005 & 1982--1993.
Of Counsel (1991-1993) and Shareholder - Trickel, Leigh & Mann, P.A., Orlando, FL (*Deceased, Feb. 1996) 1994—1997.
* Shareholder - Subin, Shams, Rosenbluth & Moran, P.A., Orlando, FL 1974—1982.
*Associate - Deutsch, Deutsch, Goldberg & Young, P.A., Ft. Lauderdale, FL 1973—1974.
*Audit Senior - Price Waterhouse & Co., Miami, FL 1966—1970.

EDUCATION

* J.D., *magna cum laude*, Mercer University, Macon, GA, 1973; Valedictorian; Editor-in-Chief, Mercer Law Review (1972--1973); Intra-State Moot Court Champion Team (1972)(defeating Emory and U. of Georgia).
* B.S. in Bus. Admin., U. of N. Carolina, Chapel Hill, 1966. Order of the Old Well (honorary society).

LICENSURE

*Member, Arizona Bar (2005) and Florida Bar (1973) (Among top four scores of approximately 900 candidates on Florida Bar exam).
*Admitted to practice before: U.S. Supreme Court; U.S. Courts of Appeals, 2nd, 9th (2005), and 11th Circuits; 9th Circuit Bankruptcy Appellate Panel; U.S. District Courts: District of Arizona (2005), Middle District of Florida; U.S. Tax Court; U.S. Court of Federal Claims.
*ADR Panels, Bankr. D. AZ (Phx. Div.); Former Certified Civil & Appellate (FL) Mediator (voluntary non-renewals).
*Former CPA (Florida and North Carolina) (voluntary non-renewals).

STATE AND FEDERAL PUBLISHED OPINIONS

**Patton v. Kera Technology, Inc.*, 895 So.2d 1175 (Fla. 5th DCA 2005), *rev. granted*, 912 So.2d 318(Fla. 2005)
**Campellone v. Cragan*, 910 So.2d 363 (Fla. 5th DCA 2005)
**Magnolia Manor, Inc. v. Siegel*, 866 So.2d 142 (Fla. 5th DCA 2004)
**In re Inman*, 260 B.R. 233 (Bankr. M.D. Fla. 2000)
**Florida Dept. of Revenue v. Race*, 743 So.2d 169 (Fla. 5th DCA 1999)
**Bryan v. Clayton & McCulloh*, 698 So.2d 1236 (Fla. 5th DCA 1997), *rev. denied*, 707 So.2d 1123 (Fla. 1998), *cert. denied*, 524 U.S. 933 (1998), *after remand*, 753 So.2d 632 (Fla. 5th DCA 2000)
**Peck v. Delta Fire Sprinkler, Inc.*, 675 So.2d 711 (Fla. 5th DCA 1996)
**C&W Leasing, Inc. v. Orix Credit Alliance, Inc.*, 957 F.2d 815 (11th Cir. 1992)
**In re Siefert*, 130 B.R. 607 (Bankr. M.D. Fla. 1991)
**In re Walsh*, 123 B.R. 925 (Bankr. M.D. Fla. 1991)
**Barden v. Pappas*, 532 So.2d 707 (Fla. 5th DCA 1988), after remand, 565 So.2d 755 (Fla. 5th DCA 1990)
**Jones v. Orlando Second Car Center*, 30 Fla. Supp.2d 105 (Fla. 9th Cir. 1988)
**Winterbotham v. Computer Corps, Inc.*, 490 So.2d 1282 (Fla. 5th DCA 1986)
**Holland v. Hattaway*, 438 So.2d 456 (Fla. 5th DCA 1983)
**Zirot v. Gilmer*, 336 So.2d 680 (Fla. 4th DCA 1976)

PUBLICATIONS

* "12 Advocacy Tips For Mediation," Arizona ADR Forum 3, Fall 2014 , State Bar of Arizona ADR Section
* "CPAs and Mediation," AZCPA 13 (July/August 2011).
* "ADR is Useful in Handling Wills & Trusts," DISPUTE RESOLUTION TIMES, American Arbitration Association (Summer 1997).
* "Creditor's Attorney Chokes on Heintz Schtick Maneuver," XIX ACTIONLINE, Florida Bar Real Property, Probate & Trust Law Section (September/October 1995).
* "The Attractive Nuisance in Georgia, A Plea for Its Reincarnation," 23 MERCER LAW REVIEW 431 (1972).

PRESENTATIONS

*Presenter at over 30 lectures and CLE seminars, including:

In Arizona: "The Ins & Outs of Family Business Negotiations: Ways to Handle Dissolution, Intergenerational & Family Business Buy-Out Transactions & Disputes," Maricopa County Association of Family Mediators; "Deal Points One Must Understand To Effectively Mediate Business Break-Ups," Arizona Bar ADR Section; "Oral Advocacy in Mediations," Thurgood Marshall Inn of Court, Phoenix; "Recommended Mediation Do's And Don'ts For Advocates - From a Mediator's Point of View," Arizona Bar Real Property Section (Regarding troubled commercial mortgage loans);
In Florida: To members of: the Florida Bar; Orange County (FL) Bar; Marion County and Seminole County Inns of Court; Attorneys Title Insurance Fund (to annual conventions of approximately 900 attendees); U. of Miami annual real estate symposium (approximately 200 attendees); Central Florida Tax Roundtable; Florida Institute of CPA's; Civic groups; and public television. Topics included: mediation and arbitration; real estate fraud; bankruptcy discharge & dischargeability litigation; consumer law, *e.g.*, Fair Debt Collection Practices Act; ethics, professionalism, and legal malpractice; major probate, tax, and business legislation; estate planning; will drafting; tax issues in divorce, etc.

PRIMARY PROFESSIONAL SERVICE ACTIVITIES

In Arizona:

*Member, Executive Council, State Bar of Arizona ADR Section, July 2014 -- 2016.
*Member, Executive Bd. (President-Elect 2015-16, President 2016-17) Arizona Association for Conflict Resolution.
*Member, State Bar of Arizona UPL Committee, 2013 – 2016.
*Volunteer Attorney Member & Settlement Officer, Arizona Supreme Court Attorney Discipline Hearing Panels, 2011 -- Present.
*Volunteer Settlement Officer & Judge *Pro Tem*, Superior Court in Maricopa County, 2011—2014.
*Arizona Attorney General's Office Ethics Committee, 2009 –2010.
*Director, Scottsdale Bar Association, 2011.
* Member (2007--2013) and Volunteer Arbitrator, State Bar of Arizona Fee Arbitration Committee, 2007—2014.
*Volunteer Judge, New York City Bar 61st National Moot Court Competition Regionals, Nov. 2010.
*Volunteer Mediator, ABA Law Student Representation in Mediation Competition Regionals, Feb. 2010.

In Florida:

*Florida Bar Professional Ethics Committee (Chair, 1996--1997), 1993—2005.
*Barry U. of Orlando School of Law, Adjunct Faculty (For Professor on Sabbatical -- taught Professional Responsibility, which includes Legal Ethics), 2000.
*Florida Bar Special Committee on Unbundled Legal Services, 2003—2005.
*Florida Bar 9th Circuit Grievance Committee "D" (Chair, 1996--1997), 1994—1997.
*Florida Bar UPL Standing Committee (Vice Chair 1986--1988) 1981—1988.
*Florida Bar Clients Security Fund Committee (re clients whose attorneys had embezzled trust funds)1983 -- 1986.
*Orange County Bar Law Week Committee (Chair) 1985—1986.

PRIMARY COMMUNITY SERVICE ACTIVITIES

* Mentor, Arizona Association of Conflict Resolution's Annual Youth Peer Mediation Conferences, 2014 & 2016
*Director (President 2011) of my HOA, 2011-- February 2014.

In Florida

*Director, Seminole State College of Florida (*fka* Seminole Community College) Foundation, Inc., 1998—2005.
*Rotary, Seminole County South (Director, 1994--1997 and Paul Harris Fellow Award), 1977—2002.
*Member, City of Maitland Franchise Review Committee, 1995 --2000 (*esp*. electricity franchise renewal vs. RFP's).
*Volunteer Advisor and Judge, Orange County (FL) Bar Association Teen Court, 1995 & 2000.
*Director, Holocaust Memorial Resource & Education Center of Central Florida, Inc., 1982 --1994.
*Volunteer Mediator, Orange County Bar Association Citizen Dispute Settlement Program, 1978 --1996.
*Member, Business Advisory Board, Orange County Public Schools, 1994 --1996.
*Volunteer Instructor, Junior Achievement, 1993 --1995.
*Volunteer Attorney, Orange County Bar Ass'n. Legal Aid Society's Homeless Advocacy Project, 1992—1993.

EXHIBIT B-1

ADR Office of Attorney Ken Mann
6822 N. 72nd Place
Scottsdale, AZ 85250
(480) 789-1025

Ken@reasonablemann.com
www.reasonablemann.com

Exhibit B-1

Invoice #
307

4/7/2019

Jennie Lee Anderson, Esq.
Liaison Counsel for Indirect Purchasers
Andrus Anderson LLP
Jennie Anderson(jennie@andrusanderson.co
Kelli Good (kelli.good@andrusanderson.com

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
6/25/2018	Receive, review, and respond to email from lead counsel re [redacted] with questions, and, subject to satisfactory responses, [redacted] AZ IPP Class Representative, Chris Hunt,	1.1	300.00	330.00
6/26/2018	Receive, review, and respond to lead counsel's answers to inquiries; email AZ IPP Class Rep.,Chris Hunt, with [redacted]; receive and review Chris' email [redacted]	0.5	300.00	150.00
7/23/2018	Receive and review email from lead counsel re [redacted] email to AZ IPP Class Rep., Chris Hunt, advising [redacted]	0.2	300.00	60.00
7/24/2018	Emails to and from lead counsel to try to schedule conference re [redacted]	0.2	300.00	60.00
7/26/2018	Conference w/lead counsel re [redacted] posing additional questions, and suggesting [redacted]	0.1	300.00	30.00

	Total
	Payments/Credits
	Balance Due

ADR Office of Attorney Ken Mann
6822 N. 72nd Place
Scottsdale, AZ 85250
(480) 789-1025

Ken@reasonablemann.com
www.reasonablemann.com

Invoice #
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4/7/2019

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ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
7/27/2018	Conference with Chris Hunt to update him; email to lead counsel [redacted] etc.; receive, review and cc to Chris Hunt, response from lead counsel [redacted]	0.7	300.00	210.00
11/17/2018	Receive, review, and respond with questions on email from lead counsel re [redacted]	0.4	300.00	120.00
11/18/2018	Receive, review, and forward email response from lead counsel to our questions on [redacted]	0.4	300.00	120.00
11/19/2018	Conference with Chris Hunt and prepare his [redacted]	0.4	300.00	120.00
11/20/2018	Receive, review, and forward to lead counsel, Chris Hunt's [redacted]	0.3	300.00	90.00

Total	$1,290.00
Payments/Credits	$0.00
Balance Due	$1,290.00

EXHIBIT B-2

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

ADR Office of Attorney Ken Mann

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Name (P)															0.00	$0.00	$0.00
Ken Mann											4.30				4.30	$300.00	$1,290.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.30**	**0.00**	**0.00**	**0.00**	**4.30**		**$1,290.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.30**	**0.00**	**0.00**	**0.00**	**4.30**		**$1,290.00**

EXHIBIT E

NAME: ADR Office of Ken Mann
for Az IPP Chris Hunt

EXHIBIT E

IN RE: LITHIUM ION BATTERIES INDIRECT
KEN MANN CUMULATIVE MONTHLY COSTS REPORT
THROUGH FEBRUARY 28, 2017

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				$0.00
Court Costs				$0.00
Experts/consultants				$0.00
~~Federal Express~~	~~Oct-14~~	~~$24.75~~	~~*~~	~~$24.75~~
Hearing Transcripts				$0.00
Investigation				$0.00
Lexis/westlaw				$0.00
Messenger/delivery				$0.00
Photocopies - in House				$0.00
Photocopies - Outside				$0.00
Postage				$0.00
Service of Process				$0.00
Special Supplies				$0.00
Telephone/telecopier				$0.00
Travel (Parking)	For client's depo	$24.00		$24.00
Miscellaneous				$0.00
TOTAL		~~$48.75~~	~~$0.00~~	~~$48.75~~
AMENDED TOTAL		$24.00 *		$24.00*

*This Amended total as of April 16, 2019 is due to my discovery last week -- in connection with the current filing -- that I have misplaced the proof of payment on my September 30, 2014 overnight shipment via Federal Express of important relevant documents herein to IPP Class Counsel at Cotchett , Pitre & McCarthy, LLP; and FedEx has failed to respond to my request to search for and provide another copy. My September 30, 2014 services , cover letter, and shipment that day via FedEx for next day (October 1, 2014) delivery were reflected in my September 30, 2014 time entry on October 10, 2014 Invoice (# 177 Amended), previously filed herein.

However, lead counsel have advised me that under the Court's guidelines for reimbursement of expenditures, they understand my September 30, 2014 time entry on my October 10, 2014 invoice #177 is insufficient substantiation of my $24.75 payment to FedEx -- and even if I were to also provide a copy of that portion of my September 30, 2014 cover letter addressed to the Cotchett firm that corroborates my shipment of documents for this litigation via FedEx for next day delivery regarding Arizona IPP Class Representative Chris Hunt.

EXHIBIT 2

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF KENNETH L. MANN, ON BEHALF OF THE ADR OFFICE OF KENNETH L. MANN, AS ARIZONA COUNSEL FOR CHRISTOPHER HUNT, AZ PROPOSED IPP CLASS REPRESENTATIVE, IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Kenneth L. Mann, declare:

1. I am a sole practitioner doing business as ADR Office of Kenneth L. Mann ("I" or "the Declarant"). Aside from this litigation and a few *pro bono* matters, my legal practice has primarily focused since November 2012 on serving as a neutral – more specifically, as an arbitrator, mediator, and discovery special master in disputes pending or threatened before the American Arbitration Association, FINRA, or the Superior Court in and for Maricopa County, respectively. Herein, I am Arizona Counsel for Christopher Hunt, one of the two proposed Arizona Indirect Purchaser Plaintiffs' ("IPPs" or "Plaintiffs") Class Representatives in this action. I submit this declaration in support of the IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge, and if called as a witness, I could and would competently testify to the matters stated herein.

2. The Declarant has served as counsel to Christopher Hunt in his above representative capacity and as counsel for the IPPs throughout the course of this litigation since late June 2013. My background and experience are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. The Declarant has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants.

4. During the pendency of the litigation, the Declarant has performed the following work:

(i) He educated himself and Christopher Hunt about the nature and scope of the antitrust violations alleged herein; and, in keeping with his ethical obligations to his client as an Arizona IPP proposed class representative, he sought to stay reasonably informed and abreast of the progress of the litigation by reviewing filings herein that had or reasonably appeared to have a potential positive or negative impact upon the IPP's --

while at the same time, not "piling on" or "churning" unnecessary and unproductive hours.

(ii) He worked with Christopher Hunt and co-lead counsel to develop the facts substantiating Chris Hunt's qualifications to be an IPP class representative herein, including but not limited to establishing: Mr. Hunt's educational background and communication skills; his standing; his proof of purchase as an indirect purchaser of items containing one or more lithium ion batteries or battery cells; Mr. Hunt's diligence and conscientiousness in fulfilling his duties as a class representative in: cooperating in a timely fashion with the Declarant and with plaintiffs' lead counsel herein in discovery of records, in preparation for and availability for his deposition, in reviewing the transcript of his all-day deposition, attending and actively participating in conferences with the Declarant, lead counsel and their technology consultants as needed, etc.

5. Attached hereto as **Exhibit B** is a billing summary of the Declarant's 99.5 net billable hours,[1] and a lodestar of $300 per hour for the entire period of my representation, for a total lodestar fee of $29,850.00 before any enhancement, if any. The lodestar rate was determined using the Declarant's historical rate of $300 per hour during the period from the undersigned's retention in this litigation in June 2013 after this Court's Order dated May 17, 2013 (ECF No. 194)) to February 28, 2017.[2] A detailed time compilation is attached as Exhibit D.

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[1] /after deduction of hours by co-lead counsel for services deemed unnecessary.

[2] /The undersigned recognizes his billing rate is much lower than his background and legal experience since 1973 would suggest. Indeed, more than ten years ago, during 2005-2008, and even though a newcomer to Arizona at the time, his billing rate was $350 per hour while primarily litigating securities fraud disputes as a new Arizonan and non-equity member of Beus Gilbert, PLLC, Scottsdale, AZ). However, the ADR field has been exceedingly competitive in metropolitan Phoenix, especially for relative newcomers, following the Great Recession. Accordingly, because one's overhead is typically lower and more controllable when focusing on serving as a neutral versus a (footnote continued)

6. The lodestar amount reflected in Exhibit B is primarily for work assigned by Lead Counsel and secondarily includes minimal, intermittent legal services the Declarant deemed necessary and appropriate in order to be able to fulfill in good faith my professional and ethical responsibilities to my client, Christopher Hunt, in his capacity as a proposed Arizona IPP Class Representative from the time of our involvement in this litigation in June 2013 to the current date. This billing summary was prepared from invoices this Declarant generated and maintained from time records regularly prepared by the Declarant, as amended to eliminate hours that co-lead counsel deemed unnecessary.

7. Attached as **Exhibit C** is your Declarant's schedule of hourly rates billed by the ADR Office of Kenneth L. Mann herein for all timekeepers from June 2013 through February 28, 2017

8. Attached as **Exhibit D** is a compilation of the invoices summarized on **Exhibit B**.

9. Attached hereto as **Exhibit E** is a summary of the expenses the ADR Office of Kenneth L. Mann has incurred during this litigation in connection with the prosecution of this case, in the aggregate amount of $48.75, none of which are ordinary and necessary routine copying or similar overhead expenses. Specifically, they consist of:

(a) $24.75 the Declarant paid on a FedEx shipment to co-lead counsel in October 2014 (of a lengthy cover letter from the Declarant and key documents produced by his client, IPP Arizona putative class action representative, Christopher Hunt); and

(b) $24 the Declarant paid for parking at the office building where Mr. Hunt's all-day deposition occurred. on February 4, 2016. This office incurred these expenses on

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primarily litigation or transactional practice, the Declarant has chosen to maintain a highly competitive billing rate and to let some of that overhead savings inure to those who utilize his services.

behalf of the IPPs on a contingent basis and has not been.reimbursed. The expenses reflected in Exhibit D were prepared from expense vouchers, receipts, invoices, and/or bank records, and thus represent an accurate recordation of the expenses incurred.

10. The Declarant has reviewed the time and expenses reported by the ADR Office of Kenneth L. Mann in this case which are included in this declaration, and the Declarant affirms that they are true and accurate.

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

Executed on the 26th day of May, 2017 at Scottsdale, Arizona.

Ken Mann Digitally signed by Ken Mann
Date: 2017.05.26 12:39:01 -07'00'

Kenneth L. ("Ken") Mann

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

RÉSUMÉ OF KENNETH L. ("KEN") MANN
ADR OFFICE OF KENNETH L. MANN

6822 North 72nd Place, Scottsdale, AZ 85250
www.reasonablemann.com
Phone: 480.789.1025 Email: ken@reasonablemann.com

OVERVIEW

●Peer Review: AV Preeminent® (www.martindale.com) ; Member, National Academy of Distinguished Neutrals (www.nadn.org); Sustaining Member, Arizona's Finest Lawyers (www.azfinestlawyers.org).

● Seasoned Mediator, Arbitrator, Court Special Master, Jury Trial and Appellate Litigator in Disputes Involving:
*Alleged Business and Statutory Torts, *e.g.*, Securities, Real Estate, Consumer, and Other Fraud, Wrongful Discharge/ADA/ADEA, Defamation, Tortious Interference, Legal Malpractice, Civil Theft, etc.
*Bankruptcy, *e.g.*, Fraudulent and Preferential Transfers, Discharge/Dischargeability, etc.
*Commercial Transaction Controversies and Shareholder/Partner/LLC Member Disputes.
*Executive Employment Contracts.
*Real Estate Sales, Mortgages, Leases, Sale/Leasebacks, Development, Construction, Eminent Domain, etc.
*Estates, Trusts, Taxes – Will, Trust and Guardianship Contests; Incapacity; Undue Influence; IRS, etc.
*Civil Racketeering Seizures, Forfeitures, etc.
*Receiverships
*ESI Discovery Issues
*Valuation Disputes on Real Estate, Businesses, Professional Practices, Buy-Sell and Redemption Agreements, etc.

●Former CPA (FL and NC) prior to law school. Audit Senior with Price Waterhouse (Miami Office), primarily on two publicly held mortgage and equity portfolio REIT's and a privately held Florida securities broker-dealer.

●More Than Fifteen Published Opinions (See "State and Federal Published Opinions" below).

● Former Certified (FL) Civil Trial & Appellate Mediator and AZ Superior Court JPT/Settlement Officer.

● Member, American Arbitration Association's Commercial Mediation Panel & FINRA's Mediation Panel, including securities industry employment disputes; Appointed to mediate 150-200 sophisticated financial disputes, *e.g.*:
*Alleged business, real estate & securities fraud, varied employment law disputes, alleged breach of fiduciary duty, legal malpractice, and other business torts.
*Consumer class action.
*Franchise disputes, including civil rights claim, and other contract disputes.
*Ad valorem taxes.
*Bankruptcy adversary proceedings.
*Real estate contracts, leases, zoning, eminent domain, etc.
*Estates and trusts.
*Insurance disputes – personal injury claims; workers' comp rate classifications, etc.

●Arbitrator, American Arbitration Association's Large, Complex Commercial Case Panel and FINRA's Arbitration Panel, including employment disputes. Appointed to over 100 complex cases, *e.g.*:
*Chaired five statewide insurance rate binding arbitration proceedings (Selected as the neutral chair by insurors and Florida Dept. of Financial Regulation (*fka* Dept. of Insurance).
*Alleged fraud, tortious interference, and other business torts.
*Franchise agreements.
*Co-owners' disputes over buy-sell agreements, valuation disputes, alleged fraud, fiduciary duty breaches, etc.
*Varied real estate, professional practices, & other business purchase & sale agreements and ancillary documents.
*Requirements contracts.
*Executive employment contracts.
*First-party and third-party insurance policy disputes, including life insurance and disability policies.
*ESI (electronically stored information) and other discovery disputes.

● Former Special Counsel (Litigation) For Bankruptcy Trustee.
● Transactional Law and Workout Experience.
● Expert Consulting/Testifying Witness Experience - On Legal Ethics, Legal Malpractice, and Fee Disputes.

EMPLOYMENT HISTORY

*ADR Office of Kenneth L. Mann, Scottsdale, AZ March 2010 to date (absent potential conflicts and during vacations, etc. while court counsel).
*Court Counsel, State of Arizona Superior Court in Maricopa County, October 2011-- October 2012.
*Arizona Assistant Attorney General-Criminal Division/ Financial Remedies Section (civil RICO seizures and forfeitures), Phoenix, AZ January 2009--February 2010.
*Non-equity Member - Beus Gilbert, PLLC, Scottsdale (mostly securities litigation) October 2005--December 2008.
*Founder & Sole Shareholder-Kenneth L. Mann, P.A., Orlando, FL 1997--2005 & 1982--1993.
Of Counsel (1991-1993) and Shareholder - Trickel, Leigh & Mann, P.A., Orlando, FL (*Deceased, Feb. 1996) 1994—1997.
* Shareholder - Subin, Shams, Rosenbluth & Moran, P.A., Orlando, FL 1974—1982.
*Associate - Deutsch, Deutsch, Goldberg & Young, P.A., Ft. Lauderdale, FL 1973—1974.
*Audit Senior - Price Waterhouse & Co., Miami, FL 1966—1970.

EDUCATION

* J.D., *magna cum laude*, Mercer University, Macon, GA, 1973; Valedictorian; Editor-in-Chief, Mercer Law Review (1972--1973); Intra-State Moot Court Champion Team (1972)(defeating Emory and U. of Georgia).
* B.S. in Bus. Admin., U. of N. Carolina, Chapel Hill, 1966. Order of the Old Well (honorary society).

LICENSURE

*Member, Arizona Bar (2005) and Florida Bar (1973) (Among top four scores of approximately 900 candidates on Florida Bar exam).
*Admitted to practice before: U.S. Supreme Court; U.S. Courts of Appeals, 2nd, 9th (2005), and 11th Circuits; 9th Circuit Bankruptcy Appellate Panel; U.S. District Courts: District of Arizona (2005), Middle District of Florida; U.S. Tax Court; U.S. Court of Federal Claims.
*ADR Panels, Bankr. D. AZ (Phx. Div.); Former Certified Civil & Appellate (FL) Mediator (voluntary non-renewals).
*Former CPA (Florida and North Carolina) (voluntary non-renewals).

STATE AND FEDERAL PUBLISHED OPINIONS

**Patton v. Kera Technology, Inc.*, 895 So.2d 1175 (Fla. 5th DCA 2005), *rev. granted*, 912 So.2d 318(Fla. 2005)
**Campellone v. Cragan*, 910 So.2d 363 (Fla. 5th DCA 2005)
**Magnolia Manor, Inc. v. Siegel*, 866 So.2d 142 (Fla. 5th DCA 2004)
**In re Inman*, 260 B.R. 233 (Bankr. M.D. Fla. 2000)
**Florida Dept. of Revenue v. Race*, 743 So.2d 169 (Fla. 5th DCA 1999)
**Bryan v. Clayton & McCulloh*, 698 So.2d 1236 (Fla. 5th DCA 1997), *rev. denied*, 707 So.2d 1123 (Fla. 1998), *cert. denied*, 524 U.S. 933 (1998), *after remand*, 753 So.2d 632 (Fla. 5th DCA 2000)
**Peck v. Delta Fire Sprinkler, Inc.*, 675 So.2d 711 (Fla. 5th DCA 1996)
**C&W Leasing, Inc. v. Orix Credit Alliance, Inc.*, 957 F.2d 815 (11th Cir. 1992)
**In re Siefert*, 130 B.R. 607 (Bankr. M.D. Fla. 1991)
**In re Walsh*, 123 B.R. 925 (Bankr. M.D. Fla. 1991)
**Barden v. Pappas*, 532 So.2d 707 (Fla. 5th DCA 1988), after remand, 565 So.2d 755 (Fla. 5th DCA 1990)
**Jones v. Orlando Second Car Center*, 30 Fla. Supp.2d 105 (Fla. 9th Cir. 1988)
**Winterbotham v. Computer Corps, Inc.*, 490 So.2d 1282 (Fla. 5th DCA 1986)
**Holland v. Hattaway*, 438 So.2d 456 (Fla. 5th DCA 1983)
**Zirot v. Gilmer*, 336 So.2d 680 (Fla. 4th DCA 1976)

PUBLICATIONS

* "12 Advocacy Tips For Mediation," Arizona ADR Forum 3, Fall 2014 , State Bar of Arizona ADR Section
* "CPAs and Mediation," AZCPA 13 (July/August 2011).
* "ADR is Useful in Handling Wills & Trusts," DISPUTE RESOLUTION TIMES, American Arbitration Association (Summer 1997).
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In Florida: To members of: the Florida Bar; Orange County (FL) Bar; Marion County and Seminole County Inns of Court; Attorneys Title Insurance Fund (to annual conventions of approximately 900 attendees); U. of Miami annual real estate symposium (approximately 200 attendees); Central Florida Tax Roundtable; Florida Institute of CPA's; Civic groups; and public television. Topics included: mediation and arbitration; real estate fraud; bankruptcy discharge & dischargeability litigation; consumer law, *e.g.*, Fair Debt Collection Practices Act; ethics, professionalism, and legal malpractice; major probate, tax, and business legislation; estate planning; will drafting; tax issues in divorce, etc.

PRIMARY PROFESSIONAL SERVICE ACTIVITIES

In Arizona:

*Member, Executive Council, State Bar of Arizona ADR Section, July 2014 -- 2016.
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*Florida Bar Professional Ethics Committee (Chair, 1996--1997), 1993—2005.
*Barry U. of Orlando School of Law, Adjunct Faculty (For Professor on Sabbatical -- taught Professional Responsibility, which includes Legal Ethics), 2000.
*Florida Bar Special Committee on Unbundled Legal Services, 2003—2005.
*Florida Bar 9th Circuit Grievance Committee "D" (Chair, 1996--1997), 1994—1997.
*Florida Bar UPL Standing Committee (Vice Chair 1986--1988) 1981—1988.
*Florida Bar Clients Security Fund Committee (re clients whose attorneys had embezzled trust funds)1983 -- 1986.
*Orange County Bar Law Week Committee (Chair) 1985—1986.

PRIMARY COMMUNITY SERVICE ACTIVITIES

* Mentor, Arizona Association of Conflict Resolution's Annual Youth Peer Mediation Conferences, 2014 & 2016
*Director (President 2011) of my HOA, 2011-- February 2014.

In Florida

*Director, Seminole State College of Florida (*fka* Seminole Community College) Foundation, Inc., 1998—2005.
*Rotary, Seminole County South (Director, 1994--1997 and Paul Harris Fellow Award), 1977—2002.
*Member, City of Maitland Franchise Review Committee, 1995 --2000 (*esp*. electricity franchise renewal vs. RFP's).
*Volunteer Advisor and Judge, Orange County (FL) Bar Association Teen Court, 1995 & 2000.
*Director, Holocaust Memorial Resource & Education Center of Central Florida, Inc., 1982 --1994.
*Volunteer Mediator, Orange County Bar Association Citizen Dispute Settlement Program, 1978 --1996.
*Member, Business Advisory Board, Orange County Public Schools, 1994 --1996.
*Volunteer Instructor, Junior Achievement, 1993 --1995.
*Volunteer Attorney, Orange County Bar Ass'n. Legal Aid Society's Homeless Advocacy Project, 1992—1993.

EXHIBIT B

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES
FOR ARIZONA IPP PROPOSED CLASS REPRESENTATIVE CHRISTOPHER HUNT

ADR OFFICE OF KENNETH L. MANN **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Ken Mann	19.70		21.70		10.60		4.70		11.60		21.70	9.50			99.50	$300.00	$29,850.00
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**19.70**	**0.00**	**21.70**	**0.00**	**10.60**	**0.00**	**4.70**	**0.00**	**11.60**	**0.00**	**21.70**	**9.50**	**0.00**	**0.00**	**99.50**		**$29,850.00**
NON-ATTORNEYS	**NONE**																
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**19.70**	**0.00**	**21.70**	**0.00**	**10.60**	**0.00**	**4.70**	**0.00**	**11.60**	**0.00**	**21.70**	**9.50**	**0.00**	**0.00**	**99.50**		**$29,850.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

ADR OFFICE OF KENNETH L. MANN

ATTORNEYS	DATE RANGE	HOURLY RATE
Kenneth L. Mann	6/20/2013 through 2/28/2017	$300
–		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
None	N/A	N/A

EXHIBIT D

(REDACTED)

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Invoice #
281Amended

5/21/2017

Jennie Lee Anderson, Esq.
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Jennie Anderson(jennie@andrusanderson.co
Kelli Good (kelli.good@andrusanderson.com

Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
1/1/2016	Receive, review and respond to correspondence from Susman Godfrey & client re discovery	0.4	300.00	120.00
1/4/2016	Receive, review and respond to correspondence & attachments from Cotchett Pitre	0.4	300.00	120.00
1/8/2016	Receive, review and respond to numerous emails from Cotchett Pitre and from [redacted] re discovery, depo scheduling, etc.	1.2	300.00	360.00
1/10/2016	Receive, review and respond to emails from Susman Godfrey and [redacted] re discovery, depo scheduling, etc.	0.7	300.00	210.00
1/11/2016	Receive, review and respond to emails and additional documents sent from Susman Godfrey, and review my file notes, prior correspondence, etc. we previously provided in regard thereto;	1.4	300.00	420.00
1/12/2016	Receive, review and respond to emails from Cotchett Pitre re 2nd Interrogatories and from Susman Godfrey and client re defendants' request for delay in depo scheduling and new dates	0.8	300.00	240.00
1/13/2016	Receive, review and respond to emails from Susman Godfrey, client, and Bonnett Fairbourn, counsel for Phoenix [redacted] logistics for depo scheduling	0.4	300.00	120.00
1/17/2016	Receive, review and respond to emails from Susman Godfrey, [redacted] and Bonnett Fairbourn (.4) and correspondence to client re depo preparation (.5)	0.9	300.00	270.00

	Total
	Payments/Credits
	Balance Due

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158Amended

5/21/2017

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Kelli Good (kelli.good@andrusanderson.com

Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
6/20/2013	Conferences with steering committee counsel Robert Green re class action (.6); receive and review class action complaint (1.1); and confer w/possible [redacted] (.5)	2.2	300.00	660.00
6/21/2013	[redacted] (1.7) [redacted] (1.4)	3.1	300.00	930.00
6/22/2013	Receive, review and respond to correspondence from [redacted] re questionnaire, etc.	0.8	300.00	240.00
6/23/2013	Receive, review and respond to correspondence from [redacted] and Steering Committee member Robert Green	1.8	300.00	540.00
6/27/2013	Receive, review and respond to correspondence from Robert Green and [redacted]	0.3	300.00	90.00
6/28/2013	Receive, review and forward correspondence from Robert Green to client re protective order	0.8	300.00	240.00
6/29/2013	Conference with client to receive, review, organize and assemble documents retrieved by client re proof of purchases, etc.(8); prepare correspondence to Robert Green discussing and forwarding same (.4); receive, review and forward client's executed consent re protective order to Robert Green and Jaclyn Verducci (.2)	1.4	300.00	420.00
7/1/2013	Correspondence to and from California counsel and client re draft of complaint relevant to him, and review relevant allegations	0.9	300.00	270.00

	Total
	Payments/Credits
	Balance Due

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Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
7/2/2013	Conference with client and correspondence to California counsel advising client concurs w/ allegations relevant to him	0.4	300.00	120.00
7/3/2013	Receive, review and forward amended redacted complaint to client	0.5	300.00	150.00
7/19/2013	Correspondence to client advising of oncoming flood of defense filings and inquiring of desire or not for relevant copies now versus later	0.3	300.00	90.00
7/30/2013	Correspondence to California counsel explaining use of San Francisco Community College case # on [redacted]	0.2	300.00	60.00
4/16/2014	Receive, review and forward to client, with explanatory cover letter, Robert Green's correspondence that came earlier this month while abroad, re gathering all documents not previously submitted, etc.(.8); review documents previously submitted, and respond to Robert thereon (.9)	1.7	300.00	510.00
4/26/2014	Conference with client to receive and review additional documents and lithium ion battery pack recently located ;	0.4	300.00	120.00
4/27/2014	Correspondence to Robert Green re additional documents received yesterday from client, and take photos of battery pack in connection therewith	0.7	300.00	210.00

	Total
	Payments/Credits
	Balance Due

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Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
4/30/2014	Review recent court filing(s) affecting indirect purchasers, in particular, doc. #s 419, 430 and 431 (Indirect purchasers' corrected, consolidated 2nd amended class action complaint, and motions to dismiss by defendants Sony and Toshiba or subsidiaries)	1.4	300.00	420.00

Total	$5,070.00
Payments/Credits	$0.00
Balance Due	$5,070.00

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174Amended

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Kelli Good (kelli.good@andrusanderson.com

Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
5/21/2014	Correspondence to Robert Green re client's documents, etc.	0.2	300.00	60.00
5/23/2014	Receive and review correspondence reply from Robert Green and confer w/client thereon	0.3	300.00	90.00

Reflects write-off of $480

Total	$150.00
Payments/Credits	$0.00
Balance Due	$150.00

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5/21/2017

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Jennie Anderson(jennie@andrusanderson.co
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Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
9/19/2014	[redacted]	0.7	300.00	210.00
9/23/2014	Draft proposed corrections to Cotchett's version of facts, and correspondence to client thereon	3.2	300.00	960.00
9/25/2014	Correspondence to client to circle back to inquire re status of his review	0.1	300.00	30.00
9/26/2004	Receive, preliminary review, and preliminary response to client's corrections to Cotchett's narrative draft of facts	0.4	300.00	120.00
9/28/2014	Assemble and organize relevant documents (.6); draft revised statement of relevant facts for Cotchett firm (1.7); correspondence to (.8) and from (.1) [redacted] hereon	3.2	300.00	960.00
9/29/2014	Conferences with client re additional clarifications and corrections to recital of facts (1.4); emails (9) to and from [redacted] and Cotchett firm (2.7)	4.1	300.00	1,230.00
9/30/2014	Assemble and organize documents (originals) for shipping to Cotchett firm (.8); finalize letter to Cotchett firm thereon (.7); correspondence to client thereon (.2); ship documents and cover letter to Cotchett firm via Fedex (.2)	1.9	300.00	570.00

Reflects write-down of $990

Total	$4,080.00
Payments/Credits	$0.00
Balance Due	$4,080.00

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178Amended

5/21/2017

Jennie Lee Anderson, Esq.
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Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
10/1/2014	Receive and review acknowledgement of receipt of Arizona updated discovery materials from Cotchett, Pitre & McCarthy, LLP	0.1	300.00	30.00
10/2/2014	Receive and review ##512 and 513, Omnibus Order on Motions to dismiss direct and indirect purchasers' second amended consolidated complaints, responses and replies, and Order Setting Status Conference for Oct. 30 and Joint Statement by Oct 21	0.9	300.00	270.00
10/5/2014	Receive and review #514, Order Setting Discovery Hearing on status report (#510), discovery letter brief re deposition protocol (#501) and joint discovery letter brief re certain defendants (#484). Hearing set for November 10	0.2	300.00	60.00
10/17/2014	Receive and review #516, Stipulation w/proposed order re time to file amended complaint and responsive pleadings, and #517, Order approving same	0.2	300.00	60.00
10/25/2014	Receive and review #518, Joint Case Management Statement, as modified and #519, Indirect Purchasers' 3rd Amended Consolidated Amended Class Action Complaint	0.9	300.00	270.00

Total	$690.00
Payments/Credits	$0.00
Balance Due	$690.00

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228Amended

5/21/2017

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Kelli Good (kelli.good@andrusanderson.com

Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
4/28/2015	Receive and review e-mail from Demetrius Lambrinos re his need to interview [redacted] in re drafting answers to interrogatories (.1); conference [redacted] to confirm availability (.1); multiple subsequent calls and emails to and from Demetrius and [redacted] to coordinate mutually convenient time (.7); review key documents in prep for tomorrow's conference call (.8)	1.7	300.00	510.00
4/29/2015	Conference with Demetrius Lambrinos and [redacted] in re areas of inquiry on defendants' interrogatories; send several emails to Demetrius for expediency, w/key attachments that had been previously sent over the past two years, which were discussed this morning	2.4	300.00	720.00
4/30/2015	Conference with Demetrius Lambrinos and [redacted] n following up, clarifying and concluding [redacted] responses to areas of inquiry on defendants' interrogatories.	0.8	300.00	240.00

Total	$1,470.00
Payments/Credits	$0.00
Balance Due	$1,470.00

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Invoice #
235Amended

5/21/2017

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Kelli Good (kelli.good@andrusanderson.com

Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
5/8/2015	Receive, review and respond to draft interrogatory answers & objections, and correspondence from Demetrius and client, [redacted] thereon	1.2	300.00	360.00
5/9/2015	Receive, review and respond to additional correspondence from Demetrius	0.3	300.00	90.00
5/10/2015	Correspondence to Demetrius re questions on responses in interrogatory answers (.5); review Demetrius' responses to the questions posed (.4)	0.9	300.00	270.00
5/11/2015	Receive, review and respond to correspondence from [redacted] re interrogatory answers	0.3	300.00	90.00
5/13/2015	Receive, review and respond to follow-up correspondence from [redacted] re interrogatory answers	0.2	300.00	60.00
5/14/2015	Receive, review and respond to correspondence from Demetrius re logistics on original of verification on interrogatory answers	0.2	300.00	60.00

Total	$930.00
Payments/Credits	$0.00
Balance Due	$930.00

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Invoice #
263Amended

5/24/2017

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Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
8/31/2015	Review recent court filing(s) affecting or possibly affecting indirect purchasers--##s 764(.3); 786(.2); 789 (.1); 796(.1); 800(,3); 803(.1);804(.1);805(.1);809(.2)	1.5	300.00	450.00

Total	$450.00
Payments/Credits	$0.00
Balance Due	$450.00

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Invoice #
#270Amended

5/24/2017

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Re:

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ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
9/15/2015	Conference with Demetrius Lambrinos re. inter alia, whether [redacted] had timely notice of Toshiba's withdrawal from Lithium cell market; receive and review Demetrius' follow-up e-mail thereon; forward same to [redacted]	0.4	300.00	120.00
9/16/2015	Receive and review [redacted] response and forward same to Demetrius	0.1	300.00	30.00
9/30/2015	Review recent court filing(s) affecting indirect purchasers--##s 825 (.2); 845 (.2)	0.4	300.00	120.00

Total	$270.00
Payments/Credits	$0.00
Balance Due	$270.00

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275

1/11/2016

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Re:

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ANTITRUST CLASS ACTION LITIGATION--
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Date		Hours	Rate	Amount
12/10/2015	Receive, review and forward to [redacted], with accompanying e-mail from [redacted] California counsel's inquiry re scheduling availability and any conflict dates within window proposed by California counsel for his deposition and for telephonic and in-person preparatory conferences	0.3	300.00	90.00
12/14/2015	Receive, review and respond to California counsel re depo scheduling	0.1	300.00	30.00
12/15/2015	Receive, review and respond to California counsel re depo scheduling	0.3	300.00	90.00
12/21/2015	Receive and review counsel correspondence re depo scheduling	0.1	300.00	30.00
12/22/2015	Receive and review counsel correspondence re depo scheduling	0.1	300.00	30.00
12/29/2016	Receive and review counsel correspondence re depo scheduling	0.1	300.00	30.00
12/30/2015	Receive, review and respond to California counsel's latest correspondence re depo scheduling	0.3	300.00	90.00

Total	$390.00
Payments/Credits	$0.00
Balance Due	$390.00

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5/24/2017

Invoice #
288Amended

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Re:

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ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
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CHRIS HUNT)

Date		Hours	Rate	Amount
2/1/2016	Receive, review and respond to correspondence from Susman Godfrey and client re depo prep	0.3	300.00	90.00
2/2/2016	Conference with Lindsey Godfrey Eccles & [redacted] for his Feb. 4 deposition preparation	2.3	300.00	690.00
2/4/2016	Attend all-day deposition of our client, [redacted] w/lead counsel Lindsey Godfrey Eccles	8	300.00	2,400.00
2/8/2016	Receive, review and respond to e-mail from Lindsey Godfrey Eccles re depo follow-up	0.1	300.00	30.00
2/9/2016	Correspondence to Lindsey re protective order and attaching copy of [redacted]	0.2	300.00	60.00
2/11/2016	Receive, review and respond to multiple emails from client and Lindsey Godfrey Eccles re documentary support for 2010 computer purchase and drafting of supplemental responses to defendants' interrogatories and review files in connection therewith	1.7	300.00	510.00
2/16/2016	Receive and review correspondence from Lindsey Godfrey Eccles and proposed supplemental responses to defendants' interrogatories re client's computer purchases	0.2	300.00	60.00
2/17/2016	Receive, review, and respond to additional correspondence from Lindsey Godfrey Eccles and [redacted] re supplemental responses to defendants' interrogatories	0.3	300.00	90.00

	Total
	Payments/Credits
	Balance Due

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5/21/2017

Invoice #
281Amended

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Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
1/19/2016	Correspondence to Lindsey Eccles Godfrey re [redacted] forthcoming depo, chronology, etc. to facilitate her preparation with him (.4); attend telephonic preliminary depo prep w/her and [redacted] (1.9); and emails to [redacted] thereon (.3)	2.6	300.00	780.00
1/20/2016	Correspondence supplementation to Lindsey Eccles Godfrey and receive and review her correspondence, documents, and agreement of opposing counsel to conclude depo by 5 pm	0.7	300.00	210.00
1/21/2016	Receive, review and respond to correspondence from [redacted]	0.1	300.00	30.00

Total	$2,880.00
Payments/Credits	$0.00
Balance Due	$2,880.00

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5/24/2017

Invoice #
288Amended

Jennie Lee Anderson, Esq.
Liaison Counsel for Indirect Purchasers
Andrus Anderson LLP
Jennie Anderson(jennie@andrusanderson.co
Kelli Good (kelli.good@andrusanderson.com

Re:

IN RE: LITHIUM ION BATTERIES
ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
2/27/2016	[redacted]	0.1	300.00	30.00
2/29/2016	Receive and review e-mail from Krysta Pachman of Susman Godfrey posing additional inquiries for [redacted] re computer purchases	0.2	300.00	60.00

Total	$4,020.00
Payments/Credits	$0.00
Balance Due	$4,020.00

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Invoice #
295Amended

5/21/2017

Jennie Lee Anderson, Esq.
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Date		Hours	Rate	Amount
3/15/2016	Receive, review and respond to emails from Client, Krysta, and Demetrius Lambrinos re corrections to proposed responses to Rogs and RFP's	0.6	300.00	180.00
3/18/2016	Receive and cursory review of confidential settlement agreement with Sony and 4th amended consolidated complaint	0.1	300.00	30.00
3/20/2016	Review settlement agreement (.7); correspondence to JoAnne Lein thereon (.2)	0.9	300.00	270.00
3/20/2016	Review 4th amended consolidated complaint further (.3); review file(.2); e-mail to Colleen Cleary et al. thereon re apparent computer discrepancy (.2)	0.7	300.00	210.00
3/21/2016	Receive, review and respond to e-mail from client re questions on Sony settlement	0.6	300.00	180.00
3/22/2016	Review e-mail from client re concerns on computer search logistics and e-mail from Steve Williams offering assurances thereon; conference w/Steve Williams re questions on Sony settlement logistics	0.8	300.00	240.00
3/22/2016	Conferences with Demetrius, [redacted] and vendor re logistics of forensic search of ESI on [redacted] computer	0.4	300.00	120.00
3/23/2016	Receive, review and respond to emails from vendor, client, and Demetrius	0.7	300.00	210.00
3/24/2016	E-mail to client re Sony settlement w/DPPs and attachments to proposed order thereon, including DPPs' probable Q&A -- which will likely be a guide to a settlement w/IPPs	0.6	300.00	180.00

	Total
	Payments/Credits
	Balance Due

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Re:
IN RE: LITHIUM ION BATTERIES ANTITRUST CLASS ACTION LITIGATION-- Master File No. 4:13-MD-02420 (YGR) (ARIZONA INDIRECT PURCHASER CHRIS HUNT)

Date		Hours	Rate	Amount
12/4/2016	(3.4)); e-mail Colleen Cleary et al. re questions, etc. thereon (1.3)	4.7	300.00	1,410.00
12/5/2016	Receive, review and respond to emails from [redacted] and Colleen Cleary re LG Chem settlement agreement and [redacted] consent thereto	0.3	300.00	90.00
12/16/2016	E-mail to [redacted] transmitting and briefly discussing proposed settlement agreement with Hitachi	0.2	300.00	60.00
12/21/2016	Review proposed settlement agreement with Hitachi (3.7);correspondence thereon to Demetrius Lambrinos re questions, etc. thereon (.6)	4.3	300.00	1,290.00
12/29/2016	E-mail to Demetrius Lambrinos per his request to schedule telephone conference to address our questions on Hitachi settlement agreement	0.1	300.00	30.00
12/30/2016	Conference with Demetrius Lambrinos re Hitachi settlement agreement and conference with [redacted] thereafter to advise him of outcome thereof	0.6	300.00	180.00

Total	$3,060.00
Payments/Credits	$0.00
Balance Due	$3,060.00

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Date		Hours	Rate	Amount
3/2/2016	Receive, review and respond to inquiries from client, Krysta Kauble Pachman and Lindsey Godfrey Eckles re questions posed by them	1.3	300.00	390.00
3/2/2016	Receive, review and respond to numerous emails from Lindsey Godfrey Eckles and client re defendants' recent discovery requests, (1.1); review files in connection therewith (1.3)	2.4	300.00	720.00
3/7/2016	Receive and review emails from Krysta Kauble Pachman and client	0.1	300.00	30.00
3/8/2016	Receive, review and respond to emails from Krysta Kauble Pachman and [redacted] re defendants' current discovery requests	1	300.00	300.00
3/9/2016	Receive, review and respond to additional emails from Krysta Kauble Pachman and client re defendants' current discovery requests	1.4	300.00	420.00
3/10/2016	Correspondence to Krysta Kauble Pachman and client re defendants' current discovery requests	0.3	300.00	90.00
3/11/2016	Correspondence from and to Krysta Kauble Pachman and client re defendants' current discovery requests	0.6	300.00	180.00
3/14/2016	Review proposed 2nd Supplemental Responses to Discovery Requests (.3); e-mail to Krysta Kauble Pachman et al. re necessary corrections (. 7); receive, review and respond to emails from client thereon (.1)	1.1	300.00	330.00
3/14/2016	Respond to Krysta's corrected changes to proposed response to latest Rogs	0.3	300.00	90.00

	Total
	Payments/Credits
	Balance Due

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Date		Hours	Rate	Amount
3/25/2016	[redacted]	1.4	300.00	420.00
3/25/2016	Receive, review and respond to emails from client and Demetrius re relevant computers and proper identification thereof	0.4	300.00	120.00
3/27/2016	Receive, review and respond to yesterday's and today's emails from Demetrius and [redacted] re conflict in description of computers in 4th amended and consolidated complaint	0.7	300.00	210.00
3/28/2016	[redacted]	0.7	300.00	210.00
3/31/2016	Correspondence to Demetrius with recent photos taken by KLM per request of plaintiffs' forensic expert -- showing metadata on KLM's "dumb-phone" of the [redacted] -- and which battery was brought to client's deposition by KLM so defense counsel could inspect it if desired.	0.4	300.00	120.00

Total	$5,250.00
Payments/Credits	$0.00
Balance Due	$5,250.00

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Re:

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ANTITRUST CLASS ACTION LITIGATION--
Master File No. 4:13-MD-02420 (YGR)
(ARIZONA INDIRECT PURCHASER
CHRIS HUNT)

Date		Hours	Rate	Amount
4/1/2016	Receive and review e-mail from Demetrius Lambrinos re KLM's photos of meta data on his dumb-phone re front and back of original Sony battery pack, showing date and times of said photos, and re [redacted] verification on proposed responses to latest discovery from defendants	0.3	300.00	90.00
4/6/2016	Receive and review e-mail from Krysta Pachman to [redacted] re various discovery to date, et al.	0.1	300.00	30.00
4/7/2016	Receive and review e-mail from Krysta Pachman re defendants' 2nd RFP's and proposed responses and objections	0.2	300.00	60.00
4/11/2016	Receive, review and respond to e-mail from Krysta Pachman re defendants' 3rd interrogatories, and receive and review e-mail from Demetrius Lambrinos okaying KLM's proposed language re absence of any reimbursement to [redacted] expenses incurred to date	0.6	300.00	180.00
4/12/2016	Receive and review e-mail from Krysta Pachman inquiring re status of errata sheets on [redacted] deposition transcript	0.1	300.00	30.00
4/13/2016	[redacted]	0.2	300.00	60.00
4/14/2016	Receive and review e-mail from Chris with draft errata sheets	0.1	300.00	30.00

	Total
	Payments/Credits
	Balance Due

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CHRIS HUNT)

Date		Hours	Rate	Amount
4/14/2016	E-mail to [redacted] with suggested tweaks to his draft errata sheets, and e-mail from Chris approving same	.6	300.00	180.00
4/14/2016	Receive and review e-mail from Krysta Pachman approving of tweaked errata sheets and forwarding final version and signature page	0.2	300.00	60.00
4/18/2016	Receive and review [redacted] notarized signature on errata sheets and Krysta's e-mail acknowledging same	0.1	300.00	30.00
4/19/2016	Draft redline of lead counsel's proposed answers to questions 21 and 22 of defendants' 3rd Interrogatories (.9); forward to [redacted] for Review (.1); receive and review e-mail approval of client thereon (.1); e-mail to Demetrius Lambrinos redlined proposed answers to questions 21 and 22 as approved by client (.1)	1.2	300.00	360.00
4/20/2016	Receive and review emails from [redacted] and Krysta Pachman re his signed verification on 3rd Interrogatories	0.1	300.00	30.00

Total	$1,140.00
Payments/Credits	$0.00
Balance Due	$1,140.00

EXHIBIT E

NAME: ADR Office of Ken Mann
for Az IPP Chris Hunt

EXHIBIT E

IN RE: LITHIUM ION BATTERIES INDIRECT
KEN MANN CUMULATIVE MONTHLY COSTS REPORT
THROUGH FEBRUARY 28, 2017

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				$0.00
Court Costs				$0.00
Experts/consultants				$0.00
Federal Express	Oct-14	$24.75		$24.75
Hearing Transcripts				$0.00
Investigation				$0.00
Lexis/westlaw				$0.00
Messenger/delivery				$0.00
Photocopies - in House				$0.00
Photocopies - Outside				$0.00
Postage				$0.00
Service of Process				$0.00
Special Supplies				$0.00
Telephone/telecopier				$0.00
Travel (Parking)	For client's depo	$24.00		$24.00
Miscellaneous				$0.00
TOTAL		$48.75	$0.00	$48.75

EXHIBIT 3

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JENNIE LEE ANDERSON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ANDRUS ANDERSON LLP**

I, Jennie Lee Anderson, declare:

1. I am a Partner of Andrus Anderson LLP and Liaison Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as court-appointed Liaison Counsel for IPPs throughout the course of this litigation. The background and experience of Andrus Anderson LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Andrus Anderson LLP performed the following work:

a. Serving as IPP Liaison Counsel, my firm and I worked closely with Co-Lead Counsel, this Court, other IPP supporting counsel, and all other plaintiff and defense counsel on a number of tasks. Specific Liaison Counsel tasks included coordinating newly related cases into the MDL and assisting counsel not familiar with the Northern District's practices and procedures; coordinating with all parties regarding stipulations and responding to inquiries from the Court; preparing pleadings, discovery, and deposition preparation materials as directed by Co-Lead Counsel; attending court hearings as needed; auditing time and expenses submitted by supporting IPP counsel to insure compliance with this Court's orders and Co-Lead Counsel's protocols regarding compensable time and expenses for the benefit of the class; coordinating with Co-Lead Counsel and other IPP supporting counsel regarding timekeeping and expense guidelines throughout the litigation, and

consolidation and verification of time and expense reports for communication with the Court on a quarterly basis.

b. In addition to Liaison Counsel duties, my firm also performed significant substantive work on the case such as participating in the preparation and taking of a multi-day deposition with the direct purchaser plaintiffs, conducting extensive foreign language and English document review at both first and second tier level, and high-level evaluation and organization of potential class certification evidence at the direction of co-lead counsel.

5. Attached hereto as **Exhibit B** is a billing summary of Andrus Anderson LLP's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Andrus Anderson LLP. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records for the period of March 1, 2017 to present at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Andrus Anderson LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Jennie Lee Anderson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Andrus Anderson LLP and filed on May 26, 2017. (ECF No. 1813-4). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Andrus Anderson LLP since June 1, 2013 was 1,966 hours, with a corresponding lodestar of $945,567.50 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses Andrus Anderson LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Andrus Anderson LLP expended a total of $52,275.17 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Andrus Anderson

LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Andrus Anderson LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on this 18th day of April, 2019 at San Francisco, California.

/s/ Jennie Lee Anderson

Jennie Lee Anderson

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

ANDRUS ANDERSON LLP

155 Montgomery Street · Suite 900, San Francisco, California 94104
T: 415.986.1400 · F: 415.986.1474 · www.andrusanderson.com

The Firm

The law firm of Andrus Anderson LLP ("Andrus Anderson") has a diverse and thriving practice representing plaintiffs in consumer, employment, antitrust and product liability cases. The law firm was founded in 2007 by partners Lori E. Andrus and Jennie Lee Anderson. The firm's clients include individuals, classes and small businesses across the nation.

Current Cases and Recent Successes

Examples of the firm's leadership in complex class and mass actions are listed below.

Antitrust

a. *In re Lithium Ion Batteries Antitrust Litigation,* MDL No. 4:13-md-02420 YGR, United States District Court for the Northern District of California. Andrus Anderson partner, Jennie Lee Anderson, is Liaison Counsel for the indirect purchaser plaintiffs. The indirect purchaser plaintiffs allege that the major manufacturers of lithium ion batteries engaged in contract, combination or conspiracy to artificially inflate the prices of lithium ion batteries during the relevant time period.

b. *In re Cathode Ray Tube (CRT) Antitrust Litigation,* MDL No. 1917 SC, United States District Court for the Northern District of California. Andrus Anderson played a core role as counsel for the indirect purchaser class in this antitrust case against the major manufacturers of CRTs and CRT products, including televisions and monitors. The indirect purchaser plaintiffs allege that defendants engaged in contract, combination or conspiracy to artificially inflate the

prices of CRTs during the relevant time period. The Court granted final approval of more than $567 million in settlements in 2016.

c. *In re Domestic Air Travel Antitrust Litigation*, MDL No. 2656, United States District Court for the District of Columbia. Andrus Anderson represents a class of consumer who purchased airline tickets for domestic travel directly from the defendants. The firm has performed significant case management and discovery in the case. Plaintiffs allege, among other things, that the four largest U.S. airlines conspired to raise ticket prices by agreeing to limit capacity on their flights.

d. *In re TFT-LCD (Flat Panel) Antitrust Litigation,* MDL No. 07-cv-01827 SI, United States District Court for the Northern District of California. Andrus Anderson played a significant role as class counsel for the indirect purchaser plaintiffs in this antitrust case against the major manufacturers of Thin Film Transistor Liquid Crystal Display panels ("TFT-LCD") and TFT-LCD products, such as flat screen televisions and monitors. The indirect purchaser plaintiffs alleged that defendants engaged in contract, combination or conspiracy to artificially inflate the prices of TFT-LCD panels. Class counsel achieved settlements of more than $1 billion on behalf of the indirect purchaser classes they represent.

e. *Precision Associates, Inc., et al. v. Panalpina World Transportation (Holding) Ltd.*, *et al.*, Case No. 08-cv-00042 (JG) (VVP), United States District Court for the Eastern District of New York. Andrus Anderson represented plaintiffs who purchased freight forwarding services from freight forwarding companies. Plaintiffs allege that freight forwarders conspired to fix the price of associated surcharges in violation of federal antitrust laws.

f. *In re Transpacific Passenger Air Transportation Antitrust Litigation*, Case No. 07-cv-5634-CRB, in the United States District Court for the Northern District of California. Andrus

Anderson performed significant work in the case, representing plaintiffs of transpacific airline travel who allege that the defendant airline carriers conspired to fix the prices of air passenger travel including associated surcharges.

Consumer Protection

a. *Ralston v. Mortgage Investors Group, Inc., Countrywide Home Loans, Inc., et al.*, Case No. 08-00536 JF, United States District Court for the Northern District of California. Ms. Anderson was co-lead counsel in this class action which resulted in a settlement of more than $100,000,000 for California borrowers. The lawsuit alleged that Countrywide Home Loans Inc. and Mortgage Investors Group sold certain Pay Option ARM loans, while failing to disclose, among other critical information, the true interest rate on the loan and that negative amortization was certain to occur if the borrower adhered to the payment schedule provided by the defendants.

b. *In re EasySaver Rewards Litigation,* Case No. 09-cv-02094-AJB, United States District Court for the Southern District of California. Ms. Anderson is co-lead counsel in this case representing consumers who were the victims of a so-called "rewards" program, in which consumers were enrolled without their knowledge or consent and then subjected to monthly membership fees, though no benefits were conferred. On February 4, 2013, the court granted final approval of a nationwide settlement.

c. *Fox v. Nissan North American Inc.,* Case No. GCG-09-490470, California Superior Court, County of San Francisco. Ms. Anderson was co-lead counsel representing a class of California owners of 2001-2005 Nissan Pathfinders, Altimas and Sentras manufactured with defective power valve screws that are prone to loosen and detach, resulting in engine failure and/or loss of control of the vehicles. At settlement, Nissan notified class members of the defect

and individual class members will receive $500-$3000 in compensation for their out-of-pocket expenses.

d. *Milligan v. Toyota Motor Sales, U.S.A., Inc.,* Case No. 09-05418 RS, United States District Court for the Northern District of California, and *Washington v. Toyota Motor Sales, U.S.A., Inc.*, Superior Court of California, County of Santa Clara, Case No. 1-10-CV-164200. Ms. Anderson was class counsel representing a class of 2001-2003 Toyota RAV4 vehicle owners who experienced problems with the engine control modules ("ECMs") or ECM-related damage to the transmissions. The settlement provided for an extended warranty and full reimbursement for class members who paid out-of-pocket to repair or replace the ECMs and/or transmissions.

e. *Honda/Michelin PAX Tire Litigation.* Andrus Anderson represented consumers in *Olson v. American Honda Motor Company, Inc.,* Case No. RG07341165, Alameda Superior Court; and the federal cases consolidated into Multidistrict Litigation No. 1911, before Judge Roger Titus in the District of Maryland, where Andrus Anderson partner, Lori E. Andrus was appointed co-lead class counsel. The firm achieved a nationwide settlement, wherein class members were reimbursed for premature wear on their tires, received an extended warranty on PAX tires for the life of the vehicles, and additional safety features, including the opportunity to obtain a spare tire kit and enhanced emergency service. The litigation was expanded to include owners of certain Nissan vehicles equipped with the PAX Systems and tires.

Mass Tort

g. *In Re National Prescription Opiate Litigation,* Case No. 1:17-md-02804-DAP, Northern District of Ohio United States District Court. Andrus Anderson represents ten cities and counties in these coordinated proceedings against the major opioid manufacturers and distributors for

issuing false and misleading statements about risk of addiction and failure to report suspicious sales in violation of state and federal law.

h. *Proton Pump Inhibitor Litigation*, MDL No. 02789-CCC-MF, United States District Court for the District of New Jersey. Andrus Anderson represents plaintiffs in their claims against various manufacturers of Proton Pump Inhibitors ("PPI") marketed and used for the treatment of gastroesophageal reflux disease (GERD) and other conditions caused by excess stomach acid. The complaints allege that defendants knew overuse of PPIs causes severe kidney injuries but continued to market the drugs for frequent or daily use. Ms. Anderson has been appointed Plaintiffs' Steering Committee.

i. *Essure Product Cases,* JCCP 4887, Superior Court of California, Alameda County. Andrus Anderson represents women harmed by the Essure birth control device in these coordinated proceedings pending in California. Ms. Andrus has been appointed to the Plaintiffs' Steering Committee

a. *In re RoundUp Products Liability Litigation*, MDL No. 2741, United States District Court for the Northern District of California. Andrus Anderson represents individuals suffering life-threatening injuries due to exposure to RoundUp pesticides in this MDL proceedings. Ms. Andrus has been appointed Liaison Counsel for Plaintiffs in the MDL.

j. *Yaz, Yasmin and Ocella Contraceptive Cases Coordinated Proceeding (JCCP) No. 4608*, pending in Los Angeles County Superior Court, State of California. Andrus Anderson represents dozens of clients bringing claims against Bayer Corporation, among others, for their injuries resulting from the use of Yaz, Yasmin or Ocella birth control. Ms. Andrus was appointed to the Plaintiffs' Steering Committee in the case.

k. *In re Ortho Evra Products Liability Litigation*, MDL No. 1742, United States District Court for the Northern District of Ohio. Andrus Anderson represented more than twenty individual clients and was actively involved in the Multi-District Litigation ("MDL") regarding the Ortho Evra birth control patch and women's health problems resulting from the use of the Ortho Evra birth control patch. The Ortho Evra patch, manufactured by Ortho-McNeil and Johnson & Johnson, has been found to increase the risk of stroke and dangerous blood clots, and has been linked to strokes, heart attacks, and deaths in women. Ms. Andrus was appointed as a member of the MDL Plaintiffs' Steering Committee.

Employment

l. *Coates v. Farmers Insurance Group,* Case No. 5:15-cv-01913 LHK, United States District Judge for the Northern District of California. Ms. Andrus is lead counsel in this wage discrimination lawsuit brought on behalf of women attorneys in Farmers' Claims Litigation department who allege they were paid less than equally or less qualified men. In June 2016, District Court Judge Lucy H. Koh granted preliminary approval of the settlement, which provides $4 million in payments to class members, and also requires Farmers to make a number of business practices changes designed to improve the working lives of Farmers' female litigators, and to increase transparency in Farmers' compensation systems.

m. *Harrison v Strategic Experiential Group,* Case No. RG16807555, California Superior Court, Alameda County. Andrus Anderson and their co-counsel represented Moet Hennessey brand models and logistic personnel who were misclassified as independent contractors and not compensated for all hours worked or overtime. Final approval has been granted and administration of the settlement fund is under way.

n. *Minns v. ACES, et al.*, Case No. 13-cv-03249 SI, United States District Court for the Northern District of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On February 19, 2016, the district court granted final approval to a class-wide settlement. Ms. Andrus was appointed Class Counsel in the case.

o. *Freeman v. On Assignment Staffing Service, Inc.*, Case No. RG12652237, Alameda County Superior Court, State of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On June 19, 2014, the court granted final approval of a class-wide settlement. Ms. Andrus was appointed Class Counsel in the matter.

p. *Kyriakakos v. Veolia Water North America, Inc.*, Case No. 10-00751, Alameda County Superior Court, State of California. Andrus Anderson represented wastewater and water treatment plant operator, lab technicians and mechanics in this wage and hour suit. Plaintiffs alleged that Veolia failed to pay its workers for all hours worked conducting remote monitoring tasks, time spent donning, doffing, and showering, and that Veolia violated California law with its meal and rest break policies. On October 25, 2013, the court granted final approval of a class-wide settlement. Ms. Andrus was appointed Class Counsel in the matter.

q. *Bolton v. U.S. Nursing*, Case No. 12-CV-04466 LB, United States District Court for the Northern District of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On October 18,

2013, the district court granted final approval to a class-wide settlement. Andrus Anderson partner, Lori Andrus, was appointed Class Counsel in the case.

r. *Nelson et al., v. California State University, East Bay Foundation, Inc.,* Case No. RG09442869, Alameda County Superior Court, State of California. Andrus Anderson was lead counsel in this wage and hour litigation on behalf of English as a second language (ESL) teachers. In their complaint, the school's ESL teachers alleged that they were not paid for all hours worked. Andrus Anderson obtained back pay for their clients and negotiated major changes in the practices and policies at California State University, East Bay, to ensure the ESL teachers are fairly compensated going forward.

Partner Biographies

JENNIE LEE ANDERSON

Born in Indianapolis, Indiana, Andrus Anderson partner Jennie Lee Anderson has extensive experience representing plaintiffs in antitrust, consumer protection, employment and personal injury matters. Ms. Anderson has proven herself an effective advocate and has served or serves as liaison or co-lead counsel in multiple state and nationwide class actions including, but not limited to, *In re Lithium Ion Batteries Antitrust Litigation, In re EasySaver Rewards Litigation, Ralston v. Mortgage Investors Group and Countrywide Home Loans, Inc.*, *Fox v. Nissan North America, Inc., Proton Pump Inhibitor Litigation*, *Harrison v Strategic Experiential Group,* and *Milligan v. Toyota Motor Sales, U.S.A., Inc.*

Prior to co-founding Andrus Anderson, Ms. Anderson practiced complex litigation in the San Francisco offices of Lieff, Cabraser, Heimann & Bernstein, LLP and the law firm currently known as Robbins, Geller, Rudman & Dowd, LLP, where she prosecuted multiple class action and complex cases on behalf of plaintiffs in the areas of consumer protection, antitrust,

employment, securities and product liability. In addition, Ms. Anderson has considerable knowledge of habeas corpus proceedings, having represented indigent inmates on death row at the Habeas Corpus Resource Center in San Francisco.

Ms. Anderson has been recognized as a Northern California Super Lawyer for the last seven years, serves on the Board of Governors for the American Association for Justice ("AAJ"), and is the past chair of the AAJ Class Action Litigation Group, of the AAJ Antitrust Litigation Group, and the AAJ Business Torts Section. Ms. Anderson is the Vice President of the Pound Civil Justice Institute and sits on the Board of Legal Aid at Work. She is a frequent author and lecturer on a variety of topics regarding class actions and complex litigation.

Ms. Anderson earned her Bachelor of Arts degree from the University of Wisconsin-Madison in 1991 and her Juris Doctor degree from University of California, Hastings College of the Law in 1999.

LORI ERIN ANDRUS

Born in Lafayette, Louisiana, Andrus Anderson partner Lori E. Andrus is a member of the bars of the California, the District of Columbia, and New York. She is admitted to practice in the United States District Courts for the districts of Northern, Southern, Central and Eastern Districts of California. Ms. Andrus has received Martindale-Hubbell's highest rating (AV) for legal ability and ethical standards.

Ms. Andrus has extensive experience representing consumers and employees in individual and class actions, in addition to her work representing individuals harmed by defective pharmaceutical and medical devices in mass tort litigation. In recognition of her effective leadership skills, Ms. Andrus currently serves, or has served as lead counsel, co-lead counsel, or as a member of the Plaintiffs' Steering Committee in multiple state and nationwide class actions

and multidistrict litigations, including, *Coates v. Farmers Insurance Group, Minns v. ACES*, *Bolton v. U.S. Nursing, Freeman v. On Assignment, Kyriakakos v. Veolia Water North America, Inc.*, *Yaz, Yasmin and Ocella Contraceptive Cases Coordinated Proceeding*, and *In re Ortho Evra Birth Control Patch Litigation*, each of which is summarized above.

Ms. Andrus previously served as the Chair of the Women Trial Lawyers' Caucus of the American Association for Justice ("AAJ"). She is a frequent author and lecturer on a variety of topics regarding equal pay, class actions and complex litigation. In 2013, she was recognized as the Woman Consumer Advocate of the Year by the Consumer Attorneys of California and in 2015 was named as one of 75 Outstanding Women Lawyers nationwide by the National Law Journal.

Ms. Andrus earned her Bachelor of Arts degree from the Boston University, *cum laude,* and graduated from Duke University School of Law with honors. Between college and law school, Ms. Andrus worked for two Members of Congress in Washington, D.C., first for U.S. Representative Rick Boucher from Virginia, then for U.S Representative James Hayes, from Louisiana.

Prior to co-founding Andrus Anderson, Ms. Andrus was a partner at the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, where she litigated multiple class actions and complex matters in state and federal courts across the country in the areas of mass tort, product liability, loan discrimination, consumer fraud and employment.

EXHIBIT B

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

Firm Name: ANDRUS ANDERSON LLP

Reporting Period: March 1, 2017 through April 16, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jennie Lee Anderson (P)								6.50			86.70				93.20	$800.00	$74,560.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.50**	**0.00**	**0.00**	**86.70**	**0.00**	**0.00**	**0.00**	**93.20**		**$74,560.00**
NON-ATTORNEYS																	
Kelli Good (PL)								1.50			19.40				20.90	$315.00	$6,583.50
Joann Pham (PL)											65.30				65.30	$315.00	$20,569.50
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.50**	**0.00**	**0.00**	**84.70**	**0.00**	**0.00**	**0.00**	**86.20**		**$27,153.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**8.00**	**0.00**	**0.00**	**171.40**	**0.00**	**0.00**	**0.00**	**179.40**		**$101,713.00**

EXHIBIT C

ANDRUS ANDERSON LLP

Time Dates: 03/01/2017 - 04/16/2019

1091-001: Batteries antitrust

Date	User	Description	Note	Quantity	Price	Total
04/16/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	[redacted] from IPP supporting firms.	0.80	$315.00	$252.00
04/16/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with B. Siegel re status of updated lodestar and expense summary and next steps; email follow-up.	0.50	$315.00	$157.50
04/16/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to emails re status of [redacted] and call with [redacted] re same.	0.30	$315.00	$94.50
04/15/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Emails with [redacted] re [redacted]; email JLA re same.	0.20	$315.00	$63.00
04/12/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare lodestar and expense summary of [redacted] per B. Siegel.	1.70	$315.00	$535.50
04/12/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Emails re [redacted]	2.10	$315.00	$661.50
04/12/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review emails re [redacted] and [redacted] and exhibits; update spreadsheet.	0.50	$315.00	$157.50
04/11/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call re status of [redacted].	0.50	$315.00	$157.50
04/11/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue [redacted]; update charts.	4.50	$315.00	$1,417.50
04/11/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with team re [redacted]	0.50	$800.00	$400.00
04/10/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue [redacted]; emails with lead counsel re statuses.	4.00	$315.00	$1,260.00
04/09/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	[redacted] IPP supporting counsel [redacted].	3.70	$315.00	$1,165.50
04/09/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Meet with JP re status of [redacted] per colead counsel.	0.20	$800.00	$160.00

04/08/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	[redacted] IPP fee petition submissions; email JLA re [redacted]; search receipts in [redacted] file; email supporting firms re [redacted].	2.00	$315.00	$630.00
04/08/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Answer questions re allowable costs and time.	0.20	$800.00	$160.00
04/05/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Audit incoming IPP firm declarations and exhibits (3.1); call and email with [redacted] re audit (0.2); emails with IPP firms requesting revised time and expenses per audited details (1.2); emails with co-leads to coordinate auditing and submissions (0.2).	4.70	$315.00	$1,480.50
04/05/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to question re class rep decls.	0.20	$800.00	$160.00
04/02/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Calls with [redacted]; review and audit IPP firm declarations and exhibits; follow-up with [redacted] re expense details.	0.30	$315.00	$94.50
04/01/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call IPP office re [redacted] (0.1); review and save additional declarations and exhibits (0.2); update spreadsheet (0.1).	0.40	$315.00	$126.00
03/29/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to supporting counsel questions	0.20	$800.00	$160.00
03/29/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call to M. Caylao re transferring documents; [redacted] and update status spreadsheet.	0.60	$315.00	$189.00
03/29/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow-up with [redacted]; calls re same; review additional submission.	0.20	$315.00	$63.00
03/28/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	[redacted] IPP co-counsel fee petition declarations and exhibits for accuracy.	0.80	$315.00	$252.00
03/27/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to supporting counsel inquiries re case status.	0.20	$800.00	$160.00
03/26/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up with supporting counsel re [redacted]	0.20	$800.00	$160.00
03/26/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review emails re [redacted]; follow-up re IPP contact emails; revise master contacts.	0.60	$315.00	$189.00
03/26/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Finalize documents and instructions to supporting counsel re compensable time and costs. (.3) Email JP re tracking [redacted] (.1)	0.40	$800.00	$320.00
03/25/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Collect emails re IPP firm contacts for [redacted]	0.50	$315.00	$157.50
03/25/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email colead counsel re [redacted]	0.10	$800.00	$80.00

03/24/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft [redacted] for supporting counsel. (.8) Draft exhibits for supporting counsel. (1.0) Review and approve lists of supporting counsel for materials; review past emails re [redacted] with supporting counsel. (.7)	2.50	$800.00	$2,000.00
03/22/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email w lead counsel re policies for time and suggested procedures vis a vis supporting counsel.	0.50	$800.00	$400.00
03/21/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review directions from co-lead counsel (0.1). Call with co-lead counsel and meeting with JP re [redacted] (0.2). Prepare correspondence for supporting counsel (0.5). Draft declarations and [redacted] (0.4).	1.20	$800.00	$960.00
03/21/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Send co-lead orders re protocol and suggested exhibits.	0.20	$800.00	$160.00
03/20/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Update expenses summary with updated TERs; email JLA re same.	1.00	$315.00	$315.00
03/11/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up with L. Chan re [redacted]. Email JP re same.	0.20	$800.00	$160.00
03/11/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review time and email supporting counsel re [redacted] (.3) Emails to L. Chan re [redacted] (.2) Review prior submissions and advise co-lead counsel accordingly. (.5)	1.00	$800.00	$800.00
02/26/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and respond to lead counsel emails re TERs.	0.10	$315.00	$31.50
02/15/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Receive and respond re IPP firm reports.	0.10	$315.00	$31.50
01/31/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare email template and email JLA re expense summaries questions.	0.30	$315.00	$94.50
01/30/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to emails re [redacted]	0.20	$315.00	$63.00
01/30/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Email co-counsel re adjustments to TER.	0.10	$315.00	$31.50
01/30/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare quarterly summary report; emails re same.	0.60	$315.00	$189.00
01/30/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to LC's questions on costs from supporting counsel. (.2) Review summary for Court and specify revisions. (.1) Draft response re [redacted] (.1)	0.40	$800.00	$320.00

01/25/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Email JLA re expenses audit and template email to IPP firms.	0.20	$315.00	$63.00
01/24/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue batteries expenses audit.	4.50	$315.00	$1,417.50
01/23/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare and send LCHB expense summary report; continue Batteries expenses audit.	0.90	$315.00	$283.50
01/14/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Emails re updated expense summary; audit expenses.	1.10	$315.00	$346.50
01/11/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Email complete summary of all IPP firms expenses to JLA.	0.20	$315.00	$63.00
01/11/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with LC re [redacted] (0.1). Meeting with JP re [redacted] (0.2). review reports (0.2). Email supporting counsel re [redacted] (0.3).	0.80	$800.00	$640.00
01/10/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue preparing expense summary for all IPP firms.	4.10	$315.00	$1,291.50
01/09/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue preparing expense summary for all IPP firms per co-lead counsel.	3.80	$315.00	$1,197.00
01/08/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue working on expenses summary for all IPP firms per co-lead counsel.	3.00	$315.00	$945.00
01/07/2019	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Meeting with JP re review of expense report requested by colead counsel. Email LC re same.	0.40	$800.00	$320.00
01/07/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continue expenses summary per co-lead counsel.	0.10	$315.00	$31.50
01/04/2019	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Compile and audit expenses of IPP firms for Mtn for Preliminary Approval per co-lead counsel.	2.80	$315.00	$882.00
12/31/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review expenses summary; emails re expenses summary; update expenses summary spreadsheet.	2.00	$315.00	$630.00
10/31/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up on time report for court.	0.10	$800.00	$80.00
10/23/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare quarterly summary reports; email CPM re September report.	1.10	$315.00	$346.50
08/20/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	[redacted] time and expense reports for June and July; forward to JLA.	0.10	$295.00	$29.50
08/07/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to question re case status from supporting counsel.	0.20	$800.00	$160.00

07/25/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with JLA; revise Batteries quarterly report.	0.10	$295.00	$29.50
07/25/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	review and revise quarterly statement for court. Follow up questions to JP. Email lead counsel.	0.30	$750.00	$225.00
07/24/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Receive final TERs; complete quarterly summary for court and summary report with breakdowns for lead counsel.	0.20	$295.00	$59.00
07/20/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare quarterly time summaries for court.	0.40	$295.00	$118.00
07/20/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare quarterly summary for court.	0.10	$295.00	$29.50
07/20/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	emails re time report for the court	0.30	$750.00	$225.00
04/27/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Receive revised time reports; revise quarterly summaries; email LC quarterly summaries.	0.20	$295.00	$59.00
04/27/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow-up email to [redacted] re time report.	0.10	$295.00	$29.50
04/26/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Email with lead counsel (0.1); revise quarterly summaries (0.4) ; email JLA draft quarterly summary with breakdown (0.1).	0.60	$295.00	$177.00
04/26/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with JLA; follow-up email to [redacted] re time report.	0.10	$295.00	$29.50
04/23/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review time submissions for quarterly summary (0.6); prepare quarterly summary (0.3); audit time details of non-lead counsel (0.2); email JLA re same (0.1).	1.20	$295.00	$354.00
03/27/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email JP re preparing time report for court	0.10	$750.00	$75.00
03/27/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Email JLA re summary reports due.	0.10	$295.00	$29.50
02/12/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Received email from lead counsel requesting TER details; response re same.	0.10	$295.00	$29.50
01/23/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email [redacted] re time submission policy. (.1) Audit detailed time and email [redacted] re [redacted] (.2) Mtg with JP re report. Review and finalize report for court and updated reports. (.2) Email coleads with explanation re reports. (.1)	0.60	$750.00	$450.00
01/23/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Received time details from [redacted] for May 2017 and reviewed; emailed JLA re the same (0.1); made final revision to summary reports and sent to lead-	0.30	$295.00	$88.50

			counsel (0.1); received time details from [redacted] and revised summary reports (0.1).			
01/22/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Review time details from non-lead counsel from March 2017 to present; prepare final summaries for lead counsel's review.	0.50	$295.00	$147.50
01/22/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Corrected RGRD TER for May 2017 and subsequent revised TERs; revised summary through December 2017.	0.20	$295.00	$59.00
01/22/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review JP's checklist for quarterly submissions and [redacted] (.4) communicate with colead counsel re quarterly report (.1)	0.50	$750.00	$375.00
01/19/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Continued revising previous hours and lodestar details submitted in last 2 quarters; updated summary report.	3.00	$295.00	$885.00
01/18/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Time reviewing revisions, sorting information, and preparing summary report for court.	2.50	$295.00	$737.50
01/18/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Audit incoming time submissions (0.2). Follow up w nonlead counsel re [redacted] (0.2). Mtg with JP re creating quarterly report for the court (0.2).	0.60	$750.00	$450.00
01/18/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Meeting with JLA re TER procedure.	0.30	$295.00	$88.50
01/17/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review audited time.	0.30	$750.00	$225.00
01/17/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft emails to five supporting firms explaining [redacted].	0.50	$750.00	$375.00
01/17/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review last submission to the court for updating. Email L. Chan re report for court.	0.30	$750.00	$225.00
01/11/2018	Joann Pham	1091: 11 Litigation Strategy, Analysis, and Case Management	Received email re IPP co-counsel TER; responded to email and saved note.	0.10	$295.00	$29.50
01/10/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to inquiries from non lead counsel re status.	0.20	$750.00	$150.00
01/04/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	email LC re report to court that JP will create.	0.10	$750.00	$75.00
01/02/2018	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to emails re [redacted].	0.20	$750.00	$150.00
12/15/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	respond to inquiries from non-lead counsel re case status and status of appeals	0.20	$750.00	$150.00
12/04/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP time report and update master tracking spreadsheet.	0.10	$305.00	$30.50

11/08/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	F/u re time reports from non-lead counsel	0.10	$750.00	$75.00
11/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review quarterly time report. Email lead counsel the same.	0.20	$750.00	$150.00
11/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to non-lead counsel's inquiries re status of case.	0.20	$750.00	$150.00
11/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft response to [redacted] (non-lead counsel) re inquiries - status re class rep update.	0.30	$750.00	$225.00
10/31/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and compare time reports in preparation for court quarterly submission (0.3); follow up with Co-leads counsel re reports (0.2); multiple emails to co -leads (0.2); respond to inquiries from non-lead counsel re status (0.5); call with BG re status (0.2).	1.40	$750.00	$1,050.00
10/31/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email KG re report status.	0.20	$750.00	$150.00
10/12/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP time reports; update master tracking spreadsheet.	0.50	$305.00	$152.50
10/11/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP reports, update master tracking spreadsheet.	0.30	$305.00	$91.50
10/10/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP report and update chart.	0.10	$305.00	$30.50
10/04/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP reports, update master tracking spreadsheet.	0.10	$305.00	$30.50
09/29/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP reports, update master tracking spreadsheet.	0.80	$305.00	$244.00
09/18/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP time and expense submissions and update master tracking spreadsheet.	0.90	$305.00	$274.50
09/14/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP time and expense submissions and update master tracking spreadsheet.	0.40	$305.00	$122.00
09/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email with JZ and Court.	0.10	$750.00	$75.00
08/31/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming IPP reports; update master tracking spreadsheet.	0.50	$305.00	$152.50
08/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Emails re time report.	0.10	$750.00	$75.00

07/28/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email KG and LC re report; review quarterly report.	0.20	$750.00	$150.00
07/12/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.30	$305.00	$91.50
07/11/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up re [redacted]	0.10	$750.00	$75.00
07/10/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.40	$305.00	$122.00
07/10/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Meeting with KG re procedure (0.2); draft email to co-lead counsel re [redacted] (0.2).	0.40	$750.00	$300.00
06/22/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email re timekeeping procedures.	0.10	$750.00	$75.00
06/06/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP timekeeping summary and email firm requesting submission of corresponding detailed reports; update master tracking spreadsheet.	0.10	$305.00	$30.50
05/30/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to queries from S. Williams re [redacted]	1.00	$750.00	$750.00
05/26/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up with [redacted] re [redacted].	0.20	$750.00	$150.00
05/25/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up emails re [redacted].	0.50	$750.00	$375.00
05/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft/revise [redacted] (0.4); follow up with D. Lambrinos and L. Weaver re [redacted] (0.1).	0.50	$750.00	$375.00
05/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Multiple emails with co-leads re [redacted] (0.3); follow up re [redacted] (0.5).	0.80	$750.00	$600.00
05/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft letters re [redacted] (0.3); call with D. Lambrinos re [redacted] (0.2).	0.50	$750.00	$375.00
05/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Supporting co-counsel [redacted] (5.5); follow up re [redacted] with multiple firms (0.8).	6.30	$750.00	$4,725.00
05/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft email to [redacted] (0.3); follow up with co-lead counsel re [redacted] (0.2); follow up with multiple firms re [redacted] (1.1)	1.60	$750.00	$1,200.00
05/23/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to multiple questions, emails, and calls re [redacted] (2.5); meeting with KG (0.3); calls with D. Lambrinos re [redacted] (0.2); continue follow up re [redacted] (7.3).	10.30	$750.00	$7,725.00

05/22/2017	Kelli Good	1091: 08 Drafting Pleadings, Briefs, and Motions	Draft individual Incentive Award Declarations and email to IPP counsel per co-lead counsel's instructions.	1.50	$305.00	$457.50
05/22/2017	Jennie Anderson	1091: 08 Drafting Pleadings, Briefs, and Motions	Draft declaration and templates for supporting counsel (1.0); multiple calls with supporting counsel, co-leads, and KG re [redacted] (5.5).	6.50	$750.00	$4,875.00
05/19/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Calls, emails, and follow-up with multiple co-counsel re [redacted].	4.90	$750.00	$3,675.00
05/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Calls and emails with counsel advising them of [redacted].	0.80	$750.00	$600.00
05/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to [redacted] question re [redacted]	0.30	$750.00	$225.00
05/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with [redacted] re [redacted].	0.20	$750.00	$150.00
05/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email [redacted] and [redacted] answering [redacted] (0.3); revise time templates per lead counsel (0.2).	0.50	$750.00	$375.00
05/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Draft email to IPP counsel [redacted] (0.5); follow up with six more firms re [redacted] (3.0).	3.50	$750.00	$2,625.00
05/17/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Communication with supporting counsel re [redacted].	0.60	$750.00	$450.00
05/16/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Work with co-leads re [redacted].	5.40	$750.00	$4,050.00
05/16/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Calls and emails to non-lead counsel re audited time.	1.30	$750.00	$975.00
05/16/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow-up with non-lead counsel re [redacted] (0.8); [redacted] (1.4).	2.20	$750.00	$1,650.00
05/15/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Multiple meetings with counsel re [redacted] (1.0); [redacted] (1.0)	2.00	$750.00	$1,500.00
05/15/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and respond to emails re audited IPP reports; email JLA re same.	0.40	$305.00	$122.00
05/15/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Work with co-lead counsel responding to and meeting with multiple supporting counsel firms re [redacted]	7.10	$750.00	$5,325.00
05/12/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Meetings with IPP counsel re [redacted] and D. Lambrinos and follow up on [redacted]	2.20	$750.00	$1,650.00
05/12/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email with co-leads re [redacted] (0.2); calls with IPP counsel to [redacted] (0.5).	0.70	$750.00	$525.00

05/11/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Calls with IPP counsel to [redacted] (1.5); draft correspondence re same (1.5); follow up with co-lead counsel (0.2).	3.30	$750.00	$2,475.00
05/10/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with [redacted] re [redacted].	0.30	$750.00	$225.00
05/09/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Telephone call with D. Lambrinos re [redacted], and	0.50	$750.00	$375.00
05/09/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email to co-leads re [redacted]	0.10	$750.00	$75.00
05/09/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review [redacted]; email counsel re [redacted].	0.40	$750.00	$300.00
05/09/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Call with [redacted] re [redacted].	0.40	$750.00	$300.00
05/09/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review expense report for [redacted] and email [redacted].	0.20	$750.00	$150.00
05/09/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Conference call with JLA and D. Lambrinos re [redacted]; discuss upcoming process and timeframe.	0.70	$305.00	$213.50
05/08/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review revised IPP reports from [redacted] and [redacted]; review and revise corrected IPP reports from [redacted]; email to co-lead counsel.	1.40	$305.00	$427.00
05/05/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Telephone call with [redacted] at [redacted], prepare and send [redacted] revised summary time reports for review and approval.	0.30	$305.00	$91.50
05/05/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Telephone call with D. Lambrinos re [redacted] (0.1); Review M. Cayalo email and my notes re [redacted], respond to M. Cayalo email (0.2); telephone call with [redacted], send follow-up email (0.2); telephone call and email to [redacted] (0.1); telephone call with [redacted] (0.1); exchange emails with [redacted] (0.1); leave voicemail for [redacted], [redacted] and send follow-up email (0.2); leave voicemail for [redacted] and send follow-up email (0.2); leave voicemail for [redacted] and send follow-up email (0.2); email [redacted] (0.1);	1.50	$305.00	$457.50
05/05/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and respond to email from [redacted] re [redacted] (0.1); review [redacted] revised reports and documentation previously submitted to co-lead counsel	0.80	$305.00	$244.00
05/04/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP report; update chart.	0.10	$305.00	$30.50

05/03/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review [redacted]; email to co-lead counsel re same.	0.20	$305.00	$61.00
05/02/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and respond to emails from IPP counsel re [redacted]	0.90	$305.00	$274.50
05/01/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming submissions (0.8); consult with D. Lambrinos and KG re [redacted] (0.2); follow-up re same (0.5).	1.50	$750.00	$1,125.00
04/29/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP revised/updated reports (0.9); email to co-lead counsel (0.1).	1.00	$305.00	$305.00
04/28/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Assist IPP counsel with preparing reports for time and expense incurred June 2013—February 2017 (0.5); review and follow up on [redacted] (1.5); email completed sets of records to co-lead counsel (0.2).	2.20	$305.00	$671.00
04/28/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review incoming time from non-lead counsel (1.2); respond to calls and emails from supporting counsel re [redacted] (0.3); email with co-leads and calls re [redacted] (0.2).	1.70	$750.00	$1,275.00
04/27/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up on [redacted] from supporting counsel (0.4); [redacted] from supporting counsel (1.3); call with S. Williams re [redacted] (0.2).	1.90	$750.00	$1,425.00
04/26/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and compile revised IPP reports; email re same.	0.40	$305.00	$122.00
04/26/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review and respond to emails from co-counsel re [redacted] (0.5); calls with supporting counsel re [redacted] (0.6); follow up with KG re communications with supporting counsel (0.2).	1.30	$750.00	$975.00
04/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to KG questions re [redacted] from co-counsel (0.3); email D. Lambrinos re [redacted] (0.2).	0.40	$750.00	$300.00
04/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Follow up re inquiry from Hawaii counsel.	0.20	$750.00	$150.00
04/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email multiple supporting counsel re [redacted]; email KG re same	0.20	$750.00	$150.00
04/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Review [redacted].	1.00	$750.00	$750.00
04/18/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Respond to emails from supporting counsel re [redacted].	0.50	$750.00	$375.00
04/18/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.30	$305.00	$91.50
04/14/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP report; update chart.	0.10	$305.00	$30.50

04/13/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.40	$305.00	$122.00
04/11/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Email with D. Lambrinos re [redacted].	0.20	$750.00	$150.00
04/10/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Prepare materials requested by co-lead counsel (1.0); meeting with KG; call with D. Lambrinos re [redacted] (0.2). Respond to follow-up questions from co-lead counsel re [redacted] (0.5)	1.70	$750.00	$1,275.00
04/10/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Telephone call with D. Lambrinos and JLA re [redacted] project.	0.30	$305.00	$91.50
04/10/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Meeting with JLA re IPP report [redacted] review recent email chain re same (0.5); review and update master tracking spreadsheet to include all information requested by co-lead counsel (0.4); [redacted] re same (1.0).	1.90	$305.00	$579.50
04/04/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.20	$305.00	$61.00
03/24/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP report, update chart.	0.10	$305.00	$30.50
03/24/2017	Jennie Anderson	1091: 11 Litigation Strategy, Analysis, and Case Management	Emails with D. Lambrinos re [redacted].	0.20	$725.00	$145.00
03/21/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.20	$305.00	$61.00
03/16/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.20	$305.00	$61.00
03/15/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.20	$305.00	$61.00
03/10/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP report, update chart.	0.10	$305.00	$30.50
03/09/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, add new firm and update chart; email re same.	0.40	$305.00	$122.00
03/07/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart; emails re same.	0.30	$305.00	$91.50
03/01/2017	Kelli Good	1091: 11 Litigation Strategy, Analysis, and Case Management	Review IPP reports, update chart.	0.30	$305.00	$91.50
			Matter Total:	**179.40**		**$97,120.00**
			Client Total:	**179.40**		**$97,120.00**
			Activity Type Total:	**179.40**		**$97,120.00**

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
ANDRUS ANDERSON LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	$401.00
Experts/Consultants	
Online document database	
Federal Express	$233.72
Hearing Transcripts	
Investigation	
Lexis/Westlaw	$321.37
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$1,702.25
Photocopies – Outside	
Postage	$0.48
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	$78.00
Miscellaneous	
TOTAL:	$52,736.82

EXHIBIT 4

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JENNIE LEE ANDERSON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ANDRUS ANDERSON LLP**

I, Jennie Lee Anderson, declare:

1. I am a Partner of Andrus Anderson LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. I am court-appointed Liaison Counsel for the Indirect Purchaser Plaintiffs and my firm has served as counsel for IPPs throughout the course of this litigation. The background and experience of Andrus Anderson LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Andrus Anderson LLP performed the following work: Serving as IPP Liaison Counsel, my firm and I worked closely with Co-Lead counsel, the Court, other IPP counsel, and all other plaintiff and defense counsel on a number of tasks. Specific Liaison Counsel tasks included coordinating newly related cases into the MDL and assisting counsel not familiar with the Northern District's practices and procedures; coordinating with all parties regarding stipulations and responding to inquiries from the Court; preparing pleadings, discovery, and deposition preparation materials as directed by co-lead counsel; attending court hearings as needed; and coordinating with Co-Lead and other IPP counsel regarding timekeeping and expense guidelines throughout the litigation, auditing time and expense reports from IPP counsel, and consolidation of this information for communication with the Court on a regular basis. In addition to Liaison Counsel duties, my firm also performed significant substantive work on the case such as participating in the preparation and taking of a multi-day deposition with the direct purchaser plaintiffs, conducting extensive foreign language and English

document review at both first and second tier level, and high-level evaluation and organization of potential class certification evidence at the direction of co-lead counsel.

5. Attached hereto as **Exhibit B** is a billing summary of Andrus Anderson LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Andrus Anderson LLP during this period of time was 1,786.6, with a corresponding lodestar based on current rates of $843,854.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Andrus Anderson LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Andrus Anderson LLP has incurred during the course of this litigation. Andrus Anderson LLP expended a total of $52,041.47 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Andrus Anderson LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Andrus Anderson LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017, at San Francisco, California.

/s/ Jennie Lee Anderson

Jennie Lee Anderson

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

ANDRUS ANDERSON LLP

155 Montgomery Street · Suite 900, San Francisco, California 94104
T: 415.986.1400 · F: 415.986.1474 · www.andrusanderson.com

The Firm

The law firm of Andrus Anderson LLP ("Andrus Anderson") has a diverse and thriving practice representing plaintiffs in consumer, employment, mass torts and antitrust cases. Our clients include individuals, classes and small businesses nationwide.

Current Cases and Recent Successes

Andrus Anderson attorneys have considerable class action and complex litigation experience. A few examples of the firm's recent and ongoing class action and mass tort cases are listed below.

Antitrust

a. *In re Lithium Ion Batteries Antitrust Litigation,* MDL No. 4:13-md-02420 YGR, United States District Court for the Northern District of California. Andrus Anderson partner, Jennie Lee Anderson, is Liaison Counsel for the indirect purchaser plaintiffs. The indirect purchaser plaintiffs allege that the major manufacturers of lithium ion batteries engaged in contract, combination or conspiracy to artificially inflate the prices of lithium ion batteries during the relevant time period.

b. *In re Cathode Ray Tube (CRT) Antitrust Litigation,* MDL No. 1917 SC, United States District Court for the Northern District of California. Andrus Anderson played a core role as counsel for the indirect purchaser class in this antitrust case against the major manufacturers of CRTs and CRT products, including televisions and monitors. The indirect purchaser plaintiffs allege that defendants engaged in contract, combination or conspiracy to artificially inflate the

prices of CRTs during the relevant time period. The Court granted final approval of more than $567 million in settlements on July 7, 2016.

c. *In re TFT-LCD (Flat Panel) Antitrust Litigation,* MDL No. 07-cv-01827 SI, United States District Court for the Northern District of California. Andrus Anderson played a significant role as class counsel for the indirect purchaser plaintiffs in this antitrust case against the major manufacturers of Thin Film Transistor Liquid Crystal Display panels ("TFT-LCD") and TFT-LCD products, such as flat screen televisions and monitors. The indirect purchaser plaintiffs alleged that defendants engaged in contract, combination or conspiracy to artificially inflate the prices of TFT-LCD panels. Class counsel achieved settlements of more than $1 billion on behalf of the indirect purchaser classes they represent.

d. *In re Domestic Air Travel Antitrust Litigation*, MDL No. 2656, United States District Court for the District of Columbia. Andrus Anderson represents a class of consumer who purchased airline tickets for domestic travel directly from the defendants. Plaintiffs allege, among other things, that the four largest U.S. airlines conspired to raise ticket prices by agreeing to limit capacity on their flights.

e. *In re Transpacific Passenger Air Transportation Antitrust Litigation*, Case No. 07-cv-5634-CRB, in the United States District Court for the Northern District of California. Andrus Anderson holds a significant role in the case, representing plaintiffs of transpacific airline travel who allege that the defendant airline carriers conspired to fix the prices of air passenger travel including associated surcharges. Settlements of nearly $50 million have been achieved in the case to date and class counsel recently achieved a favorable ruling from the Ninth Circuit relating to the filed-rate doctrine.

f. *Precision Associates, Inc., et al. v. Panalpina World Transportation (Holding) Ltd., et al.*, Case No. 08-cv-00042 (JG) (VVP), United States District Court for the Eastern District of New York. Andrus Anderson represented plaintiffs who purchased freight forwarding services from freight forwarding companies. Plaintiffs allege that freight forwarders conspired to fix the price of associated surcharges in violation of federal antitrust laws.

g. *In re Domestic Drywall Antitrust Litigation*, MDL No. 2437, United States District Court for the Eastern District of Pennsylvania. Andrus Anderson and their co-counsel represent indirect purchaser plaintiffs in this case against manufacturers of gypsum drywall. Plaintiffs allege that defendants conspired to raise the price of gypsum drywall in violation of federal and state antitrust laws.

Consumer Protection

a. *Ralston v. Mortgage Investors Group, Inc., Countrywide Home Loans, Inc., et al.*, Case No. 08-00536 JF, United States District Court for the Northern District of California. Andrus Anderson partner, Jennie Lee Anderson, was co-lead counsel in this class action which resulted in a settlement of more than $100,000,000 for California borrowers. The lawsuit alleged that Countrywide Home Loans Inc. and Mortgage Investors Group sold certain Pay Option ARM loans, while failing to disclose, among other critical information, the true interest rate on the loan and that negative amortization was certain to occur if the borrower adhered to the payment schedule provided by the defendants.

b. *In re EasySaver Rewards Litigation,* Case No. 09-cv-02094-AJB, United States District Court for the Southern District of California. Andrus Anderson partner, Jennie Lee Anderson, is co-lead counsel in this case representing consumers who were the victims of a so-called "rewards" program, in which consumers were enrolled without their knowledge or consent and

then subjected to monthly membership fees, though no benefits were conferred. On February 4, 2013, the court granted final approval of a nationwide settlement valued at over $38 million.

c. *Milligan v. Toyota Motor Sales, U.S.A., Inc.,* Case No. 09-05418 RS, United States District Court for the Northern District of California, and *Washington v. Toyota Motor Sales, U.S.A., Inc.*, Superior Court of California, County of Santa Clara, Case No. 1-10-CV-164200. Andrus Anderson partner, Jennie Lee Anderson, was class counsel representing a class of 2001-2003 Toyota RAV4 vehicle owners who experienced problems with the engine control modules ("ECMs") or ECM-related damage to the transmissions. The settlement provided for an extended warranty and full reimbursement for class members who paid out-of-pocket to repair or replace the ECMs and/or transmissions.

d. *Honda/Michelin PAX Tire Litigation.* Andrus Anderson represented consumers in *Olson v. American Honda Motor Company, Inc.,* Case No. RG07341165, Alameda Superior Court; and the following federal cases consolidated into Multidistrict Litigation No. 1911, before Judge Roger Titus in the District of Maryland, where Lori Andrus was appointed Co-Lead Class Counsel (*Williams v. American Honda Motor Co., Inc.*, Case No.1:07-cv-05933, filed in the Northern District of Illinois; *Palmer v. American Honda Motor Co., Inc.*, Case No. CV07-1904-PHX-DGC, filed in the District of Arizona; *Longo v. American Honda Motor Co., Inc.*, Case No. 07-CIV-9399, filed in the Southern District of New York; and *Smith v. American Honda Motor Co., Inc.*, Case No .07-61524, filed in the Southern District of Florida). The litigation involved consumers who purchased or leased Honda and Acura vehicles equipped with the PAX® Tire and Wheel Assembly System. Plaintiffs alleged that Honda misrepresented and failed to disclose the defective nature of the PAX Systems causing injury to plaintiffs and class members. The firm achieved a nationwide settlement, wherein class members were reimbursed for premature wear

on their tires, received an extended warranty on PAX tires installed on their vehicles for the life of the vehicles, and additional safety features, including the opportunity to obtain a spare tire kit and enhanced emergency service. The litigation was expanded to include owners of certain Nissan vehicles equipped with the PAX Systems and tires.

Employment

e. *Coates v. Farmers Insurance Group,* Case No. 5:15-cv-01913 LHK, United States District Judge for the Northern District of California. Andrus Anderson partner, Lori E. Andrus, is lead counsel in this wage discrimination lawsuit brought on behalf of women attorneys in Farmers' Claims Litigation department who allege they were paid less than equally or less qualified men. In June 2016, District Court Judge Lucy H. Koh granted preliminary approval of the settlement, which provides $4 million in payments to class members, and also requires Farmers to make a number of business practices changes designed to improve the working lives of Farmers' female litigators, and to increase transparency in Farmers' compensation systems.

f. *Minns v. ACES, et al.*, Case No. 13-cv-03249 SI, United States District Court for the Northern District of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On February 19, 2016, the district court granted final approval to a class-wide settlement. Andrus Anderson partner, Lori Andrus, was appointed Class Counsel in the case.

g. *Freeman v. On Assignment Staffing Service, Inc.*, Case No. RG12652237, Alameda County Superior Court, State of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On

June 19, 2014, the court granted final approval of a class-wide settlement. Ms. Andrus was appointed Class Counsel in the matter.

h. *Kyriakakos v. Veolia Water North America, Inc.*, Case No. 10-00751, Alameda County Superior Court, State of California. Andrus Anderson represented wastewater and water treatment plant operator, lab technicians and mechanics in this wage and hour suit. Plaintiffs alleged that Veolia failed to pay its workers for all hours worked conducting remote monitoring tasks, time spent donning, doffing, and showering, and that Veolia violated California law with its meal and rest break policies. On October 25, 2013, the court granted final approval of a class-wide settlement. Ms. Andrus was appointed Class Counsel in the matter.

i. *Bolton v. U.S. Nursing*, Case No. 12-CV-04466 LB, United States District Court for the Northern District of California. Andrus Anderson and their co-counsel represented temporary nurses in a class case seeking damages for failure to pay on a daily basis, unpaid transportation time and improper meal deductions in violation of the California's labor laws. On October 18, 2013, the district court granted final approval to a class-wide settlement. Andrus Anderson partner, Lori Andrus, was appointed Class Counsel in the case.

j. *Nelson et al., v. California State University, East Bay Foundation, Inc.,* Case No. RG09442869, Alameda County Superior Court, State of California. Andrus Anderson was lead counsel in this wage and hour litigation on behalf of English as a second language (ESL) teachers. In their complaint, the school's ESL teachers alleged that they were not paid for all hours worked. Andrus Anderson obtained back pay for their clients and negotiated major changes in the practices and policies at California State University, East Bay, to ensure the ESL teachers are fairly compensated going forward.

k. *Adams v. Inter-con Security Systems, Inc.*, Case No. C-06-5428, United States District Court for the Northern District of California. Andrus Anderson and their co-counsel represented security guard employees in a multi-state class action seeking damages for unpaid hours worked off the clock in violation of the Fair Labor Standards Act and several states' labor laws. The lawsuit resulted in a $4 million settlement for class members who were required to attend daily security briefings and orientation sessions without pay.

Mass Tort

h. *Yaz, Yasmin and Ocella Contraceptive Cases Coordinated Proceeding (JCCP) No. 4608*, pending in Los Angeles County Superior Court, State of California. Andrus Anderson represents dozens of clients bringing claims against Bayer Corporation, among others, for their injuries resulting from the use of Yaz, Yasmin or Ocella birth control. Ms. Andrus has been appointed to the Plaintiffs' Steering Committee in the case.

i. *In re Ortho Evra Products Liability Litigation*, MDL No. 1742, United States District Court for the Northern District of Ohio. Andrus Anderson represented more than twenty individual clients and was actively involved in the Multi-District Litigation ("MDL") regarding the Ortho Evra birth control patch and women's health problems resulting from the use of the Ortho Evra birth control patch. The Ortho Evra patch, manufactured by Ortho-McNeil and Johnson & Johnson, has been found to increase the risk of stroke and dangerous blood clots, and has been linked to strokes, heart attacks, and deaths in women. Andrus Anderson partner Lori Andrus was appointed as a member of the MDL Plaintiffs' Steering Committee.

Partner Biographies

JENNIE LEE ANDERSON

Born in Indianapolis, Indiana, Andrus Anderson partner Jennie Lee Anderson has extensive experience representing plaintiffs in antitrust, consumer protection, employment and personal injury matters. Ms. Anderson has proven herself an effective advocate and has served or serves as liaison or co-lead counsel in multiple state and nationwide class actions including, but not limited to, *In re Lithium Ion Batteries Antitrust Litigation, In re EasySaver Rewards Litigation, Ralston v. Mortgage Investors Group and Countrywide Home Loans, Inc.,* and *Milligan v. Toyota Motor Sales, U.S.A., Inc.* each of which is summarized above.

Ms. Anderson has been recognized as a Northern California Super Lawyer for the last five years, serves on the Board of Governors for the American Association for Justice ("AAJ"), and is the past chair of the AAJ Class Action Litigation Group, AAJ Antitrust Litigation Group, and AAJ Business Torts Section. She is a frequent author and lecturer on a variety of topics regarding class actions, ESI discovery and complex litigation.

Ms. Anderson earned her Bachelor of Arts degree from the University of Wisconsin-Madison and her Juris Doctor degree from University of California, Hastings College of the Law. In law school, Ms. Anderson served as a judicial extern to the Honorable Martin J. Jenkins, District Court Judge for the Northern District of California, and was a legal intern for Legal Aid of Cambodia in Phnom Penh, Cambodia.

Prior to co-founding Andrus Anderson, Ms. Anderson practiced complex litigation in the San Francisco offices of Lieff, Cabraser, Heimann & Bernstein, LLP and the law firm currently known as Robbins, Geller, Rudman & Dowd, LLP, where she prosecuted multiple class action and complex cases on behalf of plaintiffs in the areas of consumer protection, antitrust,

employment, securities and product liability. In addition, Ms. Anderson has considerable knowledge of habeas corpus proceedings, having represented indigent inmates on death row at the Habeas Corpus Resource Center in San Francisco.

LORI ERIN ANDRUS

Born in Lafayette, Louisiana, Andrus Anderson partner Lori E. Andrus is a member of the bars of the California, the District of Columbia, and New York. She is admitted to practice in the United States District Courts for the districts of Northern, Southern, Central and Eastern Districts of California. Ms. Andrus has received Martindale-Hubbell's highest rating (AV) for legal ability and ethical standards.

Ms. Andrus has extensive experience representing consumers and employees in individual and class actions, in addition to her work representing individuals harmed by defective pharmaceutical and medical devices in mass tort litigation. In recognition of her effective leadership skills, Ms. Andrus currently serves, or has served as lead counsel, co-lead counsel, or as a member of the Plaintiffs' Steering Committee in multiple state and nationwide class actions and multidistrict litigations, including, *Coates v. Farmers Insurance Group, Minns v. ACES*, *Bolton v. U.S. Nursing, Freeman v. On Assignment, Kyriakakos v. Veolia Water North America, Inc.*, *Yaz, Yasmin and Ocella Contraceptive Cases Coordinated Proceeding*, and *In re Ortho Evra Birth Control Patch Litigation*, each of which is summarized above.

Ms. Andrus previously served as the Chair of the Women Trial Lawyers' Caucus of the American Association for Justice ("AAJ"). She is a frequent author and lecturer on a variety of topics regarding equal pay, class actions and complex litigation. In 2013, she was recognized as the Woman Consumer Advocate of the Year by the Consumer Attorneys of California and in

2015 was named as one of 75 Outstanding Women Lawyers nationwide by the National Law Journal.

Ms. Andrus earned her Bachelor of Arts degree from the Boston University, *cum laude,* and graduated from Duke University School of Law with honors. Between college and law school, Ms. Andrus worked for two Members of Congress in Washington, D.C., first for U.S. Representative Rick Boucher from Virginia, then for U.S Representative James Hayes, from Louisiana.

Prior to co-founding Andrus Anderson, Ms. Andrus was a partner at the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, where she litigated multiple class actions and complex matters in state and federal courts across the country in the areas of mass tort, product liability, loan discrimination, consumer fraud and employment.

EXHIBIT B

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

Firm Name: Andrus Anderson LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

(P) Partner
(A) Associate
(C) Contract Attorney
(LC) Law Clerk
(PL) Paralegal
(L) Librarian
(PI) Paralegal Intern

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR
Jennie Lee Anderson (P)	1.70		7.00	47.20		0.80		16.20	0.70	60.70	79.60			5.50	219.40	$750.00	$164,550.00
Lori Andrus (P)										0.30					0.30	$750.00	$225.00
Jessica Moy (A)								1.20			2.70				3.90	$485.00	$1,891.50
Masaya Uchino (C) Foreign language doc review							742.10								742.10	$450.00	$333,945.00
Masaya Uchino (C) English language doc review							48.80								48.80	$350.00	$17,080.00
John La Pietra (C) Foreign language doc review							285.60								285.60	$450.00	$128,520.00
Masako Kobayashi (C) Foreign language doc review							340.10								340.10	$450.00	$153,045.00
SUB-TOTAL	**1.70**	**0.00**	**7.00**	**47.20**	**0.00**	**0.80**	**1416.60**	**17.40**	**0.70**	**61.00**	**82.30**	**0.00**	**0.00**	**5.50**	**1640.20**		**$799,256.50**
NON-ATTORNEYS																	
Kelli Good (PL)				0.80				20.60			124.60				146.00	$305.00	$44,530.00
Tracy Voortman (PI)				0.40											0.40	$170.00	$68.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**1.20**	**0.00**	**0.00**	**0.00**	**20.60**	**0.00**	**0.00**	**124.60**	**0.00**	**0.00**	**0.00**	**146.40**		**$44,598.00**
GRAND TOTAL:	**1.70**	**0.00**	**7.00**	**48.40**	**0.00**	**0.80**	**1416.60**	**38.00**	**0.70**	**61.00**	**206.90**	**0.00**	**0.00**	**5.50**	**1786.60**		**$843,854.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

ANDRUS ANDERSON LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Jennie Lee Anderson (P)	06/2013—08/2013	$ 675
Jennie Lee Anderson (P)	09/2013—07/2015	$ 700
Jennie Lee Anderson (P)	08/2015—03/2016	$ 700
Jennie Lee Anderson (P)	04/2016—02/2017	$ 725
Lori E. Andrus (P)	06/2013—08/2013	$ 675
Jessica Moy (A)	06/2013—08/2013	$ 395
John La Pietra (C) Foreign language document review (capped)	09/2013—07/2015	$ 450
Masaya Uchino (C) Foreign language document review	09/2013—07/2015	$ 425
Masaya Uchino (C) English language document review (capped)	09/2013—07/2015	$ 350
Masako Kobayashi (C) Foreign language document review	09/2013—07/2015	$ 425
Masako Kobayashi (C) Foreign language document review	08/2015—03/2016	$ 425
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Kelli Good (PL)	06/2013—08/2013	$ 265
Kelli Good (PL)	09/2013—07/2015	$ 285
Kelli Good (PL)	08/2015—03/2016	$ 295
Kelli Good (PL)	04/2016—02/2017	$ 305
Tracy Voortman (PI)	09/2013—03/2016	$ 170

EXHIBIT D

(REDACTED)

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation

Andrus Anderson LLP

Initials	Timekeeper	
JLA	Jennie Lee Anderson (P)	(P) Partner
LEA	Lori E. Andrus (P)	(A) Associate
JM	Jessica Moy (A)	(C) Contract Attorney
JAL	John La Pietra (C)	(PL) Paralegal
MXU	Masaya Uchino (C)	(PI) Paralegal Intern
MK	Masako Kobayashi (C)	
KG	Kelli Good (PL)	
TV	Tracy Voortman (PI)	

Date	Description	Initials	Hours	Rate	Total	Task Code
06/05/2013	Draft letters to co-counsel regarding procedure for time submissions and email co-lead counsel regarding same (0.7); Email S. Williams regarding case update (0.1); Meeting with KG regarding new cases (0.1); Communicate with IPP counsel with questions (0.1).	JLA	1.0	$675	$675.00	11
06/05/2013	Meeting with JLA regarding new related cases and review docket re same.	KG	0.2	$265	$53.00	11
06/06/2013	Review/update IPP master tracking spreadsheet and email IPP counsel regarding deficiencies.	KG	0.3	$265	$79.50	11
06/06/2013	Draft letter to IPP counsel regarding time/expense.	JLA	0.3	$675	$202.50	11
06/07/2013	Respond to IPP counsel inquiries regarding timekeeping reports and update master tracking spreadsheet regarding same.	KG	0.5	$265	$132.50	11
06/09/2013	Respond to inquires from IPP counsel regarding time/expense requirements.	JLA	0.2	$675	$135.00	11
06/10/2013	Review complaints and orders regarding tag-along and related cases (0.5); Follow up with KG re office procedures for processing new IPP cases (0.3).	JLA	0.8	$675	$540.00	11
06/10/2013	Telephone call with S. Williams regarding hearing (0.2); Email IPP counsel answering questions regarding CAC, NOAs and time keeping requirements (0.4); Review incoming time and email KG regarding follow-up protocol with IPP counsel re problems with time (0.6).	JLA	1.2	$675	$810.00	11
06/10/2013	Review IPP timekeeping report and update master tracking spreadsheet (0.3); Email IPP counsel re deficiencies (0.2); Email JLA re same (0.1).	KG	0.6	$265	$159.00	11
06/11/2013	Telephone call with IPP counsel regarding detailed expense backup.	KG	0.1	$265	$26.50	11
06/11/2013	Review IPP timekeeping reports and update master tracking spreadsheet (0.9); Email IPP counsel re same (0.2).	KG	1.1	$265	$291.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
06/12/2013	Review IPP timekeeping report and update master tracking spreadsheet (0.1); Email IPP counsel re same (0.1).	KG	0.2	$265	$53.00	11
06/13/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
06/17/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$265	$53.00	11
06/19/2013	Email KG re tracking time-keeping deficiencies.	JLA	0.1	$675	$67.50	11
06/19/2013	Follow up with class counsel and E. Fastiff re [redacted]	JLA	0.2	$675	$135.00	1
06/20/2013	Follow up regarding calls from defense counsel.	JLA	0.2	$675	$135.00	11
06/22/2013	Follow up with K. Ewing regarding message regarding Batteries and email lead counsel regarding same.	JLA	0.2	$675	$135.00	11
07/05/2013	Follow up regarding requested extension from defense counsel for sealing motion.	JLA	0.2	$675	$135.00	11
07/05/2013	Email J.Zahid, J.Anderson and IPP Co-Leads regarding request for extension of time to move to seal	LEA	0.3	$675	$202.50	10
07/09/2013	Respond to E. Fastiff regarding related case inquiry (0.1); follow up regarding same with KG and JM (0.2).	JLA	0.3	$675	$202.50	11
07/09/2013	Look up info on Stromberg case per JLA email; emails regarding same.	JM	2.3	$395	$908.50	11
07/12/2013	Meeting with KG and JM regarding notice to relate cases and incoming time submissions.	JLA	0.2	$675	$135.00	11
07/12/2013	Meeting with JLA and JM regarding related cases and IPP timekeeping reports.	KG	0.2	$265	$53.00	11
07/12/2013	Meeting with JLA and KG re related cases and IPP time reports.	JM	0.2	$395	$79.00	11
07/15/2013	Review IPP timekeeping reports (0.2); Email E. Fastiff regarding time submission (0.1); Communicate with KG regarding follow-up policies (0.2).	JLA	0.5	$675	$337.50	11
07/15/2013	Respond to E. Fastiff's inquiries regarding time reports (0.2); Follow up with IPP counsel regarding new cases/association of counsel (0.3).	JLA	0.5	$675	$337.50	11
07/15/2013	Exchange emails with JLA regarding IPP timekeeping reports (0.2); Update master tracking spreadsheet (0.3).	KG	0.5	$265	$132.50	11
07/16/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
07/16/2013	Review draft order and email regarding compliance.	JLA	0.1	$675	$67.50	11
07/17/2013	Update file with recently filed related case docket entries (1.0); Email JLA regarding same (0.1).	KG	1.1	$265	$291.50	11
07/18/2013	Follow up regarding related case notice.	JLA	0.1	$675	$67.50	11
07/19/2013	Review related case orders against known/potential related cases.	KG	0.8	$265	$212.00	11
07/19/2013	Confer with JM regarding related cases and email JLA draft motion to relate (0.1); Email billing information to Stromberg counsel (0.1).	KG	0.2	$265	$53.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
07/19/2013	Review time and expense reports submitted by counsel for compliance.	JLA	0.3	$675	$202.50	11
07/19/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
07/19/2013	Email JM and KG related case motion and instructions for new co-counsel.	JLA	0.2	$675	$135.00	8
07/19/2013	Discuss related cases with KG.	JM	0.2	$395	$79.00	11
07/22/2013	Email KG regarding potential related cases identified.	JLA	0.1	$675	$67.50	11
07/22/2013	Complete docket search for new related cases and email JLA/JM regarding same.	KG	0.7	$265	$185.50	11
07/22/2013	[redacted] from co-counsel.	JLA	0.2	$675	$135.00	1
07/23/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
07/25/2013	Prepare for and have call with co-lead counsel regarding Motions to Dismiss.	JLA	0.3	$675	$202.50	8
07/25/2013	Communicate with counsel and lead counsel regarding cases to be related (0.4); Review and edit proposed stipulation (0.3); Review complaints for coordination (0.3).	JLA	1.0	$675	$675.00	8
07/25/2013	Confer with JLA regarding stip and make revisions to stip per JLA comments.	KG	0.4	$265	$106.00	8
07/25/2013	Draft stipulation regarding case relation (0.8); Discuss same with JLA and emails regarding same (0.3).	JM	1.2	$395	$474.00	8
07/26/2013	Communicate with defense counsel and revise stip regarding related cases (0.5); Email KG regarding same (0.1).	JLA	0.6	$675	$405.00	8
07/29/2013	Email from defense counsel regarding stipulation.	JLA	0.1	$675	$67.50	8
07/29/2013	Follow up with defense counsel and co-lead counsel regarding stipulation (0.3); Revise and finalize stipulation (0.2).	JLA	0.5	$675	$337.50	8
07/29/2013	Revised stipulation and proposed order per JLA.	KG	0.2	$265	$53.00	8
07/30/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
07/30/2013	Correspond with defense counsel and co-lead counsel regarding stipulation.	JLA	0.3	$675	$202.50	8
07/31/2013	Review docket re new cases and update file.	KG	0.7	$265	$185.50	11
07/31/2013	Finalize stipulation to relate cases (0.7); Review dockets regarding assigned judges and prepare courtesy copies (0.5).	KG	1.2	$265	$318.00	8
07/31/2013	Respond to counsel inquiry regarding related case; finalize stipulation; consult with KG regarding same.	JLA	0.2	$675	$135.00	8
08/13/2013	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Email JLA re same (0.1).	KG	0.4	$265	$106.00	11
08/13/2013	Follow up with KG regarding time submissions and review report regarding deficiencies.	JLA	0.3	$675	$202.50	11
08/14/2013	Review incoming time and expense reports and follow up regarding list of counsel without time.	JLA	0.2	$675	$135.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
08/14/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.5	$265	$397.50	11
08/14/2013	Follow up with KG regarding filings (0.1); Review IPP submissions regarding underlying cases and motions to dismiss (0.2).	JLA	0.3	$675	$202.50	8
08/15/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.8	$265	$212.00	11
08/15/2013	Review incoming time and expense reports.	JLA	0.2	$675	$135.00	11
08/16/2013	Review monthly time/expense submissions from IPP counsel.	JLA	0.2	$675	$135.00	11
08/16/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$265	$26.50	11
08/16/2013	Contact counsel re consolidated complaint (0.2); Review and revise filing re administrative closing of cases (0.3).	JLA	0.5	$675	$337.50	8
08/22/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$265	$79.50	11
09/06/2013	Communicate with counsel for all parties and co-counsel and prepare for CMC.	JLA	0.4	$700	$280.00	14
09/06/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/13/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
09/14/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
09/18/2013	Communicate with defense counsel, J. Zahid, and co-lead counsel regarding draft stipulation.	JLA	0.3	$700	$210.00	8
09/18/2013	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/19/2013	Review stipulation and email co-lead counsel and defendants regarding same.	JLA	0.3	$700	$210.00	8
09/27/2013	Call with B. Glackin regarding time reports and case status (0.2); Email with B. Glackin regarding same (0.2).	JLA	0.4	$700	$280.00	11
10/09/2013	Email to co-counsel regarding time records.	JLA	0.2	$700	$140.00	11
11/05/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$285	$171.00	11
11/11/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.2	$285	$342.00	11
11/21/2013	Email regarding upcoming hearing (0.1); review incoming time (0.2).	JLA	0.3	$700	$210.00	11
11/27/2013	Email with B. Glackin regarding summaries of time; meeting with KG regarding compiling the same.	JLA	0.3	$700	$210.00	11
11/27/2013	Prepare summary of all IPP firms' time and expenses to date.	KG	1.3	$285	$370.50	11
12/02/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
12/02/2013	Review draft summaries of time by law firm and email KG regarding same.	JLA	0.5	$700	$350.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
12/03/2013	Review time summary by firm and email co-lead counsel regarding same.	JLA	0.4	$700	$280.00	11
12/10/2013	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.9	$285	$541.50	11
01/07/2014	Email with co-counsel regarding time submission protocol.	JLA	0.2	$700	$140.00	11
01/08/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
01/15/2014	Review CMC draft statement and email regarding CMC.	JLA	0.4	$700	$280.00	9
01/17/2014	Review draft CMC statements from defendants and co-counsel.	JLA	0.3	$700	$210.00	9
01/21/2014	Review order regarding status conference and report regarding attorneys' fees.	KG	0.2	$285	$57.00	11
01/21/2014	Review court orders regarding MTD and time submission and meeting with KG regarding compliance, email co-leads regarding same (0.6); Follow up with defense counsel and DPPs regarding scheduling (0.2).	JLA	0.8	$700	$560.00	11
01/21/2014	Review incoming time submissions.	JLA	0.2	$700	$140.00	11
01/21/2014	Read briefs regarding CMC and comments to draft CMC statement.	JLA	0.3	$700	$210.00	8
01/22/2014	Email co-leads regarding time and draft email to all counsel re same (.3); Call with J. Zahid and follow up with lead counsel regarding compliance with orders (.2).	JLA	0.4	$700	$280.00	11
01/23/2014	Call with IPP counsel B. Gralewski regarding case status (0.1); follow up with J. Cuneo regarding lead counsel correspondence (0.2).	JLA	0.3	$700	$210.00	11
01/23/2014	Draft email to all IPP counsel regarding Court's order.	JLA	0.3	$700	$210.00	11
01/23/2014	Call with J. Zahid regarding coordination with parties on submissions (0.3); Meeting with KG regarding upcoming submissions to the Court (0.2).	JLA	0.5	$700	$350.00	11
01/23/2014	Meeting with JLA re quarterly IPP time report prepared for Court.	KG	0.2	$285	$57.00	11
01/23/2014	Review email regarding IPP counsel list and email JLA regarding same.	KG	0.2	$285	$57.00	11
01/28/2014	Follow up with co-leads and DPPs regarding time submission to court.	JLA	0.4	$700	$280.00	11
01/29/2014	Review IPP timekeeping reports and draft quarterly IPP time report for Court.	KG	1.2	$285	$342.00	11
01/30/2014	Review IPP timekeeping reports and revise quarterly IPP time report for Court (2.0); Multiple emails with co-lead counsel and JLA re same (0.5).	KG	2.5	$285	$712.50	11
01/31/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
02/01/2014	Review incoming inquiries regarding time.	JLA	0.2	$700	$140.00	11
02/04/2014	Respond to co-counsel inquiries and review order regarding telephone appearance.	JLA	0.3	$700	$210.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
02/04/2014	Finalize request for telephonic appearance and prepare chambers copy.	KG	0.3	$285	$85.50	8
02/06/2014	Prepare for CMC.	JLA	0.3	$700	$210.00	14
02/07/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/10/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Email IPP counsel re same (0.1).	KG	0.4	$285	$114.00	11
02/11/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.8	$285	$228.00	11
02/12/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
02/14/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/14/2014	Call regarding tasks for Japanese language reviewers.	JLA	0.3	$700	$210.00	11
02/21/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
02/22/2014	Email co-counsel regarding transcripts and follow up regarding Japanese language reviewers for translation tasks.	JLA	0.3	$700	$210.00	11
02/25/2014	Communicate with J. Zahid and S. Jones regarding protective order (0.3); Follow up with co-counsel regarding transcripts (0.2).	JLA	0.5	$700	$350.00	11
02/25/2014	Telephone call with IPP counsel regarding timekeeping report (0.1); Review timekeeping report and update master tracking spreadsheet (0.1); Email IPP counsel regarding errors in report (0.1).	KG	0.3	$285	$85.50	11
02/26/2014	Read document review materials and follow up with new reviewer regarding same.	JLA	1.0	$700	$700.00	11
02/26/2014	Communicate with co-lead counsel regarding training materials and reviewers (0.5); Prepare for training of reviewers (2.0).	JLA	2.5	$700	$1,750.00	11
02/26/2014	Study training materials in preparation for Japanese language document review (4.5); exchange emails with JLA and L. Chan re same (0.3).	JAL	4.8	$450	$2,160.00	7
02/27/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/27/2014	Training call with Ronnie and Josh regarding Japanese document review.	JAL	0.7	$450	$315.00	7
02/27/2014	Continued review/study training materials for Japanese language document review.	JAL	2.5	$450	$1,125.00	7
02/28/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
02/28/2014	Japanese language document review of batch Sony_JP_00001.	JAL	8.5	$450	$3,825.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
03/03/2014	Review foreign language document review materials (0.3); Train new foreign language reviewer (1.0); Follow up with L. Chan regarding same (0.2).	JLA	1.5	$700	$1,050.00	11
03/03/2014	Review question and descriptions from foreign language reviewer and draft response (0.3); Call with L. Chan regarding document review and tracking acronyms (0.2).	JLA	0.5	$700	$350.00	11
03/03/2014	Japanese language document review of batch PAN_JP_0004 (4.2); telephone call with JLA re training and goals/focus for document review (0.5).	JAL	4.7	$450	$2,115.00	7
03/04/2014	Follow up regarding Japanese language review and inquiry for B. Gralewski (0.2); Email co-lead counsel regarding assignments and requests from counsel (0.2).	JLA	0.4	$700	$280.00	11
03/04/2014	Japanese language document review of batch PAN_JP_0004.	JAL	9.5	$450	$4,275.00	7
03/05/2014	Japanese language document review of batch PAN_JP_0004 (8.7); exchange emails with L. Chan and H. Rim re hot/privileged documents (0.6).	JAL	9.3	$450	$4,185.00	7
03/06/2014	Japanese language document review of batch PAN_JP_0004.	JAL	8.0	$450	$3,600.00	7
03/07/2014	Japanese language document review of batch PAN_JP_0004.	JAL	7.5	$450	$3,375.00	7
03/10/2014	Japanese language document review of batch PAN_JP_0004 (4.0); exchange emails with L. Chan re batch [redacted] Panasonic PCP_0002 (0.5); Japanese language document review of batch [redacted] Panasonic PCP_0002 (5.5).	JAL	10.0	$450	$4,500.00	7
03/11/2014	Japanese language document review of batch [redacted] Panasonic PCP_0002.	JAL	9.0	$450	$4,050.00	7
03/12/2014	Exchange emails with JLA re document review status (0.3); Japanese language document review of batch [redacted] Panasonic PCP_0002 (8.4).	JAL	8.7	$450	$3,915.00	7
03/13/2014	Exchange emails with J. Moy re Sanyo, Tocado (0.3); Japanese language document review of batch [redacted] Panasonic PCP_0002 (5.2).	JAL	5.5	$450	$2,475.00	7
03/14/2014	Review sample hot documents (0.4); Japanese language document review of batch [redacted]1 (6.3).	JAL	6.7	$450	$3,015.00	7
03/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
03/17/2014	Email J. Moy re documents .responsive to her inquiry re incentives (0.2); Japanese language document review of batch [redacted]1 (9.0).	JAL	9.2	$450	$4,140.00	7
03/18/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
03/18/2014	Japanese language document review of batch [redacted]1 (8.5); email L. Chan and S. Kim-Helms re Korean language documents (0.2).	JAL	8.7	$450	$3,915.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
03/19/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
03/19/2014	Japanese language document review of batch [redacted]1 (8.9); email J. Moy re [redacted] documents (0.3).	JAL	9.2	$450	$4,140.00	7
03/20/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
03/20/2014	Japanese language document review of batch [redacted]1.	JAL	6.0	$450	$2,700.00	7
03/21/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
03/21/2014	Japanese language document review of batch [redacted]1 (6.6).	JAL	6.7	$450	$3,015.00	7
03/26/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
03/27/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
04/01/2014	Review orders and update calendar.	KG	0.5	$285	$142.50	11
04/04/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
04/09/2014	Email KG regarding analysis of counsel's time and report for court.	JLA	0.2	$700	$140.00	11
04/09/2014	Review IPP timekeeping reports and update master tracking spreadsheet (1.2); Draft list of delinquent firms for JLA (0.2).	KG	1.4	$285	$399.00	11
04/11/2014	Review time reports and respond to email from IPP co-counsel regarding time reports.	JLA	0.3	$700	$210.00	11
04/15/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$285	$171.00	11
04/15/2014	Email JLA regarding delinquent firms re quarterly IPP timekeeping report due to Court 04/30.	KG	0.3	$285	$85.50	11
04/15/2014	Email with L. Chan regarding time report for court (0.1); Communicate with KG regarding reporting and review KG's report regarding delinquent time (0.3).	JLA	0.4	$700	$280.00	11
04/16/2014	Meeting with KG regarding time reports (0.3); Draft email to all IPP counsel regarding reports (0.6).	JLA	0.9	$700	$630.00	11
04/17/2014	Correspond with various IPP counsel regarding time/expense requirements and upcoming submission.	JLA	0.4	$700	$280.00	11
04/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
04/18/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
04/21/2014	Follow up with LCHB regarding time submission to court and follow up with KG regarding report (0.2); respond to questions from co-counsel regarding time submissions (0.3).	JLA	0.5	$700	$350.00	11
04/21/2014	Telephone call with IPP counsel regarding timekeeping report.	KG	0.1	$285	$28.50	11
04/21/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$285	$171.00	11
04/22/2014	Email L. Chan regarding LCHB time submission.	JLA	0.1	$700	$70.00	11
04/22/2014	Confer with JLA regarding IPP timekeeping reports (0.1); Review emails and email JLA regarding most recent updates.	KG	0.3	$285	$85.50	11
04/22/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.5); Prepare status list and draft quarterly IPP timekeeping report for JLA review (0.3).	KG	0.8	$285	$228.00	11
04/23/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.9	$285	$541.50	11
04/23/2014	Email KG regarding updated time reports received and review incoming time/expense reports.	JLA	0.2	$700	$140.00	11
04/23/2014	Email KG regarding NECT documents received.	JLA	0.1	$700	$70.00	11
04/25/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$285	$171.00	11
04/27/2014	Call with KG regarding time report (0.1); Review time reports and email co-leads (0.1).	JLA	0.2	$700	$140.00	11
04/28/2014	Telephone call with JLA regarding quarterly IPP timekeeping report (0.2); Finalize and email same to co-lead counsel (0.4); Update master tracking spreadsheet for next quarter (0.4).	KG	1.0	$285	$285.00	11
04/30/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Email JLA regarding same (0.1); Telephone call with L. Chan regarding same (0.1).	KG	0.5	$285	$142.50	11
04/30/2014	Follow up regarding time summaries for court.	JLA	0.2	$700	$140.00	11
05/01/2014	Email L. Chan regarding time submission and review same.	JLA	0.2	$700	$140.00	11
05/06/2014	Follow up with co-lead counsel regarding hearing.	JLA	0.2	$700	$140.00	14
05/08/2014	Review time reports to prepare for hearing.	JLA	0.2	$700	$140.00	11
05/12/2014	Follow up emails regarding scheduling.	JLA	0.2	$700	$140.00	11
05/12/2014	Email and telephone call with J. Zahid regarding scheduling, the court's schedule, and update regarding hearing.	JLA	0.3	$700	$210.00	11
05/12/2014	Call with J. Zahid and revise stipulation (0.2); Email co-leads for IPPs regarding stip (0.1).	JLA	0.3	$700	$210.00	8
05/12/2014	Draft stipulation per JLA.	KG	0.6	$285	$171.00	8
05/12/2014	Draft proposed order for Court (.3); Email KG regarding preparation of stipulation (.1); Call to B. Glackin regarding stipulation (.2).	JLA	0.6	$700	$420.00	8
05/13/2014	Follow up with parties regarding scheduling.	JLA	0.2	$700	$140.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
05/13/2014	Multiple emails with IPP, DPP, and Dfs regarding scheduling and stipulation.	JLA	0.4	$700	$280.00	11
05/13/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
05/14/2014	Email with J. Zahid and M. Scarborough regarding hearing and proposed order and draft proposed order (.3); Email IPP co-leads, DPPs and Dfs regarding same (.1).	JLA	0.4	$700	$280.00	8
05/14/2014	Email with M. Scarborough regarding proposed order and follow up with J. Zahid regarding same (0.2); Finalize proposed order for filing (0.1).	JLA	0.3	$700	$210.00	8
05/14/2014	Email J. Zahid and review proposed order (0.3); Revise proposed order and circulate to co-counsel (0.2); Call with J. Zahid and follow up with defense counsel (0.3).	JLA	0.8	$700	$560.00	8
05/14/2014	Finalize proposed order.	KG	0.2	$285	$57.00	8
05/15/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
05/19/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/20/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/23/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/23/2014	Email with L. Chan and J. Moy regarding motion to dismiss (0.1); Meeting with KG and follow-up emails regarding motion to dismiss projects (0.2).	JLA	0.3	$750	$225.00	8
05/25/2014	Cite-check and revise oppositions to motions to dismiss (2.7); Emails with team regarding same (0.3).	KG	3.0	$285	$855.00	8
05/26/2014	Cite-check and revise oppositions to motions to dismiss (10.3); Emails with team regarding same (0.5).	KG	10.8	$285	$3,078.00	8
05/26/2014	Email regarding motion to dismiss drafts.	JLA	0.3	$700	$210.00	8
05/27/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/27/2014	Email regarding motion to dismiss drafts.	JLA	0.2	$700	$140.00	8
05/27/2014	Emails regarding motion to dismiss briefs.	JLA	0.2	$700	$140.00	8
05/27/2014	Telephone call with L. Chan (0.2); Cite-check and revise oppositions to motions to dismiss (3.1); Emails with team regarding same (0.4).	KG	3.7	$285	$1,054.50	8
06/03/2014	Email with J. Zahid regarding additional cases filed and inquiries from court (0.2); Investigate at request of Court and follow up with J. Zahid with recommended course of action (0.5).	JLA	0.7	$700	$490.00	1
06/03/2014	Study training manual and review amended complaint (6.0); prepare for training call (0.3); review and update terms list and key people list (2.0).	JAL	8.3	$450	$3,735.00	7
06/04/2014	Research counsel information for JLA.	KG	0.2	$285	$57.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
06/04/2014	Training call (1.5); review/study training manual and related materials (2.0).	JAL	3.5	$450	$1,575.00	7
06/05/2014	Review prior orders regarding administrative termination (0.1); Call IPP counsel regarding pending dockets and administrative termination; email J. Zahid with update (0.5).	JLA	0.6	$700	$420.00	11
06/05/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	8.5	$450	$3,825.00	7
06/06/2014	Calls and email to IPP co-counsel regarding administrative termination cases; follow up with J. Zahid regarding same.	JLA	0.8	$700	$560.00	11
06/06/2014	Email with IPP co-counsel regarding complaints and administrative termination.	JLA	0.3	$700	$210.00	11
06/06/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	9.8	$450	$4,410.00	7
06/09/2014	Call B. Glackin regarding [redacted] and draft email [redacted]	JLA	0.7	$700	$490.00	8
06/09/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
06/09/2014	Email to [redacted] (0.1); [redacted] and report to co-leads [redacted] (0.3).	JLA	0.4	$700	$280.00	8
06/09/2014	Email J. Zahid regarding status update.	JLA	0.1	$750	$75.00	11
06/10/2014	Follow up regarding [redacted] (0.1); Follow up regarding foreign language review (0.2).	JLA	0.3	$700	$210.00	11
06/10/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	5.8	$450	$2,610.00	7
06/11/2014	Email multiple IPP co-counsel regarding timekeeping requirements.	JLA	0.3	$700	$210.00	11
06/11/2014	Email with co-counsel [redacted]	JLA	0.2	$700	$140.00	8
06/11/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	6.8	$450	$3,060.00	7
06/12/2014	Draft email to [redacted] and the court's inquiry regarding administrative termination of cases (0.2); Review and confirm [redacted] (0.2).	JLA	0.4	$750	$300.00	8
06/12/2014	Email with [redacted] (0.2); Review [redacted] from J. Verducci and follow up with co-counsel regarding same (0.4).	JLA	0.4	$700	$280.00	8
06/12/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	8.8	$450	$3,960.00	7
06/13/2014	Calls with S. Williams and follow-up email to co-leads and co-counsel (0.3); Draft email re [redacted] (0.3).	JLA	0.6	$700	$420.00	8

Date	Description	Initials	Hours	Rate	Total	Task Code
06/13/2014	Telephone call with J. Zahid regarding inquiry on open cases (0.2); Telephone calls with B. Glackin and S. Williams regarding [redacted] (0.2).	JLA	0.4	$700	$280.00	11
06/13/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	8.8	$450	$3,960.00	7
06/16/2014	Email [redacted] (.2); Draft response to court regarding 7 open cases; email co-leads and DPP liaison counsel with updates re same (.4).	JLA	0.6	$700	$420.00	1
06/16/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	7.8	$450	$3,510.00	7
06/17/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
06/17/2014	Telephone call with [redacted]	JLA	0.3	$700	$210.00	8
06/17/2014	Follow up with co-lead counsel regarding administrative closure and email J. Zahid with proposed language for court.	JLA	0.8	$700	$560.00	11
06/17/2014	Japanese language document review of assigned documents from NEC Japanese folder (7.3); review NEC Summary document circulated by H. Rim (0.5).	JAL	7.8	$450	$3,510.00	7
06/18/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	7.5	$450	$3,375.00	7
06/19/2014	Email with [redacted]	JLA	0.2	$700	$140.00	8
06/19/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	4.0	$450	$1,800.00	7
06/20/2014	Review documentation, email, and notes regarding [redacted] (0.4); Draft summary of findings for co-lead counsel (0.2).	JLA	0.6	$700	$420.00	11
06/20/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	3.0	$450	$1,350.00	7
06/23/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	8.8	$450	$3,960.00	7
06/24/2014	Update and circulate Kanji cast of characters (0.5); Japanese language document review of assigned documents from NEC Japanese folder (8.5).	JAL	9.0	$450	$4,050.00	7
06/25/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	8.3	$450	$3,735.00	7
06/27/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	4.0	$450	$1,800.00	7
06/30/2014	Emails and telephone calls with S. Williams regarding case management issues.	JLA	0.4	$700	$280.00	11
06/30/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	9.3	$450	$4,185.00	7
07/01/2014	Email R. Spiegel regarding Hitachi class certification project.	JLA	0.2	$700	$140.00	10
07/01/2014	Japanese language document review of assigned documents from NEC Japanese folder (6.1); conference call with H. Rim and Ronnie (0.9).	JAL	7.0	$450	$3,150.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
07/02/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	6.6	$450	$2,970.00	7
07/03/2014	Japanese language document review of assigned documents from NEC Japanese folder.	JAL	7.0	$450	$3,150.00	7
07/08/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
07/09/2014	Review incoming email from co-counsel regarding time submissions.	JLA	0.3	$700	$210.00	11
07/09/2014	Email to L. Weaver explaining administrative termination.	JLA	0.2	$700	$140.00	11
07/09/2014	Email co-leads [redacted]	JLA	0.3	$700	$210.00	8
07/10/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
07/11/2014	Meeting with KG regarding Hitachi class certification project (0.3); email J. Verducci regarding document review for same (0.1).	JLA	0.4	$700	$280.00	10
07/11/2014	Review correspondence with co-counsel regarding timesheets.	JLA	0.2	$700	$140.00	11
07/11/2014	Email co-lead counsel regarding hearing and discovery hearing.	JLA	0.3	$700	$210.00	14
07/11/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Email IPP counsel regarding inconsistencies (0.1).	KG	0.3	$285	$85.50	11
07/14/2014	Review incoming inquiries regarding document review/time submission.	JLA	0.3	$700	$210.00	11
07/14/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
07/15/2014	Email co-lead counsel regarding document review projects.	JLA	0.3	$700	$210.00	11
07/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
07/18/2014	Follow up with IPP counsel regarding Batteries time submission reports.	JLA	0.3	$700	$210.00	11
07/21/2014	Email co-counsel regarding requirements for time and expense reports.	JLA	0.2	$700	$140.00	11
07/22/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
07/24/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
07/30/2014	Compile quarterly IPP timekeeping report for Court.	KG	0.3	$285	$85.50	11
07/30/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
07/30/2014	Review report for court; email KG regarding same.	JLA	0.3	$700	$210.00	11
07/31/2014	Follow up regarding protective order and document review.	JLA	0.2	$700	$140.00	11
08/04/2014	Email J. Zahid regarding hearing.	JLA	0.1	$700	$70.00	14

Date	Description	Initials	Hours	Rate	Total	Task Code
08/05/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
08/05/2014	Follow up with document reviewers; email KG regarding hearing preparation.	JLA	0.2	$700	$140.00	11
08/06/2014	Telephone call with R. Speigel regarding document review and class certification project for Hitachi.	JLA	0.4	$700	$280.00	10
08/07/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
08/08/2014	Meeting with S. Williams regarding [redacted]	JLA	0.3	$700	$210.00	8
08/11/2014	Review incoming time reports.	JLA	0.2	$700	$140.00	11
08/12/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
08/12/2014	Email [redacted]	JLA	0.3	$700	$210.00	8
08/12/2014	Review amended complaint and document review manual in preparation for Japanese language review.	MXU	6.0	$425	$2,550.00	7
08/12/2014	Draft IPP statement regarding administrative termination.	JLA	0.8	$750	$600.00	11
08/13/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
08/13/2014	Finalize draft compliance statement and email S. Williams regarding same.	JLA	0.5	$700	$350.00	8
08/14/2014	Review updates to document review protocol, list of key terms, templates for document review and working cast of characters for Japanese document review.	MXU	2.0	$425	$850.00	7
08/14/2014	Conference call with co-counsel re status of document review.	MXU	1.0	$425	$425.00	7
08/14/2014	Document review training for Catalyst.	MXU	1.0	$425	$425.00	7
08/18/2014	Email with S. Williams regarding compliance statement (0.1); Review draft and email co-lead counsel regarding same (0.2).	JLA	0.3	$700	$210.00	8
08/21/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
08/21/2014	Finalize and email regarding statement of compliance (0.3); Email with L. Chan and S. Williams regarding filing (0.1).	JLA	0.4	$700	$280.00	8
08/21/2014	Finalize compliance statement and prepare chambers copy (0.1); Email JLA re same (0.1).	KG	0.2	$285	$57.00	8
08/25/2014	Communicate with R. Spiegel and MXU re class certification project and evidence.	JLA	0.5	$700	$350.00	10
08/25/2014	Review top 20 Japanese hot docs for reference.	MXU	1.5	$425	$637.50	7
08/25/2014	Conference call with H. Rim at Lieff Cabraser re Japanese hot docs and coding.	MXU	0.5	$425	$212.50	7
08/25/2014	Review Sanyo Japanese documents batch 1.	MXU	4.0	$425	$1,700.00	7
08/26/2014	Email with DAP and DPP liaisons regarding hearing; follow up with co-leads regarding same.	JLA	0.3	$700	$210.00	14

Date	Description	Initials	Hours	Rate	Total	Task Code
08/26/2014	Begin document review of Sony Japanese batch 1.	MXU	4.7	$425	$1,997.50	7
08/26/2014	Document review of Sanyo Japanese batch 1.	MXU	3.3	$425	$1,402.50	7
08/27/2014	Call clerk regarding compliance conference and follow-up emails regarding same (0.2); Email co-leads, DAPs, DPPS, regarding status (0.3); Respond to email follow up from court (0.1).	JLA	0.6	$700	$420.00	14
08/27/2014	Document review of Sony Japanese batch 1, batch 2, and start batch 3.	MXU	9.0	$425	$3,825.00	7
08/28/2014	Email from F. Stone; review orders regarding compliance statement and hearing; follow up regarding same.	JLA	0.3	$700	$210.00	14
08/28/2014	Document review of Sony Japanese batch 3, batch 4, and start batch 5.	MXU	7.5	$425	$3,187.50	7
08/29/2014	Review privilege log research and past correspondence; email J. Moy and L. Chan regarding same.	JLA	0.3	$700	$210.00	6
09/02/2014	Finish document review of Sony Japanese batch 5; start and finish document review of Sony Japanese batch 6.	MXU	7.0	$425	$2,975.00	7
09/02/2014	Telephone call with H. Rim at Lieff Cabraser re coding issues.	MXU	1.0	$425	$425.00	7
09/03/2014	Japanese language document review of NEC [redacted] Hatakeyama/Folder 2.	MXU	7.0	$425	$2,975.00	7
09/03/2014	Revise coding of relevant/hot docs from last week per instructions from H. Rim at Lieff Cabraser.	MXU	1.0	$425	$425.00	7
09/04/2014	Start Japanese language document review of NEC [redacted] Hatakeyama/Folder 1 (coded Folder 2 before Folder 1 per instruction from H. Rim at Lieff Cabraser).	MXU	8.0	$425	$3,400.00	7
09/05/2014	Japanese language document review of NEC [redacted] Hatakeyama/Folder 1.	MXU	4.5	$425	$1,912.50	7
09/06/2014	Finish Japanese language document review of NEC [redacted] Hatakeyama/Folder 1; start doc review of NEC [redacted] Hatakeyama/Folder 3.	MXU	4.5	$425	$1,912.50	7
09/08/2014	Review draft letter re discovery and letter from defendants re same.	JLA	0.2	$700	$140.00	6
09/08/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/08/2014	Japanese language document review of NEC [redacted] Hatakeyama/Folder 3; start NEC [redacted] Hatakeyama/Folder 4.	MXU	6.0	$425	$2,550.00	7
09/09/2014	Finish Japanese language document review of NEC [redacted] Hatakeyama/Folder 4; start Japanese language document review of NEC [redacted] Hatakeyama/Folder 5.	MXU	7.0	$425	$2,975.00	7
09/10/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
09/10/2014	Finish Japanese language document review of NEC [redacted] Hatakeyama/Folder 5.	MXU	7.0	$425	$2,975.00	7
09/11/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
09/11/2014	Start Japanese language document review of NEC [redacted] Hatakeyama/Folder 6.	MXU	7.0	$425	$2,975.00	7
09/12/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/12/2014	Finish Japanese language document review of NEC [redacted] Hatakeyama/Folder 6.	MXU	8.0	$425	$3,400.00	7
09/15/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
09/15/2014	Follow up re time submissions.	JLA	0.2	$700	$140.00	11
09/15/2014	Email with MXU and H. Rim re doc review.	JLA	0.1	$700	$70.00	11
09/15/2014	Finish Japanese language document review of [redacted] Hatakeyama folders (0.4); Conference call with H. Rim at Lieff Cabraser (0.1); Begin Japanese language document review of [redacted] 0001 Folder 1 (0.2).	MXU	0.7	$425	$297.50	7
09/16/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/16/2014	Continue Japanese language document review of [redacted] 0001 Folder 1.	MXU	8.0	$425	$3,400.00	7
09/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
09/17/2014	Finish Japanese language document review of [redacted] 0001 Folder 1; start Japanese language document review of [redacted] 0001 Folder 2.	MXU	9.5	$425	$4,037.50	7
09/18/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/18/2014	Finish Japanese language document review of [redacted] 0001 Folder 2; start Japanese language document review of [redacted] 0001 Folder 3.	MXU	7.5	$425	$3,187.50	7
09/19/2014	Continue Japanese language document review of [redacted] 0001 Folder 3.	MXU	7.0	$425	$2,975.00	7
09/22/2014	Finish Japanese language document review of [redacted] 0001 Folder 3.	MXU	7.5	$425	$3,187.50	7
09/23/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/23/2014	Conference call with H. Rim at LCHB and revisions of [redacted] 0001 Folders 1-4.	MXU	3.8	$425	$1,615.00	7
09/23/2014	Japanese language document review of [redacted] 0001 Folder 4 (documents 95-116 only).	MXU	1.0	$425	$425.00	7
09/24/2014	Begin Japanese language document review of [redacted] 0002.	MXU	5.0	$425	$2,125.00	7
09/25/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
09/25/2014	Continue Japanese language document review of [redacted] 0002.	MXU	6.0	$425	$2,550.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
09/26/2014	Continue Japanese language document review of [redacted] 0002.	MXU	6.0	$425	$2,550.00	7
09/29/2014	Review preservation letter (0.1); Email J. Kim re GKN and preservation (0.1); Email D. Lambrinos re client follow-up (0.1).	JLA	0.3	$700	$210.00	3
09/29/2014	Continue Japanese language document review of [redacted] 0002.	MXU	8.0	$425	$3,400.00	7
09/30/2014	Conference call with lead counsel and other document reviewers.	MXU	0.2	$425	$85.00	7
09/30/2014	Continue Japanese language document review of [redacted] 0002.	MXU	3.3	$425	$1,402.50	7
10/01/2014	Email with co-counsel and co-lead counsel re client preservation letter and follow up re same.	JLA	0.3	$700	$210.00	3
10/01/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/01/2014	Continue Japanese language document review of [redacted] 0002.	MXU	8.0	$425	$3,400.00	7
10/02/2014	Call with and letter to S. Poynter [redacted].	JLA	0.5	$700	$350.00	3
10/02/2014	Follow up with [redacted] class rep [redacted] (0.1); Review letter [redacted] and message to S. Poynter re same (0.2).	JLA	0.3	$700	$210.00	3
10/02/2014	Continue Japanese language document review of [redacted] 0002.	MXU	8.5	$425	$3,612.50	7
10/03/2014	Finish Japanese language document review of [redacted] 0002.	MXU	4.0	$425	$1,700.00	7
10/06/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/06/2014	Begin Japanese language document review of [redacted] 0003.	MXU	3.0	$425	$1,275.00	7
10/06/2014	Revisions to [redacted] 0002.	MXU	1.5	$425	$637.50	7
10/07/2014	Continue Japanese language document review of [redacted] 0003.	MXU	8.0	$425	$3,400.00	7
10/07/2014	Prepare and sent Hot/relevant document coding memo to H. Rim at LHCB.	MXU	0.5	$425	$212.50	7
10/08/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
10/08/2014	Review and revise named plaintiff declaration and draft summary for lead counsel.	JLA	0.3	$700	$210.00	3
10/08/2014	Review materials from plaintiff [redacted] (0.4); Follow up with [redacted] re declaration and production question (0.3); Email co-lead counsel re update (0.2).	JLA	0.9	$700	$630.00	3
10/08/2014	Continue Japanese language document review of [redacted] 0003.	MXU	8.0	$425	$3,400.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
10/09/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/09/2014	Continue Japanese language document review of [redacted]0003.	MXU	8.0	$425	$3,400.00	7
10/09/2014	Prepare and send Hot/relevant document coding memo to H. Rim at LCHB.	MXU	0.5	$425	$212.50	7
10/10/2014	Continue Japanese language document review of [redacted]0003.	MXU	8.0	$425	$3,400.00	7
10/13/2014	Finish Japanese language document review of [redacted]0003; begin Japanese language document review of [redacted]0006.	MXU	9.0	$425	$3,825.00	7
10/14/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.5); Emails with IPP counsel regarding potential errors in reports (0.3).	KG	0.8	$285	$228.00	11
10/14/2014	Continue Japanese language document review of [redacted]0006.	MXU	4.0	$425	$1,700.00	7
10/15/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
10/15/2014	Email with J. Kim and S. Williams regarding [redacted] revise letters regarding same.	JLA	0.4	$700	$280.00	8
10/15/2014	Continue Japanese language document review of [redacted]0006.	MXU	7.0	$425	$2,975.00	7
10/16/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/16/2014	Continue Japanese language document review of [redacted]0006.	MXU	4.0	$425	$1,700.00	7
10/17/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/17/2014	Review and revise draft ESI letter (0.3); Email co-lead counsel regarding same and review ESI checklist (0.2).	JLA	0.5	$700	$350.00	3
10/17/2014	Email with co-lead counsel regarding plaintiff [redacted] (0.2); Review draft ESI compliance letter and email [redacted] regarding [redacted] (0.3).	JLA	0.5	$700	$350.00	3
10/17/2014	Review and revise ESI letter and email instructions to co-counsel for class representative declarations.	JLA	0.3	$700	$210.00	3
10/17/2014	Continue Japanese language document review of [redacted]0006.	MXU	6.0	$425	$2,550.00	7
10/20/2014	Continue Japanese language document review of [redacted]0006	MXU	5.8	$425	$2,465.00	7
10/21/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
10/21/2014	Continue Japanese language document review of [redacted]0006	MXU	5.0	$425	$2,125.00	7
10/22/2014	Respond to co-lead counsel request for documents.	KG	0.1	$285	$28.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
10/23/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
10/23/2014	Continue Japanese language document review of [redacted]0006.	MXU	3.5	$425	$1,487.50	7
10/24/2014	Finish Japanese language document review of [redacted]0006.	MXU	2.0	$425	$850.00	7
10/25/2014	Begin Japanese language document review of [redacted]0008.	MXU	9.0	$425	$3,825.00	7
10/27/2014	Email J. Zahid regarding CMC and prepare for CMC.	JLA	0.4	$700	$280.00	14
10/27/2014	Continue Japanese language document review of [redacted]0008.	MXU	8.0	$425	$3,400.00	7
10/28/2014	Continue Japanese language document review of [redacted]0008; conference call with document reviewers.	MXU	6.5	$425	$2,762.50	7
10/29/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
10/29/2014	Finish Japanese language document review of [redacted]0008; begin Japanese language document review of [redacted]0010.	MXU	11.0	$425	$4,675.00	7
10/30/2014	Prepare for CMC.	JLA	0.3	$700	$210.00	14
10/30/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
10/30/2014	Respond to email from co-counsel regarding update.	JLA	0.2	$700	$140.00	11
10/30/2014	Review draft time submissions and follow up with co-lead and co-counsel regarding missing time (0.3); Call with KG regarding same (0.1).	JLA	0.4	$700	$280.00	11
10/30/2014	Continue Japanese language document review of [redacted]0010.	MXU	8.0	$425	$3,400.00	7
10/31/2014	Additional follow up with L. Chan and KG regarding completing time submission for court (0.2); Review final draft (0.2); Telephone call with KG regarding same (0.1).	JLA	0.5	$700	$350.00	11
10/31/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.8); Emails regarding quarterly IPP timekeeping report for Court (0.2).	KG	1.0	$285	$285.00	11
11/01/2014	Continue Japanese language document review of [redacted]0010.	MXU	3.0	$425	$1,275.00	7
11/03/2014	Follow up regarding hearing with J. Zahid.	JLA	0.1	$700	$70.00	14
11/03/2014	Review IPP timekeeping report and update master tracking spreadsheet (0.1); Update chart structure for new quarter (0.3).	KG	0.4	$285	$114.00	11
11/03/2014	Finish Japanese language document review of [redacted]0010; begin Japanese language document review of [redacted]0010.	MXU	10.5	$425	$4,462.50	7
11/04/2014	Email co-counsel regarding incomplete time/expense records.	JLA	0.2	$700	$140.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
11/04/2014	Finish Japanese language document review of [redacted] 0010; conference call with document reviewers; Japanese language document review of Chinese Review -> foreign language Review - JPN; begin Japanese language document review of J Review Batches -> Hitachi Uncoded.	MXU	8.0	$425	$3,400.00	7
11/05/2014	Continue Japanese language document review of J Review Batches -> Hitachi Uncoded.	MXU	9.5	$425	$4,037.50	7
11/06/2014	Continue Japanese language document review of J Review Batches -> Hitachi Uncoded.	MXU	7.5	$425	$3,187.50	7
11/07/2014	Finish Japanese language document review of J Review Batches -> Hitachi Uncoded.	MXU	6.0	$425	$2,550.00	7
11/10/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
11/10/2014	Begin document review of batches in Sony English, bates range SEL-DOJE-000133065—SEL-DOJE-000170435.	MXU	7.0	$350	$2,450.00	7
11/11/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.5); Emails with IPP counsel regarding same (0.2).	KG	0.7	$285	$199.50	11
11/11/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000133676—SEL-DOJE-000164677.	MXU	5.0	$350	$1,750.00	7
11/12/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000132912—SEL-DOJE-000134127.	MXU	5.0	$350	$1,750.00	7
11/13/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
11/13/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000145987 —SEL-DOJE-000160324.	MXU	6.0	$350	$2,100.00	7
11/14/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000145922—SEL-DOJE-000173493.	MXU	6.0	$350	$2,100.00	7
11/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Email IPP counsel regarding same (0.1).	KG	0.4	$285	$114.00	11
11/17/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000145989—SEL-DOJE-000164713.	MXU	2.8	$350	$980.00	7
11/18/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
11/18/2014	Continue document review of batches in Sony English (New Review).	MXU	1.0	$350	$350.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
11/19/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
11/19/2014	Telephone call with R. Spiegel regarding status and assignments.	JLA	0.1	$700	$70.00	11
11/19/2014	Continue document review of batches in Sony English, bates range SEL-DOJE-000146043—SEL-DOJE-000166350.	MXU	3.0	$350	$1,050.00	7
11/20/2014	Follow up with co-counsel regarding billing questions.	JLA	0.2	$700	$140.00	11
11/20/2014	Revision of prior coding, bates ranges NECT00003447—NECT00021091, S-DOJ0090073—S-DOJ0187225, and SEL-DOJE-000061682—SEL-DOJE-000165259N.	MXU	3.0	$425	$1,275.00	7
11/21/2014	Continue document review of batches in Sony English, bates ranges MAX-P-009525—MAX-P-009555, NECT00003447—NECT00026187, P-DOJ0010217—P-DOJ0116770, S-DOJ0089096—S-DOJ0182693N, and SEL-DOJE-000050327—SEL-DOJE-000173376.	MXU	9.0	$350	$3,150.00	7
11/22/2014	Finish document review of batches in Sony English (New Review).	MXU	4.0	$350	$1,400.00	7
11/24/2014	Revise previous coding; begin document review of Sanyo Japanese, bates ranges P-DOJ0108784—P-DOJ0108885 and S-DOJ0074793—S-DOJ0075056.	MXU	9.0	$425	$3,825.00	7
11/25/2014	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
11/25/2014	Document review of Sanyo Japanese, bates range S-DOJ0074793—S-DOJ0075798.	MXU	9.0	$425	$3,825.00	7
11/26/2014	Document review of Sanyo Japanese, bates range S-DOJ0075799—S-DOJ0183772.	MXU	6.3	$425	$2,677.50	7
11/29/2014	Document review of Sanyo Japanese.	MXU	7.0	$425	$2,975.00	7
12/01/2014	Document review of Sanyo Japanese, bates range S-DOJ0183703—S-DOJ0183953.	MXU	4.0	$425	$1,700.00	7
12/02/2014	Document review of Sanyo Japanese, bates range S-DOJ0183953—S-DOJ0184246.	MXU	6.0	$425	$2,550.00	7
12/03/2014	Finish document review of Sanyo Japanese and begin document review of Sony Japanese, bates range S-DOJ0184027—S-DOJ0184554.	MXU	9.0	$425	$3,825.00	7
12/04/2014	Finish document review of Sony Japanese and begin review of Panasonic Japanese, bates ranges P-DOJ0001407—P-DOJ0005550N and SEL-DOJE-000139159—SEL-DOJE-000173914.	MXU	7.0	$425	$2,975.00	7
12/05/2014	Follow up with S. Scarlett regarding discovery plan and orders (0.2); Communicate with co-counsel regarding [redacted] for discovery plan (0.2).	JLA	0.4	$700	$280.00	3
12/05/2014	Document review of Panasonic Japanese.	MXU	3.0	$425	$1,275.00	7
12/08/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
12/08/2014	Continue document review of Panasonic Japanese, bates ranges P-DOJ0001482—P-DOJ0121331.	MXU	6.0	$425	$2,550.00	7
12/09/2014	Email with co-leads regarding discovery plan (0.2); Follow up with co-counsel regarding named plaintiffs (0.2).	JLA	0.4	$700	$280.00	3
12/09/2014	Finish document review of Panasonic Japanese, bates range P-DOJ0005034—P-DOJ0124444.	MXU	8.0	$425	$3,400.00	7
12/10/2014	Begin document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0003	MXU	8.0	$425	$3,400.00	7
12/12/2014	Continue document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0003	MXU	8.0	$425	$3,400.00	7
12/13/2014	Finish document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0003	MXU	4.0	$425	$1,700.00	7
12/15/2014	Revise document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0003	MXU	4.0	$425	$1,700.00	7
12/16/2014	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
12/17/2014	Review IPP timekeeping reports and update master tracking spreadsheet (1.6); Multiple emails with IPP counsel regarding same (0.4).	KG	2.0	$285	$570.00	11
12/17/2014	Finish revising document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0003; begin document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0005	MXU	8.5	$425	$3,612.50	7
12/18/2014	Document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0005	MXU	7.8	$425	$3,315.00	7
12/19/2014	Email L. Chan regarding discovery hearing and review memo regarding same.	JLA	0.2	$700	$140.00	11
12/19/2014	Finish document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0005; begin document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0007	MXU	4.0	$425	$1,700.00	7
12/20/2014	Continue document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0007	MXU	6.0	$425	$2,550.00	7
12/22/2014	Continue document review of Japanese searches -> Phase 1 documents -> [redacted]Phase1 -> [redacted]P1_0007	MXU	5.0	$425	$2,125.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
12/23/2014	Continue document review of Japanese searches -> Phase 1 documents -> [redacted] Phase1 -> [redacted] P1_0007	MXU	7.0	$425	$2,975.00	7
12/26/2014	Finish document review of Japanese searches -> Phase 1 documents -> [redacted] Phase1 -> [redacted] P1_0007	MXU	3.0	$425	$1,275.00	7
12/27/2014	Continue document review of Japanese searches -> Phase 1 documents -> SONY Jt Review -> SonyComplaint_0001	MXU	4.0	$425	$1,700.00	7
01/04/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.0	$285	$285.00	11
01/05/2015	Document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00001	MXU	6.0	$425	$2,550.00	7
01/06/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
01/06/2015	Conference call with other document reviewers; finish document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00001	MXU	10.0	$425	$4,250.00	7
01/07/2015	Document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00004	MXU	6.3	$425	$2,677.50	7
01/08/2015	Email JLA regarding delinquent IPP timekeeping reports.	KG	0.1	$285	$28.50	11
01/08/2015	Review chart regarding delinquent and incomplete time and email KG regarding same.	JLA	0.3	$700	$210.00	11
01/08/2015	Document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00004	MXU	3.5	$425	$1,487.50	7
01/09/2015	Document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00004	MXU	5.0	$425	$2,125.00	7
01/10/2015	Finish document review of Japanese searches -> SONY Jt Review -> SonyComplaint_00004	MXU	6.0	$425	$2,550.00	7
01/12/2015	Document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0004	MXU	4.5	$425	$1,912.50	7
01/13/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
01/13/2015	Telephone call with R. Speigel regarding class certification project.	JLA	0.2	$700	$140.00	10
01/13/2015	Conference call with other document reviewers; finish document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0004; begin document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0008	MXU	9.5	$425	$4,037.50	7
01/14/2015	Document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0008	MXU	5.0	$425	$2,125.00	7
01/15/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
01/15/2015	Prepare for and attend Catalyst training with R. Speigel for class certification project.	JLA	1.2	$700	$840.00	10

Date	Description	Initials	Hours	Rate	Total	Task Code
01/15/2015	Document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0008	MXU	1.5	$425	$637.50	7
01/16/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$285	$171.00	11
01/16/2015	Finish document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0008; edit document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0004, 0008; begin document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0010	MXU	10.0	$425	$4,250.00	7
01/17/2015	Document review of Japanese searches -> Phase1 documents -> Panasonic TEL JP -> Pana_TEL_JP_0010	MXU	4.0	$425	$1,700.00	7
01/19/2015	Document review of Japanese searches -> Phase1 Docs -> Panasonic TEL JP -> Pana_TEL_JP_0010	MXU	5.3	$425	$2,252.50	7
01/20/2015	Review updated time reports (0.7); Draft emails regarding deficiencies in time summaries (0.8); Follow up with KG and co-counsel regarding time report status (0.5).	JLA	2.0	$700	$1,400.00	11
01/20/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.6); Email JLA regarding delinquent firms (0.1).	KG	0.7	$285	$199.50	11
01/20/2015	Conference call with document reviewers; finish document review of Japanese searches -> Phase1 Docs -> Panasonic TEL JP -> Pana_TEL_JP_0010; edit document review of Japanese searches -> Phase1 Docs -> Panasonic TEL JP -> Pana_TEL_JP_0010; begin document review of Japanese searches -> Phase1 Docs -> Pana Jt Review -> Pana_Jt_0001	MXU	10.5	$425	$4,462.50	7
01/21/2015	Review IPP timekeeping reports and update master tracking spreadsheet (1.0); Emails to IPP counsel regarding same (0.2).	KG	1.2	$285	$342.00	11
01/21/2015	Review and follow up regarding time and expense reports.	JLA	1.2	$700	$840.00	11
01/21/2015	Review problem time and expense reports and emails regarding same.	JLA	0.3	$700	$210.00	11
01/21/2015	Begin class certification research project per R. Speigel.	JLA	2.0	$700	$1,400.00	10
01/21/2015	Document review of Japanese searches -> Phase1 Docs -> Pana Jt Review -> Pana_Jt_0001	MXU	6.0	$425	$2,550.00	7
01/22/2015	Meeting with KG regarding other issues in time reports	JLA	0.2	$700	$140.00	11
01/22/2015	Review IPP timekeeping reports and update master tracking spreadsheet (1.0); Email JLA re same (0.1).	KG	1.1	$285	$313.50	11
01/22/2015	Review all deficient and outstanding time and email co-counsel regarding deficiencies.	JLA	1.5	$700	$1,050.00	11
01/22/2015	Japanese searches -> Phase1 Docs -> Pana Jt Review -> Pana_Jt_0001	MXU	6.0	$425	$2,550.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
01/23/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.5); Emails with IPP counsel regarding same (0.1).	KG	0.6	$285	$171.00	11
01/23/2015	Email co-lead counsel regarding time records and assignments.	JLA	0.2	$700	$140.00	11
01/23/2015	Read T2 materials from R. Speigel	JLA	0.2	$700	$140.00	10
01/23/2015	Japanese searches -> Phase1 Docs -> Pana Jt Review -> Pana_Jt_0001	MXU	4.5	$425	$1,912.50	7
01/24/2015	Review updated time report for lead counsel and email co-counsel regarding same.	JLA	0.3	$700	$210.00	11
01/25/2015	Work on class certification project per R. Speigel.	JLA	3.3	$700	$2,310.00	10
01/26/2015	Email co-counsel regarding time reporting protocol (0.2); Review time from Block & Leviton and email KG regarding same (0.2).	JLA	0.4	$700	$280.00	11
01/26/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.5); Emails with IPP counsel re same (0.2).	KG	0.7	$285	$199.50	11
01/26/2015	Telephone call with R. Speigel regarding class certification project.	JLA	0.4	$700	$280.00	10
01/26/2015	Document review of Japanese searches -> Phase 1 documents -> Pana Jt Review -> Pana_Jt_0001	MXU	4.0	$425	$1,700.00	7
01/27/2015	Review IPP timekeeping reports and update master tracking spreadsheet (1.1); Emails with IPP counsel re same (0.3).	KG	1.4	$285	$399.00	11
01/27/2015	Finish document review of Japanese searches -> Phase 1 documents -> Pana Jt Review -> Pana_Jt_0001	MXU	4.0	$425	$1,700.00	7
01/28/2015	Prepare list of delinquent detailed timekeeping reports (0.4); Review IPP timekeeping reports and update master tracking spreadsheet (0.6); Emails with IPP counsel re same (0.2).	KG	1.2	$285	$342.00	11
01/28/2015	Reviewing incoming emails regarding time and cost submissions (0.2); Check incoming materials and email where follow up needed (0.5).	JLA	0.7	$700	$490.00	11
01/28/2015	Telephone calls with L. Chan regarding time reports (.2); Review counsel's time, email regarding discrepancies (.8); follow up regarding reports with L. Chan and KG (.1); draft emails regarding discrepancies (.2).	JLA	1.3	$700	$910.00	11
01/28/2015	Draft emails to firms with outstanding time/cost details; follow up regarding same.	JLA	0.4	$700	$280.00	11
01/28/2015	Additional follow up regarding time and expense requirements.	JLA	0.2	$700	$140.00	11
01/28/2015	Hitachi research for class certification project.	JLA	0.3	$700	$210.00	10
01/29/2015	Telephone call with L. Chan regarding time reports and report to Court (.2); meeting with KG regarding same (.2); follow up emails regarding time submissions by firms and review summary of status (.4).	JLA	0.8	$700	$560.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
01/29/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.9); Emails with JLA and co-lead counsel regarding same (0.2).	KG	1.1	$285	$313.50	11
01/29/2015	Telephone call with JLA regarding IPP billing records (0.1); Follow-up emails regarding same (0.2).	KG	0.3	$285	$85.50	11
01/30/2015	Email with MXU regarding translation assignment	JLA	0.2	$700	$140.00	11
01/30/2015	Review emails regarding time submissions (0.2); Telephone calls with L. Chan and KG regarding outstanding issues and finalizing report for Court (0.2).	JLA	0.4	$700	$280.00	11
01/30/2015	Translate PANA_0000062 and 63.	MXU	7.5	$425	$3,187.50	7
02/02/2015	Review time submission reports from co-counsel per L. Chan (.2); Email J. Verducci regarding counsel's time reports (.1); meeting with KG regarding compiling data for co-lead counsel (.1).	JLA	0.4	$700	$280.00	11
02/02/2015	Follow up regarding time reports for co-leads	JLA	0.2	$700	$140.00	11
02/03/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/03/2015	Email regarding costs.	JLA	0.1	$700	$70.00	11
02/03/2015	Create working table of class certification documents.	JLA	1.9	$700	$1,330.00	10
02/03/2015	Review/research materials regarding [redacted] for class certification project.	JLA	0.4	$700	$280.00	10
02/03/2015	Hitachi class certification project - identify top evidence by category.	JLA	3.0	$700	$2,100.00	10
02/04/2015	Review and respond to correspondence regarding updating time and cost submissions	JLA	0.3	$700	$210.00	11
02/04/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/04/2015	Review cast of characters and allegations regarding Hitachi for class certification project.	JLA	0.4	$700	$280.00	10
02/04/2015	Class certification project - analysis of class certification evidence.	JLA	1.6	$700	$1,120.00	10
02/05/2015	Update memo regarding class certification project	JLA	0.5	$700	$350.00	10
02/05/2015	Research re class certification project (1.8); Email R. Speigel re project (0.2).	JLA	2.0	$700	$1,400.00	10
02/05/2015	Meeting with JLA regarding next project to review class action certification documents per lead counsel.	MXU	0.1	$425	$42.50	7
02/06/2015	Update chart regarding class certification	JLA	0.2	$700	$140.00	10
02/06/2015	Class certification project - T2 review of selected class certification documents (1.0); Research and review class certification sub-topics (1.7); Review cast of characters for new witnesses (.5).	JLA	3.2	$700	$2,240.00	10
02/06/2015	Class certification project - review class certification sub-topics and review with MXU (1.0); Create template for tracking hot class certification documents (0.5); Revise table accordingly (0.3).	JLA	1.8	$700	$1,260.00	10

Date	Description	Initials	Hours	Rate	Total	Task Code
02/09/2015	Class certification project - create searches in Catalyst; email MXU regarding template and sub-issues; draft and revise memo	JLA	0.9	$700	$630.00	10
02/10/2015	Follow up regarding counsel's time and past due entries	JLA	0.3	$700	$210.00	11
02/10/2015	Review sub-issues for class certification review project per lead counsel.	MXU	1.0	$425	$425.00	7
02/11/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
02/11/2015	Review incoming summaries from co-counsel	JLA	0.2	$700	$140.00	11
02/11/2015	Class certification project - respond to questions relating to certain evidence and update memo.	JLA	0.9	$700	$630.00	10
02/11/2015	T2 document review for class certification project per lead counsel.	MXU	8.0	$425	$3,400.00	7
02/12/2015	Class certification project - evaluate evidence; email MXU regarding his review regarding same.	JLA	1.2	$700	$840.00	10
02/12/2015	T2 document review for class certification project per lead counsel.	MXU	2.0	$425	$850.00	7
02/13/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
02/13/2015	Meeting with MXU regarding class certification project (.3); Draft evidentiary summaries for class certification (2.2).	JLA	2.5	$700	$1,750.00	10
02/13/2015	Revise class certification summaries for class certification project	JLA	0.8	$700	$560.00	10
02/13/2015	T2 document review for class certification project per lead counsel.	MXU	3.5	$425	$1,487.50	7
02/13/2015	Discuss class certification project review issues with JLA	MXU	0.5	$425	$212.50	7
02/16/2015	T2 document review for class certification project per lead counsel.	MXU	4.0	$425	$1,700.00	7
02/17/2015	Respond to MXU inquiry regarding class certification project.	JLA	0.2	$700	$140.00	10
02/17/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
02/18/2015	Analyze selected hot documents re class certification for memo.	JLA	1.0	$700	$700.00	10
02/18/2015	T2 document review for class certification project per lead counsel.	MXU	5.0	$425	$2,125.00	7
02/20/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Meeting with JLA re same (0.1).	KG	0.4	$285	$114.00	11
02/20/2015	Email regarding class certification review written reports; email R. Spiegel regarding same.	JLA	0.2	$700	$140.00	10
02/23/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
02/24/2015	T2 document review for class certification project per lead counsel.	MXU	5.0	$425	$2,125.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
02/25/2015	T2 document review for class certification project per lead counsel.	MXU	4.0	$425	$1,700.00	7
03/01/2015	Class certification project - draft memo and categorize evidence for memo.	JLA	3.8	$700	$2,660.00	10
03/02/2015	Class certification project - review selected hot documents and analyze (2.8); Update memo (1.0).	JLA	3.8	$700	$2,660.00	10
03/02/2015	T2 document review for class certification project per lead counsel.	MXU	4.0	$425	$1,700.00	7
03/03/2015	Review incoming time records; meeting with KG regarding monthly summaries	JLA	0.3	$700	$210.00	11
03/03/2015	Class certification project - analyze selected hot/relevant documents regarding class certification (4.8); Update memo (1.0).	JLA	5.8	$700	$4,060.00	10
03/03/2015	T2 document review for class certification project per lead counsel.	MXU	3.0	$425	$1,275.00	7
03/04/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Draft January summary for JLA (0.4).	KG	0.7	$285	$199.50	11
03/04/2015	Telephone call with MXU regarding class certification project (0.2); analyze select class certification evidence for memo (0.3).	JLA	0.5	$700	$350.00	10
03/04/2015	T2 document review for class certification project per lead counsel.	MXU	8.0	$425	$3,400.00	7
03/05/2015	Telephone call with R. Speigel regarding class certification assignment (.2); Review search categories; brainstorm regarding organizing evidence (1.2); Review existing class certification categories established for the project (.1).	JLA	1.5	$700	$1,050.00	10
03/09/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
03/09/2015	Draft/revise entries for class certification project and update master list	JLA	1.7	$700	$1,190.00	10
03/09/2015	Review new entries; create categories for class certification project; draft and revise entries	JLA	0.6	$700	$420.00	10
03/09/2015	T2 document review for class certification project per lead counsel.	MXU	3.0	$425	$1,275.00	7
03/10/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
03/11/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
03/12/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$285	$142.50	11
03/12/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
03/13/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
03/13/2015	Class certification project - review document summaries (0.2); Create memo per R. Speigel regarding same (0.3).	JLA	0.5	$700	$350.00	10
03/16/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Email IPP counsel regarding corrected timekeeping report.	KG	0.4	$285	$114.00	11
03/16/2015	T2 document review for class certification project per lead counsel.	MXU	3.0	$425	$1,275.00	7
03/17/2015	Edit/revise class certification issue chart	JLA	1.5	$700	$1,050.00	10
03/17/2015	Create table of class certification sub-issues	JLA	0.4	$700	$280.00	10
03/17/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
03/18/2015	Class certification project - evaluate potential subtopics (0.5); Edit and revise entries from MXU and follow up regarding same (2.2).	JLA	2.7	$700	$1,890.00	10
03/18/2015	T2 document review for class certification project per lead counsel.	MXU	6.0	$425	$2,550.00	7
03/19/2015	Consolidate multiple charts regarding class certification review.	KG	0.5	$285	$142.50	11
03/19/2015	Revise categories for class certification project per R. Speigel (0.2); Email MXU regarding new format/categories and email KG regarding combining all documents (0.1); Review master document/edit (0.2).	JLA	0.5	$700	$350.00	10
03/20/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Draft February summary for JLA (0.2).	KG	0.4	$285	$114.00	11
03/22/2015	Draft/revise entries on class certification chart	JLA	1.6	$700	$1,120.00	10
03/23/2015	Draft/revise class certification evidence entries and identify areas for follow up (2.5); Email R. Speigel (0.2).	JLA	2.7	$700	$1,890.00	10
03/24/2015	Read time summary report; email KG regarding same	JLA	0.2	$700	$140.00	11
03/24/2015	Telephone calls with R. Speigel and MXU regarding class certification project and email R. Speigel with update.	JLA	0.3	$700	$210.00	10
03/27/2015	Email to IPP counsel regarding time submissions	JLA	0.2	$700	$140.00	11
03/27/2015	T2 document review for class certification project per lead counsel.	MXU	8.0	$425	$3,400.00	7
03/28/2015	T2 document review for class certification project per lead counsel.	MXU	5.0	$425	$2,125.00	7
04/09/2015	Respond to IPP counsel questions regarding timekeeping; review incoming email regarding time submissions	JLA	0.2	$700	$140.00	11
04/13/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.6); Draft list of delinquent firms with contact information for JLA (0.5).	KG	1.1	$285	$313.50	11
04/14/2015	Review KG report regarding delinquent time reports (0.2); Review incoming email regarding time submissions and draft emails to co-counsel and B. Glackin regarding same (0.4).	JLA	0.6	$700	$420.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
04/14/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.0	$285	$285.00	11
04/15/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
04/15/2015	Email IPP counsel regarding time submissions to the court.	JLA	0.2	$700	$140.00	11
04/17/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
04/17/2015	Email IPP counsel regarding time (0.1); Review status of submissions (0.1).	JLA	0.2	$700	$140.00	11
04/20/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Draft quarterly IPP timekeeping report and email JLA regarding same (0.4).	KG	0.6	$285	$171.00	11
04/26/2015	Email D. Lambrinos regarding discovery responses	JLA	0.1	$700	$70.00	3
04/27/2015	Email co-counsel regarding discovery for class reps	JLA	0.2	$700	$140.00	3
04/28/2015	Review discovery materials from D. Lambrinos (0.7); Email with co-counsel regarding responses and meeting (0.3).	JLA	1.0	$700	$700.00	3
04/28/2015	Follow up with KG regarding time reports for the court	JLA	0.2	$700	$140.00	11
04/28/2015	Update quarterly IPP timekeeping report for Court (0.4); Email lead counsel regarding same (0.2).	KG	0.6	$285	$171.00	11
04/29/2015	Telephone call with J. Emerson regarding [redacted]; update D. Lambrinos regarding same (x2)	JLA	0.8	$700	$560.00	3
04/29/2015	Telephone call with co-lead counsel regarding quarterly IPP timekeeping report (0.1); Revise and email same (0.1).	KG	0.2	$285	$57.00	11
04/30/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.1); Circulate revised quarterly IPP timekeeping summary to co-lead counsel and JLA (0.1).	KG	0.2	$285	$57.00	11
05/01/2015	Email J. Emerson [redacted] with instructions from co-leads	JLA	0.1	$700	$70.00	3
05/04/2015	Follow up regarding class representative discovery	JLA	0.1	$700	$70.00	3
05/05/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$285	$85.50	11
05/06/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/07/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Review IPP firm's amended reports and emails regarding same (0.3).	KG	0.5	$285	$142.50	11
05/08/2015	Emails to IPP counsel regarding monthly time submissions.	JLA	0.3	$700	$210.00	11
05/08/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
05/11/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
05/12/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
05/13/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/14/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
05/18/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Draft list of delinquent IPP firms for JLA (0.1).	KG	0.3	$285	$85.50	11
05/20/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
05/22/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$285	$57.00	11
06/02/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
06/03/2015	Review incoming time reports for issues	JLA	0.4	$700	$280.00	11
06/04/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
06/04/2015	Email correspondence with MXU and co-lead counsel regarding document review (0.1); Review incoming time reports (0.3).	JLA	0.4	$700	$280.00	11
06/09/2015	Review incoming time submissions	JLA	0.2	$700	$140.00	11
06/10/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.1	$285	$313.50	11
06/18/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
06/22/2015	Email regarding corrected time submission; telephone call with B. Glackin	JLA	0.2	$700	$140.00	11
06/22/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$285	$28.50	11
07/06/2015	Email R. Spiegel regarding document review status.	JLA	0.1	$700	$70.00	11
07/07/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	2.5	$425	$1,062.50	7
07/08/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
07/08/2015	Review incoming time submissions for compliance.	JLA	0.3	$700	$210.00	11
07/08/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	1.0	$425	$425.00	7
07/09/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	3.0	$425	$1,275.00	7
07/10/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	7.0	$425	$2,975.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
07/11/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	6.0	$425	$2,550.00	7
07/13/2015	Emails to B. Glackin regarding [redacted]	JLA	0.3	$700	$210.00	11
07/13/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016.	MK	8.0	$425	$3,400.00	7
07/14/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$285	$114.00	11
07/14/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072564—TSB-LIB-00074512.	MK	8.0	$425	$3,400.00	7
07/15/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072563—TSB-LIB-00074664.	MK	8.0	$425	$3,400.00	7
07/16/2015	Email with A. Sheanin and defense counsel regarding document production	JLA	0.1	$700	$70.00	6
07/16/2015	Email B. Glackin regarding time submission issues	JLA	0.2	$700	$140.00	11
07/16/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072564—TSB-LIB-00074645.	MK	7.5	$425	$3,187.50	7
07/17/2015	Emails with B. Glackin regarding noncompensable time and telephone call with B. Glackin regarding same.	JLA	0.3	$700	$210.00	11
07/17/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072097—TSB-LIB-00074974.	MK	7.3	$425	$3,102.50	7
07/18/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072753—TSB-LIB-00072780.	MK	1.3	$425	$552.50	7
07/20/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072783—TSB-LIB-00074845.	MK	8.0	$425	$3,400.00	7
07/21/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072783—TSB-LIB-00073279.	MK	7.5	$425	$3,187.50	7
07/22/2015	Draft emails to IPP counsel regarding upcoming time reports and email co-lead counsel regarding same.	JLA	0.5	$700	$350.00	11
07/22/2015	Update regarding document review.	JLA	0.2	$700	$140.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
07/22/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072186—TSB-LIB-00074676.	MK	8.5	$425	$3,612.50	7
07/23/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072288—TSB-LIB-00074500.	MK	8.0	$425	$3,400.00	7
07/24/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072554—TSB-LIB-00074502.	MK	7.0	$425	$2,975.00	7
07/25/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072691—TSB-LIB-00075116.	MK	1.0	$425	$425.00	7
07/27/2015	Emails to co-leads and IPP counsel regarding upcoming time submission, missing time, and standards.	JLA	0.5	$700	$350.00	11
07/27/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Email JLA re same (0.1).	KG	0.3	$285	$85.50	11
07/27/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072186—TSB-LIB-00075116.	MK	8.0	$425	$3,400.00	7
07/28/2015	Follow up regarding IPP time submissions and report regarding time and review submissions.	JLA	0.4	$700	$280.00	11
07/28/2015	Review IPP timekeeping reports and update master tracking spreadsheet (1.8); Email JLA with updated draft quarterly IPP timekeeping report (0.2); Follow up with delinquent firms (0.7).	KG	2.7	$285	$769.50	11
07/28/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072097—TSB-LIB-00075263.	MK	8.0	$425	$3,400.00	7
07/29/2015	Update draft quarterly IPP timekeeping report for Court and email JLA regarding same.	KG	0.8	$285	$228.00	11
07/29/2015	Follow up regarding IPP time submissions and report for the court.	JLA	0.3	$700	$210.00	11
07/29/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072132—TSB-LIB-00073811.	MK	5.3	$425	$2,252.50	7
07/30/2015	Review IPP reports regarding excessive read & review billing and email JLA regarding same (0.6); Update quarterly IPP timekeeping report and circulate same to co-lead counsel and JLA (0.2).	KG	0.8	$285	$228.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
07/30/2015	Review time report for the court and email B. Glackin regarding outstanding and unauthorized time (0.3); Review revised time report (0.1).	JLA	0.4	$700	$280.00	11
07/30/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072376—TSB-LIB-00074847.	MK	8.0	$425	$3,400.00	7
07/31/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016 bates range TSB-LIB-00072098—TSB-LIB-00074498.	MK	7.3	$425	$3,102.50	7
08/01/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072123—TSB-LIB-00075137.	MK	3.5	$425	$1,487.50	7
08/03/2015	Email co-counsel regarding quarterly time report for court.	JLA	0.2	$750	$150.00	11
08/03/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.4); Update master tracking spreadsheet for new quarter (0.4).	KG	0.8	$295	$236.00	11
08/03/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072187—TSB-LIB-00074974.	MK	8.0	$425	$3,400.00	7
08/04/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, bates range TSB-LIB-00072185—TSB-LIB-00074502.	MK	7.0	$425	$2,975.00	7
08/05/2015	Review incoming time and email attorneys regarding non-compensable time submitted.	JLA	0.4	$700	$280.00	11
08/05/2015	Japanese language document review of custodial documents for Hiroshi Kubo in batch TSB/H_Kubo_0016, TSB-LIB-00072097—TSB-LIB-00074976.	MK	9.0	$425	$3,825.00	7
08/06/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates ranges NEC00257052—NEC00261780 and TSB-LIB-00072119—TSB-LIB-00075134.	MK	7.8	$425	$3,315.00	7
08/07/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00260402—NEC00261789.	MK	6.5	$425	$2,762.50	7

Date	Description	Initials	Hours	Rate	Total	Task Code
08/08/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00261790—NEC00261798.	MK	1.8	$425	$765.00	7
08/10/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00257012—NEC00261865.	MK	8.5	$425	$3,612.50	7
08/11/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259474—NEC00261879.	MK	9.0	$425	$3,825.00	7
08/12/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256839—NEC00259581.	MK	7.5	$425	$3,187.50	7
08/13/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256431—NEC00260570.	MK	8.5	$425	$3,612.50	7
08/14/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259687—NEC00260690.	MK	6.5	$425	$2,762.50	7
08/17/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	1.8	$295	$531.00	11
08/17/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00258793—NEC00260945.	MK	8.3	$425	$3,527.50	7
08/18/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, NEC00256539—NEC00260070.	MK	8.0	$425	$3,400.00	7
08/19/2015	Review incoming time reports and email IPP counsel regarding issues and deficiencies.	JLA	0.5	$700	$350.00	11
08/19/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00257573—NEC00261704.	MK	8.0	$425	$3,400.00	7
08/20/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259359—NEC00261745.	MK	7.5	$425	$3,187.50	7

Date	Description	Initials	Hours	Rate	Total	Task Code
08/21/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256739—NEC00259473.	MK	8.3	$425	$3,527.50	7
08/24/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259584—NEC00260550.	MK	8.3	$425	$3,527.50	7
08/25/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256939—NEC00259683.	MK	8.3	$425	$3,527.50	7
08/26/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256439—NEC00260766.	MK	6.0	$425	$2,550.00	7
08/27/2015	Telephone call with B. Glackin regarding case status.	JLA	0.1	$700	$70.00	11
08/27/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259790—NEC00261073.	MK	9.0	$425	$3,825.00	7
08/28/2015	Audit time reports and email co-counsel regarding problems identified in reporting (1.1); Emails to J. Zahid regarding status conference (0.3); Email B. Glackin regarding timekeeping discussion (0.3); Telephone call with B. Glackin re same (0.2).	JLA	1.9	$700	$1,330.00	11
08/28/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259132—NEC00261576.	MK	8.5	$425	$3,612.50	7
08/30/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00259132—NEC00261576.	MK	8.0	$425	$3,400.00	7
08/31/2015	Email regarding inadvertent disclosures and clawback.	JLA	0.1	$700	$70.00	11
09/01/2015	Review correspondence regarding inadvertent disclosures (0.1); Review files regarding same and email JLA (0.5).	KG	0.6	$295	$177.00	11
09/01/2015	Email regarding revised CM time (0.1); Email co-lead counsel regarding updated time (0.1); Email regarding clawed back documents (0.1).	JLA	0.3	$700	$210.00	11
09/01/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256429—NEC00260674.	MK	8.8	$425	$3,740.00	7

Date	Description	Initials	Hours	Rate	Total	Task Code
09/02/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256537—NEC00260948.	MK	8.0	$425	$3,400.00	7
09/03/2015	Confer with JLA regarding timekeeping records and court submissions and review file regarding same.	KG	0.3	$295	$88.50	11
09/03/2015	Telephone calls with J. Verducci and with LCHB regarding time submissions (0.2); Meeting with KG and follow up with J. Verducci regarding historical submissions (0.2).	JLA	0.4	$700	$280.00	11
09/03/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256737—NEC00261742.	MK	7.8	$425	$3,315.00	7
09/04/2015	Japanese language document review of custodial documents for Kazunari Takeshima in batch NEC/K_Takeshima_0003, bates range NEC00256437—NEC00261571.	MK	7.5	$425	$3,187.50	7
09/15/2015	Email regarding document review status	JLA	0.1	$700	$70.00	11
09/22/2015	Email to J. Zahid regarding liaison counsel tasks and hearing.	JLA	0.2	$700	$140.00	11
09/22/2015	Email with B. Glackin regarding time submissions (0.1); Follow up with KG regarding outstanding time reports (0.2); Draft communication to IPP co-counsel re time issues (0.5).	JLA	0.8	$700	$560.00	11
09/22/2015	Email follow up with B. Glackin regarding CMC and time reports (0.2); Follow up with IPP co-counsel regarding compliance (0.2).	JLA	0.4	$700	$280.00	11
09/23/2015	Emails to IPPs regarding time and updated reports	JLA	0.3	$700	$210.00	11
09/24/2015	Draft summary timekeeping report for JLA.	KG	0.1	$295	$29.50	11
09/24/2015	Follow up regarding IPP reports.	JLA	0.2	$700	$140.00	11
10/01/2015	Meeting with KG regarding categories of lodestar and additional analysis of time submitted by counsel.	JLA	0.3	$700	$210.00	11
10/01/2015	Email with IPP counsel regarding time submissions (0.1); Meeting with KG regarding updated reporting protocol (0.1); Draft email re protocol and compliance (0.2).	JLA	0.4	$700	$280.00	11
10/01/2015	Email regarding defendant's inadvertent disclosures and clawback.	JLA	0.1	$700	$70.00	11
10/01/2015	Prepare for hearing: prepare and review time summaries for hearing (0.4); Telephone call with S. Williams regarding hearing (0.2).	JLA	0.6	$700	$420.00	14
10/02/2015	Meeting with co-leads regarding hearing (0.7); Meeting with Judge Gonzalez-Rogers after CMC (0.5).	JLA	1.2	$700	$840.00	14

Date	Description	Initials	Hours	Rate	Total	Task Code
10/13/2015	Email IPP counsel regarding missing time detail (0.1); Email [redacted] regarding policy on non-compensable time (0.2); Re-send letter from co-leads to certain IPP firms (0.1).	JLA	0.4	$700	$280.00	11
10/21/2015	Review IPP timekeeping reports and update master tracking spreadsheet (0.9); Email JLA re same (0.2).	KG	1.1	$295	$324.50	11
10/21/2015	Email KG regarding upcoming report to the Court and communication with IPP counsel and email co-leads regarding quarterly reports.	JLA	0.3	$700	$210.00	11
10/22/2015	Email with IPP counsel regarding time submissions and follow up with B. Glackin and KG regarding same.	JLA	0.3	$700	$210.00	11
10/22/2015	Communicate with co-leads and KG regarding time summaries and email IPP counsel regarding protocol and time reports.	JLA	0.3	$700	$210.00	11
10/23/2015	Compile and review list of delinquent firms; review draft quarterly report for content and email with co-lead counsel regarding same.	JLA	0.4	$700	$280.00	11
10/26/2015	Email KG regarding flags on non-compensable time and review entries regarding same.	JLA	0.3	$700	$210.00	11
10/26/2015	Multiple emails to IPP counsel regarding excluding non-compensable time and review disputed time.	JLA	0.6	$700	$420.00	11
10/26/2015	Update quarterly IPP timekeeping report and circulate same to co-lead counsel and JLA.	KG	0.6	$295	$177.00	11
10/27/2015	Email regarding discovery.	JLA	0.2	$700	$140.00	6
10/28/2015	Email [redacted] regarding non-compensable time submitted (0.1) Review disputed time and send follow-up email regarding same (0.3).	JLA	0.4	$700	$280.00	11
10/28/2015	Additional email exchange with [redacted] regarding non-compensable time policy.	JLA	0.2	$700	$140.00	11
10/29/2015	Review KG email and email from counsel regarding disputed time (0.1); Draft email response and explanation of rejected time to [redacted] (0.3).	JLA	0.4	$700	$280.00	11
11/04/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
11/09/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.9	$295	$265.50	11
11/12/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$295	$88.50	11
12/01/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$295	$59.00	11
12/03/2015	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
12/03/2015	Remove inadvertently produced files from production flash drives per A. Wong letter.	KG	0.4	$295	$118.00	11
12/03/2015	Review A. Wong letter regarding inadvertently produced documents (0.1); Review electronic and hard copy files and email JLA regarding same (0.3).	KG	0.4	$295	$118.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
12/07/2015	Email regarding incoming time reports and meeting with KG re communication with IPP counsel pertaining to upcoming report to the court.	JLA	0.3	$700	$210.00	11
12/07/2015	Delete inadvertently produced documents per A. Wong letter.	KG	1.4	$295	$413.00	11
12/07/2015	Review emails and correspondence to verify clawed back documents are deleted and email KG regarding same.	JLA	0.2	$700	$140.00	11
12/11/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$295	$118.00	11
12/14/2015	Emails from IPP counsel regarding time for November.	JLA	0.2	$700	$140.00	11
12/16/2015	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$295	$118.00	11
01/13/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$295	$147.50	11
01/14/2016	Review incoming time and draft email regarding time report for the Court.	JLA	0.3	$700	$210.00	11
01/18/2016	Email regarding quarterly reports.	JLA	0.2	$700	$140.00	11
01/19/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$295	$177.00	11
01/20/2016	Follow up regarding reports.	JLA	0.1	$700	$70.00	11
01/21/2016	Email co-lead counsel regarding time submission (0.1); Email IPP counsel regarding quarterly report (0.2); Follow up with KG regarding status of quarterly report (0.1).	JLA	0.4	$700	$280.00	11
01/22/2016	Review incoming time submissions.	JLA	0.3	$700	$210.00	11
01/26/2016	Email with L. Chan regarding [redacted] time and review detailed time entries submitted report to L. Chan.	JLA	0.2	$700	$140.00	11
01/26/2016	Review summary reports (0.1); Respond to inquiry from L. Chan and email to co-lead counsel (0.1); Follow up regarding request for detailed time from L. Chan (0.1)	JLA	0.3	$700	$210.00	11
01/26/2016	Pull time for L. Chan and follow up with KG to confirm same.	JLA	0.2	$700	$140.00	11
01/26/2016	Review IPP timekeeping reports and update master tracking spreadsheet (1.0); Update quarterly IPP timekeeping report and circulate same to co-lead counsel and JLA (0.6).	KG	1.6	$295	$472.00	11
02/02/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$295	$147.50	11
02/03/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
02/03/2016	Respond to incoming email regarding time submission.	JLA	0.2	$700	$140.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
02/04/2016	Email with court and J. Zahid regarding liaison DAPs and tag-along cases (0.1); Email KG regarding tag-along status (0.1).	JLA	0.3	$700	$210.00	11
02/08/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$295	$59.00	11
02/09/2016	Email with liaison counsel and co-leads regarding CMC and follow up regarding Court's request re unredacted files.	JLA	0.3	$700	$210.00	8
02/09/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$295	$59.00	11
02/10/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
02/11/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$295	$88.50	11
02/12/2016	Meeting with co-counsel at CMC.	JLA	0.3	$700	$210.00	14
02/22/2016	Email J. Friedman and KG regarding quarterly time submission.	JLA	0.1	$700	$70.00	11
02/22/2016	Email with L. Chan regarding Sawai deposition.	JLA	0.2	$700	$140.00	4
02/23/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$295	$118.00	11
02/23/2016	Prepare for telephone call with L. Chan regarding Hitachi depositions; telephone call with L. Chan regarding Hitachi depositions.	JLA	0.5	$700	$350.00	4
02/23/2016	Deposition preparation regarding M. Sawai.	JLA	1.0	$700	$700.00	4
02/23/2016	Emails with L. Chan and S. Kim-Helms regarding deposition preparation for M. Sawai; review materials regarding witness.	JLA	0.4	$700	$280.00	4
02/24/2016	Email KG regarding gathering potential exhibits.	JLA	0.2	$700	$140.00	4
02/24/2016	Prepare documents for JLA review in advance of Michinori Sawai deposition and telephone call with JLA regarding same.	KG	0.5	$295	$147.50	4
02/24/2016	Telephone call with DPPs regarding Sawai deposition; follow up telephone call with L. Chan.	JLA	0.5	$700	$350.00	4
02/25/2016	Prepare potential deposition exhibits for JLA review.	TV	0.4	$170	$68.00	
02/29/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
03/02/2016	Emails with L. Chan and C. Zirpoli regarding newly produced documents and Sawai deposition.	JLA	0.2	$700	$140.00	4
03/02/2016	Deposition preparation - review potential exhibits for Sawai deposition.	JLA	1.9	$700	$1,330.00	4
03/03/2016	Respond to inquiry from Susman Godfrey regarding time submissions (0.2); Spot check incoming time (0.2).	JLA	0.4	$700	$280.00	11
03/03/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$295	$118.00	11
03/03/2016	Assemble IPP detailed reports per co-lead counsel's request.	KG	0.2	$295	$59.00	11
03/03/2016	Email regarding deposition schedule - Sawai.	JLA	0.1	$700	$70.00	4

Date	Description	Initials	Hours	Rate	Total	Task Code
03/03/2016	Prepare additional deposition preparation materials for JLA.	KG	0.3	$295	$88.50	4
03/08/2016	Emails regarding Sawai privilege log; review additional certified translations for deposition preparation.	JLA	0.6	$700	$420.00	4
03/09/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.3); Prepare draft quarterly IPP timekeeping report showing current lodestar per L. Chan request (0.4).	KG	0.7	$295	$206.50	11
03/10/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$295	$88.50	11
03/11/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$295	$59.00	11
03/11/2016	Email regarding certified translations for Sawai deposition.	JLA	0.1	$700	$70.00	4
03/14/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
03/14/2016	Sawai background research and depo prep.	JLA	0.5	$700	$350.00	4
03/16/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$295	$59.00	11
03/17/2016	Respond to multiple emails regarding reimbursement of IPP expenses.	JLA	0.3	$700	$210.00	11
03/17/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
03/17/2016	Sawai deposition preparation - review and annotate potential deposition exhibits.	JLA	1.0	$700	$700.00	4
03/18/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$295	$29.50	11
03/22/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$295	$177.00	11
03/25/2016	Email DPPs regarding deposition preparation; prepare for Sawai deposition.	JLA	1.2	$700	$840.00	4
03/25/2016	Telephone call with L. Chan regarding deposition protocol and Sawai deposition.	JLA	0.2	$700	$140.00	4
03/28/2016	Deposition preparation for M. Sawai.	JLA	2.5	$700	$1,750.00	4
03/30/2016	Telephone call with L. Chan regarding Sawai deposition preparation; review potential exhibits.	JLA	1.1	$700	$770.00	4
03/31/2016	Deposition preparation for Sawai.	JLA	0.6	$700	$420.00	4
04/01/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
04/01/2016	Meeting with C. Zirpoli and C. Hammarskjold regarding Sawai deposition preparation; telephone call with DAP counsel regarding deposition; prepare for Sawai deposition.	JLA	3.2	$725	$2,320.00	4
04/05/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	3.8	$305	$1,159.00	11
04/05/2016	Prepare for Sawai deposition; emails regarding same.	JLA	2.6	$725	$1,885.00	4
04/05/2016	Prepare for Sawai deposition.	JLA	3.1	$725	$2,247.50	4

Date	Description	Initials	Hours	Rate	Total	Task Code
04/06/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
04/06/2016	Deposition of M. Sawai.	JLA	9.7	$725	$7,032.50	4
04/07/2016	Deposition of M. Sawai.	JLA	8.8	$725	$6,380.00	4
04/08/2016	Deposition of M. Sawai.	JLA	5.4	$725	$3,915.00	4
04/11/2016	Email regarding exhibits and transcripts from Sawai deposition.	JLA	0.2	$725	$145.00	4
04/12/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Email JLA re same (0.1).	KG	0.3	$305	$91.50	11
04/12/2016	Draft summary of highlights from Sawai deposition; email summary and transcripts to co-leads.	JLA	0.8	$725	$580.00	4
04/12/2016	Address time entry concerns, email IPP counsel re timekeeping policy, and review audited entries from KG.	JLA	0.4	$725	$290.00	11
04/13/2016	Email with co-leads regarding deposition follow up for Sawai.	JLA	0.1	$725	$72.50	4
04/14/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
04/20/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
04/25/2016	Review IPP timekeeping reports and update master tracking spreadsheet (1.1); Email JLA regarding delinquent firms (0.2).	KG	1.3	$305	$396.50	11
04/25/2016	Email J.Verducci regarding time submission; follow up with IPP counsel regarding missing time.	JLA	0.2	$725	$145.00	11
04/26/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.6); Email co-lead counsel regarding same (0.1).	KG	0.7	$305	$213.50	11
04/26/2016	Respond to emails regarding time reports.	JLA	0.2	$725	$145.00	11
04/27/2016	Email with KG regarding preparing time reports for court and necessary follow up .	JLA	0.2	$725	$145.00	11
04/28/2016	Email IPP firms regarding delinquent reports and email co-lead counsel regarding same.	KG	0.3	$305	$91.50	11
05/02/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
05/04/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
05/07/2016	Email L. Chan re detailed time reports from IPP counsel.	JLA	0.2	$725	$145.00	11
05/09/2016	Respond to inquiries from L. Chan regarding certain firms' time submissions.	JLA	0.2	$725	$145.00	11
05/10/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
05/18/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11
05/19/2016	Retrieve Shimizu exhibits and transcript from court reporter's website.	KG	0.1	$305	$30.50	11
05/19/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
05/27/2016	Prepare summary of IPP timekeeping reports per L. Chan request and emails re same.	KG	0.3	$305	$91.50	11
06/02/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
06/03/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
06/10/2016	Email re time reports and transcripts.	JLA	0.3	$725	$217.50	11
06/13/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
06/14/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
06/20/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
06/23/2016	Respond to co-lead counsel's request for IPP lodestar information.	KG	0.1	$305	$30.50	11
06/23/2016	Follow up with L. Chan re time records; email KG re same.	JLA	0.2	$725	$145.00	11
07/05/2016	Update email re transcripts; review IPP time reports.	JLA	0.3	$725	$217.50	11
07/11/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.7); Compile list of delinquent firms to JLA for follow-up email in advance of quarterly IPP timekeeping report for Court (0.2).	KG	0.9	$305	$274.50	11
07/12/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
07/19/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
07/20/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
07/25/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.4); Email L. Chan re same (0.1).	KG	0.5	$305	$152.50	11
07/25/2016	Draft email to IPP counsel re time submissions and email co-lead counsel re time report.	JLA	0.3	$725	$217.50	11
07/26/2016	Review IPP timekeeping reports and update master tracking spreadsheet (1.0); Revise and circulate quarterly IPP timekeeping report (0.6).	KG	1.6	$305	$488.00	11
07/26/2016	Emails re quarterly time report; review time submissions for compliance	JLA	0.4	$725	$290.00	11
08/11/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.6	$305	$183.00	11
08/11/2016	Draft responsive email to J. Grossman explaining time submission policies; follow up with L. Chan re case status	JLA	0.3	$725	$217.50	11
08/15/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
08/17/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
08/18/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11
08/18/2016	Email counsel re timekeeping protocol; review time submitted	JLA	0.3	$725	$217.50	11
08/19/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
08/22/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
08/23/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
08/29/2016	Telephone call with JLA re [redacted] and assemble IPP timekeeping information for JLA review.	KG	0.8	$305	$244.00	11
08/29/2016	Call with D. Lambrinos [redacted]; call with KG re information to gather for lead counsel	JLA	0.4	$725	$290.00	8
08/29/2016	Draft email per D. Lambrinos; review and update counsel list; draft email to co-leads; review and revise draft declaration; email D. Lambrinos re same	JLA	0.6	$725	$435.00	8
09/01/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
09/07/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
09/08/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
09/09/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
09/13/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
09/14/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
09/15/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
09/21/2016	Email L. Chan re time report	JLA	0.1	$725	$72.50	11
09/26/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
09/26/2016	Follow up re time reports for LCHB	JLA	0.2	$725	$145.00	11
09/27/2016	Compile and send lodestar figures to date to co-lead counsel, per request.	KG	0.3	$305	$91.50	11
10/04/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
10/05/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
10/06/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
10/06/2016	Email IPP counsel re non-compensable time.	JLA	0.2	$725	$145.00	11
10/07/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
10/11/2016	Email L. Chan re reports	JLA	0.1	$725	$72.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
10/14/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11
10/14/2016	Email co-leads re time submission and draft email to IPP counsel re updated time for court submission.	JLA	0.2	$725	$145.00	11
10/18/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
10/18/2016	Revise master tracking spreadsheet and draft quarterly IPP timekeeping report.	KG	0.7	$305	$213.50	11
10/18/2016	Email co-leads re time reports.	JLA	0.2	$725	$145.00	11
10/19/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Email JLA re late reported time (0.1).	KG	0.3	$305	$91.50	11
10/19/2016	Email co-counsel re protocol for time submissions (0.1); Audit late time (0.1); Draft email re revised time report for court (0.1).	JLA	0.3	$725	$217.50	11
10/20/2016	Draft correspondence to IPP counsel re time audit/submissions, email co-leads re same, and review revised report for court (0.5); Follow up re court's requests re sealed documents (0.3).	JLA	0.8	$725	$580.00	11
10/24/2016	Email co-leads re coordinating with DPP and defense counsel for court filings re sealing and email with J. Zahid re same.	JLA	0.3	$725	$217.50	8
10/24/2016	Email co-leads re call with defendants and DPPs.	JLA	0.2	$725	$145.00	11
10/25/2016	Prepare for call re organizing and submitting sealed class certification papers per Court's request.	JLA	0.2	$725	$145.00	10
10/25/2016	Call re organizing sealed class certification papers per Court's request.	JLA	0.7	$725	$507.50	10
10/25/2016	Email S. Scarlett and J. Zahid re court's inquiry and next steps.	JLA	0.1	$725	$72.50	10
10/27/2016	Call re corrected sealing motions and follow-up email.	JLA	0.4	$725	$290.00	8
11/01/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
11/01/2016	Email Court in response to hearing inquiry.	JLA	0.1	$725	$72.50	14
11/01/2016	Emails to co-leads and defense counsel re appearances at hearing and follow up with Court re same.	JLA	0.2	$725	$145.00	11
11/02/2016	Per Court's request, follow up with co-lead counsel, DPPs, and defendants and prepare notice for hearing.	JLA	0.4	$725	$290.00	11
11/14/2016	Email Court re attendance of co-leads at hearing.	JLA	0.1	$725	$72.50	11
11/14/2016	Emails re time records from IPP to co-lead counsel.	JLA	0.2	$725	$145.00	11
11/15/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
11/17/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
11/17/2016	Email KG re time audits and follow up with IPP counsel re revised reports needed.	JLA	0.5	$725	$362.50	11
11/29/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11

Date	Description	Initials	Hours	Rate	Total	Task Code
12/01/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
12/05/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
12/07/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
12/08/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
12/08/2016	Respond to A. Sheanin email requesting research on [redacted] for his deposition; (0.1); Review and collect relevant research for deposition (0.4).	JLA	0.5	$725	$362.50	4
12/09/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.1); Email JLA re questionable time (0.1).	KG	0.2	$305	$61.00	11
12/09/2016	Email IPP counsel re problem with time reports.	JLA	0.2	$725	$145.00	11
12/12/2016	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Email JLA re late-submitted time (0.1).	KG	0.3	$305	$91.50	11
12/12/2016	Email multiple IPP counsel re problems with time submissions that must be corrected.	JLA	0.3	$725	$217.50	11
12/13/2016	Email from KG re late time submissions and follow up re same.	JLA	0.2	$725	$145.00	11
12/14/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11
12/15/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
12/16/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
12/21/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
12/22/2016	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
12/29/2016	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/03/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/04/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/05/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/05/2017	Respond to court inquiry re stipulation.	JLA	0.2	$725	$145.00	8
01/09/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/10/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
01/11/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
01/17/2017	Email multiple IPP firms re time report issues.	JLA	0.3	$725	$217.50	11
01/18/2017	Review IPP timekeeping reports and update master tracking spreadsheet (0.6); Email JLA re delinquent firms (0.2).	KG	0.8	$305	$244.00	11
01/20/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
01/23/2017	Review IPP timekeeping reports and update master tracking spreadsheet (0.8); Revise quarterly IPP timekeeping report and email to JLA for review (0.4).	KG	1.2	$305	$366.00	11
01/23/2017	Draft email to IPP counsel re time submissions and email IPP counsel re problems/questions with time.	JLA	0.5	$725	$362.50	11
01/24/2017	Review correspondence regarding IPP timekeeping reports from [redacted] and email JLA re same.	KG	0.3	$305	$91.50	11
01/24/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.4	$305	$122.00	11
01/24/2017	Email re quarterly time report and communicate with co-leads re same (0.2); Review historical time from firms for compliance (1.0); Draft correspondence to IPP counsel re compliance and follow up with co-lead counsel re same (0.4); Review and approve quarterly report for co-lead counsel (0.2).	JLA	1.8	$725	$1,305.00	11
01/25/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
01/27/2017	Review master tracking spreadsheet and draft quarterly IPP timekeeping report (0.2); Confer with JLA re same (0.1).	KG	0.3	$305	$91.50	11
01/27/2017	Email KG re late time from IPP firms (0.1); Email co-lead counsel re timekeeping issues and updated quarterly report (0.1); Email IPP firm re timekeeping compliance and review time submissions for compliance (0.3).	JLA	0.5	$725	$362.50	11
01/30/2017	Email S. Scarlett and B. Glackin re time submission issues by law firms and auditing of time.	JLA	0.2	$725	$145.00	11
01/31/2017	Review IPP timekeeping reports and update master tracking spreadsheet (0.1); Update tracking spreadsheet for new quarter (0.2).	KG	0.3	$305	$91.50	11
02/02/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
02/08/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
02/09/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.3	$305	$91.50	11
02/15/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.2	$305	$61.00	11
02/16/2017	Review IPP timekeeping reports and update master tracking spreadsheet.	KG	0.5	$305	$152.50	11

Date	Description	Initials	Hours	Rate	Total	Task Code
02/17/2017	Review IPP timekeeping reports and update master tracking spreadsheet (0.2); Review multiple revised/updated reports and email IPP counsel and JLA re same (0.3).	KG	0.5	$305	$152.50	11
02/21/2017	Telephone call with [redacted] re discrepancies in timekeeping report.	KG	0.2	$305	$61.00	11
02/23/2017	Review IPP timekeeping report and update master tracking spreadsheet.	KG	0.1	$305	$30.50	11
	Andrus Anderson LLP total lodestar at historic and capped rates		1,786.6		$804,037.00	

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
ANDRUS ANDERSON LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	$ 50,000.00
Court Fees (Filing, etc.)	$ 350.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	$ 279.27
Messenger/Delivery	$ 233.72
Photocopies – In House (capped at $0.20 per copy)	$ 1,163.00
Photocopies – Outside	
Postage	$ 0.48
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	$ 15.00
Miscellaneous	
TOTAL:	$ 52,041.47

EXHIBIT 5

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ERIC J. PICKAR IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BANGS MCCULLEN LAW FIRM**

I, Eric J. Pickar, declare:

1. I am a Partner of Bangs McCullen Law Firm, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Christopher Bessettee and as counsel for IPPs throughout the course of this litigation. The background and experience of Bangs McCullen Law Firm and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Bangs McCullen Law Firm performed the following work: representing the South Dakota Class Representative in all aspects of this litigation, including but not limited to the preparation of discovery responses and defending of the Class Representative's deposition, reviewing various settlement proposals and explaining the terms to the Class Representative, and assisting lead counsel in various tasks related to the discovery responses and preparation for the Class Representative's deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Bangs McCullen Law Firm's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Bangs McCullen Law Firm during this period of time was 58.50, with a corresponding lodestar based on current rates of $13,162.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This

summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Bangs McCullen Law Firm.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Bangs McCullen Law Firm has incurred during the course of this litigation. Bangs McCullen Law Firm expended a total of $70.96 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Bangs McCullen Law Firm on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Bangs McCullen Law Firm in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017 at Rapid City, South Dakota.

/s/ Eric J. Pickar

ERIC J. PICKAR

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BANGS MCCULLEN BUTLER FOYE & SIMMONS
CURRICULUM VITAE

The Bangs McCullen Law Firm began over 130 years ago, when South Dakota was still part of the Dakota Territory. A. W. Bangs began practicing law when wagon trains still traversed the prairie. While the legal landscape has changed over the last 100 years, our commitment to hard work, advocacy and excellence has not. From its roots in the 1880s, the Bangs McCullen law firm has grown from a small "store front" practice to a law firm with offices in Rapid City and Sioux Falls. Our partners, associates and support staff serve clients throughout South Dakota, North Dakota, Wyoming, Nebraska, Minnesota, and Iowa, as well as national clients.

The Bangs McCullen Law Firm is a full service firm that brings an unrivaled passion to its work – and to the clients it serves. To that end, we believe that knowledge and experience matter. Whether we are serving national insurance defense clients, health care institutions, banks, corporations, local businesses, or individuals, we believe that our clients deserve a trusted legal team. Our attorneys bring dedication to all of our work, and this is reflected in the results we achieve.

Our Firm is rated by Martindale-Hubble as preeminent.

The Firm's Attorneys

Charles L. Riter

Chuck Riter attended Northwestern University and graduated from the University of South Dakota and the University of South Dakota School of Law. Prior to joining Bangs McCullen, Chuck practiced as an attorney with the Office of District Counsel of the Internal Revenue Service in St. Paul, Minnesota. He has lectured extensively on wills, trust and estate matters as well as tax matters to a wide range of organizations and groups, including the South Dakota Bar Association. Chuck is listed in The Best Lawyers in America and Chambers Leading Lawyers. He is a fellow of the American College of Trust and Estate Counsel and the American Bar Foundation. He is a member of the Pennington County Bar, State Bar of South Dakota and the American Bar Association as well as a member of the IRS Liaison Committee (1971-1977, 1978-1983). He is admitted to practice in all South Dakota state and federal courts, and the United States Tax Court. His practice concentrates on wills, trusts, estate planning, probate, charitable giving, tax matters and business law. He is rated AV-PREEMINENT by Martindale-Hubble.

Allen G. Nelson

Upon graduating from Sioux Falls College in 1964, Allen Nelson served as a First Lieutenant in the United States Army in Vietnam. Al received his law degree from the University of South Dakota School of Law and served as the Editor-in-Chief of the South Dakota Law Review. He was admitted to practice in 1972 and served for one

year as a law clerk in the United States District Court in Rapid City, South Dakota. His practice emphasizes Condemnation Litigation, Will and Estate Contests, Cooperative Law and Municipal Land Development Issues. Al is a member of the American Bar Association, South Dakota Bar Association and the Cooperative Bar Association. His current practice emphasis is Cooperative Law, Condemnation, Land Development, Zoning Issues and Will and Estate Contests. He is rated AV-PREEMINENT by Martindale-Hubble.

James P. Hurley

James Hurley, a South Dakota native, is a 1974 graduate of the University of South Dakota School of Law. He joined the firm in 1976. Jim is a Past President of the University of South Dakota Moot Court Board, and he served as a law clerk in the United States District Court in Rapid City. Prior to law school, Jim served as an infantry Captain with the United States Army in Vietnam. Jim is a member of the Order of Barristers, the National Academy of Trial Lawyers, the South Dakota Trial Lawyers Association, and the Association of Trial Lawyers of America. He is a Past President of the Pennington County Bar Association. He concentrates his practice in areas of litigation involving commercial law, bankruptcy law, agricultural law, banking law, and personal injury law. Jim is regularly listed in the publication entitled The Best Lawyers in America. He is rated AV-PREEMINENT by Martindale-Hubble.

Michael M. Hickey

Mike Hickey, a Rapid City native, is a graduate of Creighton University and the University of South Dakota School of Law. He was a Senior Editor of the South Dakota Law Review and authored an article on water law. Following law school, Mike served as a law clerk for the judges of the Sixth Judicial Circuit in Pierre, South Dakota. Mike is a Great Plains Super Lawyer and is listed in the Best Lawyers of America in the areas of Administrative Law, Labor and Employment Law and Workers Compensation. He is also listed in Chambers, U.S.A. and carries an A rating from Martindale-Hubbell. Since joining the firm in 1977, Mike concentrates his practice on trials, employment law, administrative law, water law, and mineral and natural resources law. He is rated AV-PREEMINENT by Martindale-Hubble.

Terry L. Hofer

Terry Hofer graduated from the University of South Dakota Law School in 1982 as a Sterling Honor Graduate. He served two years as a law clerk in the United States District Court with the Honorable Andrew W. Bogue. Terry's practice concentrates in the areas of construction, personal injury, products liability, civil litigation, and trial practice. Terry is a member of the American Bar Association, American Board of Trial Advocates, American Association for Justice, the State Bar of South Dakota, the South Dakota Trial Lawyers Association, the South Dakota Defense Lawyers

Association, and the Pennington County Bar Association. He is rated AV-PREEMINENT by Martindale-Hubble.

Rodney W. Schlauger

Rod graduated Magna Cum Laude from Bethel College in 1987 and the University of South Dakota School of Law in 1990. He has been practicing with the firm since graduation and is a member of the South Dakota, Minnesota, North Dakota, and Nebraska State Bars. He is also a member of the Order of the Barrister and has been elected to the Board of Governors of the South Dakota Trail Lawyers Association. Rod's practice focuses on commercial and construction litigation, personal injury, banking, and real estate law, including real property litigation.

Daniel F. Duffy

Dan Duffy is a partner in the Litigation Department in our Rapid City Office. He concentrates his practice in the defense areas of medical and hospital malpractice, nursing home litigation, healthcare litigation, legal malpractice and general litigation. Dan has extensive litigation and trial experience in medical and hospital malpractice, as he has represented major hospitals, medical clinics, physicians, nurses and other allied health professionals involved in litigation. He has also represented attorneys involved in litigation, as well as other major businesses and companies involved in commercial and products liability litigation. Dan is a member of the Defense Research Institute, including its healthcare subsection, as well as the Association of Defense Trial Attorneys, The International Association, the South Dakota Trial Lawyers Association, and the State Bar of South Dakota. In addition, he became a fellow of the International Society of Barristers in 2006. A 1983 graduate of Dakota Wesleyan University, Dan was a two-time Academic All-American basketball player. He spent the following year playing professional basketball in Limerick, Ireland. Dan is a 1990 graduate of the University of South Dakota School of Law, where he served as President of the Moot Court Board. Following his law school graduation, he served as a law clerk for the United States District Court for the District of South Dakota. Dan has an AV-PREEMINENT rating from Martindale-Hubbel, the highest rating given to attorneys. He is also listed in *Best Lawyers in America*, and *Chambers USA* lists him as an "excellent trial lawyer." He is rated AV-PREEMINENT by Martindale-Hubble.

Jeffrey G. Hurd

Jeff Hurd is a partner in the Litigation Department in our Rapid City office. He concentrates his practice in business litigation, health care law and litigation, and representing religious entities and clergy. Jeff has extensive experience in complex cases involving disputes between shareholders and partners, breach of contract and fraud claims. Jeff also has a broad spectrum of experience defending malpractice claims against nursing homes and hospitals, as well as general health care issues, including Medicare and Medicaid reimbursement issues. He represents some of the

region's largest businesses, as well as small start-up businesses, hospitals, nursing homes, physicians, and clinics. In addition to considerable trial experience, Jeff also has experience arbitrating, mediating, and negotiating disputes to resolution. He is a 1990 graduate of the University of South Dakota School of Law, where he served as Articles Editor of the South Dakota Law Review. Following Graduation, he served as a law clerk to the Chief Judge of the United States District Court for the District of South Dakota, and has practiced with Bangs McCullen since 1992. He is rated AV-PREEMINENT by Martindale-Hubble.

John H. Raforth

John Raforth graduated from the University of South Dakota School of Law in 1985. He also has a Master's Degree in Accounting from the University of South Dakota Graduate Business School and a Master's in Law (L.L.M.) in Taxation Degree from the University of Denver Law School. He holds an undergraduate degree in Business Administration with an accounting emphasis from Concordia College in Moorhead, Minnesota. John's practice focuses on federal, state, and local tax planning and controversy issues, business transactions, strategic business planning and advice, and estate and trust matters, including perpetuities (dynasty) trust formation and planning issues. He is a Certified Public Accountant and has practiced as a tax specialist with Deloitte Haskins & Sells (presently Deloitte & Touche), both domestically and in Saudi Arabia. Prior to joining Bangs McCullen, John practiced law with national and regional firms, including San Francisco- based Heller, Ehrman, White & McAuliffe. He also has been a state law author of chapters in State Limited Partnership Laws and State Limited Liability Company Statutes published by Aspen. John is a frequent presenter to the State Bar of South Dakota on tax and probate matters. He is rated AV-PREEMINENT by Martindale-Hubble.

Terry G. Westergaard

Terry Westergaard is a partner in the Litigation Department in our Rapid City Office. He concentrates his practice in the areas of insurance law and litigation and construction litigation. Terry has extensive experience in insurance coverage claims and complex insurance litigation. Terry is a member of the Defense Research Institute, the South Dakota Trial Lawyers Association, and the State Bar of South Dakota. He is a 1990 graduate of the University of South Dakota School of Law and has practiced with Bangs McCullen since 1998.

Steven R. Nolan

Steven R. Nolan, a Rapid City native, practices in the areas of personal injury, family law, workers compensation, real estate, and insurance law. Steve obtained his undergraduate degree from the University of South Dakota. While attending law school, he was a member of the Client Counseling and Negotiations Board. After graduation, Steve served as a law clerk for the judges of South Dakota's Fourth Judicial Circuit Court. Professionally, Steve is a member of the South Dakota Bar

Association, South Dakota Trial Lawyers Association, American Bar Association, and the Pennington County Bar Association. Mr. Nolan is admitted to practice law in state and federal courts in South Dakota. In the community, he is a member of the Rapid City Chamber of Commerce; Junior Achievement of the Black Hills; and is actively involved in several youth athletic associations in Rapid City.

Gregory J. Erlandson

Greg Erlandson graduated from the University of South Dakota School of Law in 1997. Prior to attending law school, Greg served in the United States Marine Corps and was then employed with a lobbying association during the State's legislative session. While attending the Law School, he served as the President of the Client Counseling and Negotiations Board and as a member of the Law School Disciplinary Committee. Upon graduation from law school, Greg served as the law clerk for the Chief Justice of the South Dakota Supreme Court. He is active in the South Dakota and American Bar Association and a member of several committees on a State and national level. He is admitted to practice in South Dakota State and Federal Courts, the Sicangu Oyate (Rosebud Sioux Tribe) Courts, the Eighth Circuit Court of Appeals, and the United States Supreme Court. He has been named in The Best Lawyers in America, Top Great Plains Lawyers, and is rated AV-PREEMINENT by Martindale-Hubble.

Victoria M. Duehr

Victoria M. Duehr graduated from South Dakota State University in 1991. She attended the University of South Dakota School of Law and graduated in 1995 with Sterling Honors. Following graduation, she clerked for Judges in the Second Judicial Circuit of South Dakota. She practiced in Brookings, South Dakota, until joining Bangs McCullen law firm in 2003. Her practice concentrates in the areas of family law and civil litigation.

Eric J. Pickar

Eric Pickar received a Bachelor of Science in Psychology from South Dakota State University, graduating with high honors in 2000. In 2003, he graduated from the University of South Dakota School of Law. While attending law school, Eric was a published editor of the Volume 48 South Dakota Law Review, a member of the USD School of Law Trial Team, and also a teacher for the USD English Department. Additionally, he served as an editor for Moot Court, as President of the Delta Theta Phi Law fraternity, and as a member of the School of Law Disciplinary Board. Eric joined Bangs McCullen immediately after graduating from the USD School of Law. Eric is a member of the Pennington County Bar Association, the South Dakota Trial Lawyers Association, the Association of Trial Lawyers of America, and the American Bar Association. His practice primarily focuses on antitrust litigation, criminal defense, family law, and civil litigation.

Sarah E. Baron Houy

Sarah received her undergraduate degree in Business Administration, Marketing Emphasis, from the University of South Dakota. She received her Juris Doctorate from the University of Missouri-Columbia in 2006, graduating in the top 25% of her class. While at Mizzou, Sarah received several awards in recognition of her outstanding academic performance. Upon graduation, she spent one year clerking for the Fifth Judicial Circuit in Aberdeen, South Dakota. Sarah is licensed to practice law in South Dakota and Missouri and is admitted in the District Court for the District of South Dakota, the Eighth Circuit Court of Appeals, and the United States Supreme Court.

Kathryn J. Hoskins

Kathryn works as a trial lawyer and litigation attorney in the firm's Sioux Falls Office, but represents clients throughout the State of South Dakota, where she is licensed to practice in State and Federal Courts. Her educational background and training is in Nursing. She earned her Bachelor's Degree in Nursing from Augustana College in Sioux Falls and worked as a full-time critical care nurse both before, and during, law school. The character traits that made her an excellent nurse (a strong work ethic, compassion and kindness, and a meticulous attention to detail) have also provided the foundation for her successful litigation practice that has involved defending medical malpractice cases and representing medical professionals in regulatory and professional licensing matters.

Jeff L. Bratkiewicz

Jeff attended South Dakota State University and earned his law degree from the University of South Dakota in 2000. After completing law school, he spent two years as a law clerk to the Honorable Lyle E. Strom, a Senior U.S. District Court Judge in Omaha, Nebraska. Jeff joined Bangs McCullen in 2015. Before joining the firm, Jeff was a litigation attorney and partner in an established Sioux Falls law firm. Jeff has civil jury trial experience in state and federal trial and appeal courts. Jeff has an AV rating from Martindale-Hubbell and was recognized as a Great Plains Super Lawyer in 2014 and 2015.

Benjamin Tronnes

Benjamin Tronnes, an Associate in our Rapid City office, graduated from the University of South Dakota School of Law in 2013. In law school, Ben received the 2013 International Academy of Trial Lawyers Student Advocate Award for his work on the Trial Team. Ben holds a Bachelor's Degree in English from Northern State University (magna cum laude). Ben is licensed to practice in South Dakota and is a member of the American Bar Association.

Mark Marshall

Mark F. Marshall grew up in Huron, South Dakota, and was admitted to the practice of law in 1981. The breadth of his work since that time has given him insights from what are usually opposite sides of the spectrum – representing both plaintiffs and defendants, in both civil and criminal matters, and on both sides of the state. He has also experienced the courtroom on both sides of the bench, having served as a United States magistrate judge and a state court magistrate. A skilled and compassionate mediator, Mark also has the broad vision of one who has been in the neutral position. Mark is a fellow of the American Academy of Appellate Lawyers

Kelsey Parker

Kelsey, an associate in our Rapid City office, was born and raised in Rapid City. She obtained her Bachelor's Degree in Health Care Administration from the University of Nevada-Las Vegas (2010) and her Juris Doctorate degree from the University of South Dakota School of Law (2014). In law school, Kelsey was a member of the USD Moot Court Board. She participated in Duberstein Bankruptcy Competition in Queens, New York and Pepperdine University Entertainment Law Tournament in Malibu, California. During her final year of law school, she worked as a research assistant for the South Dakota Board of Regents. After law school, Kelsey served as a law clerk for the Seventh Judicial Circuit Court. She is a member of the South Dakota Bar Association and the American Bar Association.

Emily Swanson

Emily Swanson joined our Rapid City office as an associate in 2016. She is a 2014 sterling academic graduate of the University of South Dakota School of Law. In law school, Emily was Vice President of the Trial Team and a member of the Alternative Dispute Resolution Board. After law school, she worked as a law clerk for the Seventh Judicial Circuit Court in Rapid City. Emily holds Bachelor's Degrees from USD in Political Science and English.

Rachel Taylor

Rachel is a 1999 graduate of the USD School of Law, where she served as Editor-in-Chief of the South Dakota Law Review and a teaching assistant. Prior to law school, Rachel worked as a CPA in the areas of personal and business tax return preparation and for-profit and non-profit auditing. She also spent some time in the private sector, working in the finance department of a hospital in Durango, Colorado.

Rachel interned at Bangs McCullen during law school and joined the firm as an associate after graduation, where she provided business/estate planning legal services for six years. Rachel retired from private practice in 2005 to focus on her family and her small business. Much to the firm's delight, she returned in 2015 and

has resumed her practice in the areas of wills, trusts, estate planning, probate, and business law.

Bangs McCullen Law Firm has represented South Dakota class representatives in prosecuting the following price-fixing antitrust matters:

In re Aspartame Antitrust Litigation, United States District Court for the Eastern District of Pennsylvania, No. 06-CV-1732.

In re Cathode Ray Tube (CRT) Antitrust Litigation, United States District Court for the Northern District of California, Case No. 07-cv-5944.

In re Dynamic Random Access Memory (DRAM) Antitrust Litigation, United States District Court for the Northern District of California, MDL No. 1486.

In re Flash Memory Antitrust Litigation, United States District Court for the Northern District of California, Case No. 07-cv-086.

In re Graphics Processing Units Antitrust Litigation, United States District Court for the Northern District of California, Case No. 06-cv-7417.

In re OSB Antitrust Litigation, United States District Court for the Eastern District of Pennsylvania, Case No. 06-826.

In re Static Random Access Memory (SRAM) Antitrust Litigation, United States District Court for the Northern District of California, Oakland Division, Case No. 07-cv-1819.

In re TFT-LCD (Flat Panel) Antitrust Litigation, United States District Court for the Northern District of California, San Francisco Division, Case No. 07-cv-1827.

In re: Lithium Ion Batteries Antitrust Litigation, United States District Court, Norther District of California, Oakland Division, Case No. 13-MD-02420 YGR (DMR)

EXHIBIT B

EXHIBIT B

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

Firm Name: BANGS MCCULLEN LAW FIRM **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Eric J. Pickar (P)	5.80		11.30		30.10				2.40		7.90	1.00			58.50	$225.00	$13,162.50
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**5.80**	**0.00**	**11.30**	**0.00**	**30.10**	**0.00**	**0.00**	**0.00**	**2.40**	**0.00**	**7.90**	**1.00**	**0.00**	**0.00**	**58.50**		**$13,162.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**5.80**	**0.00**	**11.30**	**0.00**	**30.10**	**0.00**	**0.00**	**0.00**	**2.40**	**0.00**	**7.90**	**1.00**	**0.00**	**0.00**	**58.50**		**$13,162.50**

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EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BANGS MCCULLEN LAW FIRM

ATTORNEYS	DATE RANGE	HOURLY RATE
Eric J. Pickar	6/1/13 – 1/28/17	$225.00

NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

(REDACTED)

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

June 2013

Date	TK	Task Codes	Hours Worked	Work Performed
6/30/2013	EJP	9	0.10	Receipt and review of email from Jacqueline Verducci regarding the need to have [redacted]
6/30/2013	EJP	9	0.30	Review of Order and Exhibit A.
6/30/2013	EJP	9	0.10	Forwarded the email on to [redacted] for his review.
Total Hours Billed			0.50	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

September 2014

Date	TK	Task Codes	Hours Worked	Work Performed
9/20/2014	EJP	9	0.10	Receipt and review of correspondence and attachments from Lasha Garcia regarding status update and request for completed responsive documents.
9/20/2014	EJP	9	0.40	Call to [redacted] to discuss and advise, and set up a time to review and sign the declaration of document preservation.
9/23/2014	EJP	9	0.80	[redacted]
9/23/1014	EJP	9	0.50	[redacted]
9/23/2014	EJP	9	0.10	Prepared correspondence to Ms. Verducci and Ms. Garcia to transmit the requested documents.
Total Hours Billed			1.90	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

April 2015

Date	TK	Task Codes	Hours Worked	Work Performed
4/30/2015	EJP	11	0.50	Call to Attorney Nate Cihlar - discussed status of this matter and the upcoming discovery issues to address with [redacted]
4/30/2015	EJP	11	0.50	[redacted]
Total Hours Billed			1.00	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

May 2015

Date	TK	Task Codes	Hours Worked	Work Performed
5/6/2015	EJP	3	0.20	Review of and reply to email from Carla Voight regarding additional information needed from [redacted] to respond to discovery requests.
5/6/2015	EJP	3	0.20	Call to [redacted] to discuss the additional information needed.
5/7/2015	EJP	3	0.20	Receipt and review of email from [redacted] with answers to the questions we discussed yesterday.
5/7/2015	EJP	3	0.10	Forwarded the same email on to Carla Voight and Nate Cihlar at Straus & Boies.
5/7/2015	EJP	3	0.50	[redacted]
5/13/2015	EJP	3	0.10	Receipt and review of email from Carla Voight of Straus & Boies regarding the interrogatory response for [redacted]
5/13/2015	EJP	3	0.70	Review of draft Responses to Defendants' First Set of Interrogatories.
5/13/2015	EJP	3	0.10	Forwarded the email on to [redacted] with instructions.
5/13/2013	EJP	3	0.10	Email to Carla regarding the receipt [redacted] received from Verizon.
5/21/2015	EJP	3	0.20	Call to [redacted] to discuss status of the signed Verification. Receipt of faxed Verification from [redacted]
5/21/2015	EJP	3	0.10	Emailed the signed Verification to Carla Voight.
Total Hours Billed			2.50	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

September 2015

Date	TK	Task Codes	Hours Worked	Work Performed
9/15/2015	EJP	11	0.10	Review of email from Carla Voigt regarding setting up a conference call with [redacted] pursuant to the latest discovery requests.
9/15/2015	EJP	11	0.10	Replied to Ms. Voigt's email regarding a conference call.
9/15/2015	EJP	11	0.10	Email to [redacted] to determine his availability for the conference call to discuss discovery issues.
9/18/2015	EJP	11	0.10	Call to [redacted] to discuss his availability for a conference call to discuss discovery issues.
9/18/2015	EJP	11	0.10	Email to Carla Voight to advise.
9/21/2015	EJP	11	0.20	Email correspondence with [redacted] and Carla Voigt regarding scheduling of a conference call to discuss issues.
9/21/2015	EJP	11	0.30	Conference call with Carla, Angeline, and [redacted] to discuss and search Chris' email accounts.
9/24/2015	EJP	11	0.20	Call from [redacted] provided him with a status update on the litigation.
Total Hours Billed			1.20	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P.
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

November 2015

Date	TK	Task Codes	Hours Worked	Work Performed
11/7/2015	EJP	3	0.20	Review of email from Carla Voigt regarding the Indirect Purchaser Plaintiffs' Supplemental Objections and Responses to Defendants' 2nd Set of Interrogatories to IPP, and the need for a verification from [redacted] of the same.
11/7/2015	EJP	3	0.10	Contacted [redacted] to discuss discovery and the verification form; emailed him the documents for his review.
11/12/2015	EJP	3	0.10	Email to [redacted] to follow up on my last email regarding the need for the verification form.
11/12/2015	EJP	3	0.10	Call from [redacted], he will review the documents and fax me the verification form tomorrow.
11/12/2015	EJP	3	0.10	Review of and reply to email from Carla Voigt regarding status.
11/13/2015	EJP	3	0.10	Receipt of the signed Verification Form from [redacted]
11/13/2015	EJP	3	0.10	Emailed the same to Carla Voigt.
Total Hours Billed			0.80	

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333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

December 2015

Date	TK	Task Codes	Hours Worked	Work Performed
12/3/2015	EJP	11	0.10	Review of email from Carla voight regarding the Defendant's desire to take the deposition of [redacted]
12/3/2015	EJP	11	0.70	Call to Chris to advise, discussed the status of the case and the deposition.
12/4/2015	EJP	11	0.20	Review of email from [redacted] replied to the same.
12/4/2015	EJP	11	0.10	Email to Carla Voight and Nathan Cihlar to coordinate dates for Chris' deposition preparation and deposition.
12/7/2015	EJP	11	0.10	Review of and reply to email from Carla Voigt regarding the scheduling of [redacted] deposition.
12/18/2015	EJP	11	0.10	Review of and reply to email from Carla Voigt regarding scheduling of the deposition and deposition preparation.
Total Hours Billed			1.30	

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In Re: Lithium Ion Battery

January 2016

Date	TK	Task Codes	Hours Worked	Work Performed
1/4/2016	EJP	5	0.10	Review of email from Carla Voigt regarding the upcoming deposition of [redacted] and the deposition preparation sessions.
1/4/2016	EJP	5	0.10	Forwarded this email on to [redacted] review of his response requesting a later time for the preparation session on January 7th.
1/4/2016	EJP	5	0.20	Email correspondence with Carla Voigt regarding the same.
1/4/2016	EJP	5	1.10	Began review of the pleadings in preparation for the deposition preparation session.
1/5/2016	EJP	5	0.20	Review of letter from Heather Abrams to IPP regarding depositions of [redacted] in preparation for the deposition of [redacted]
1/5/2016	EJP	5	0.80	Review of Indirect Purchase Plaintiffs' Response to Defendants' First Set of Requests for Production of Documents, in preparation for the deposition of [redacted]
1/5/2016	EJP	5	1.00	Reread the Complaint in preparation for [redacted] deposition.
1/6/2016	EJP	5	0.10	Email correspondence with Carla Voigt regarding scheduling of the first preparation session with [redacted]
1/6/2016	EJP	5	0.70	Phone conference with [redacted] to answer his questions pertaining to deposition preparation.
1/7/2016	EJP	5	0.50	Conference call with [redacted] and attorneys Nate Cihlar and Lindsey Godfrey Eccles to discuss deposition preparation.
1/7/2016	EJP	5	1.00	Call from [redacted] engaged in additional phone conference with Chris to answer his questions, address his concerns, and further prepare him for his deposition.
1/8/2016	EJP	5	0.20	Email correspondence with Lindsey Godfrey Eccles and Nate Cihlar regarding the deposition preparation for [redacted]
1/8/2016	EJP	5	2.30	Reviewed [redacted] the purchase receipts, and the Indirect Purchaser Plaintiffs' Third Consolidated Amended Class Action Complaint (filed 10/22/14).
1/11/2016	EJP	5	1.50	Review of discovery documents.
1/11/2016	EJP	5	4.00	Office meeting with [redacted] and attorney Lindsey Godfrey Eccles to begin the preparation session for [redacted] deposition tomorrow; [redacted]

				[redacted]
1/11/2016	EJP	5	1.00	Reviewed with [redacted] a copy of the deposition transcript from a previous deposition to further prepare him for the types of questions that might be asked.
1/12/2016	EJP	5	1.10	Meeting with [redacted] for a final review of issues prior to his deposition.
1/12/2016	EJP	5	7.20	Attended and assissted in the defense of the deposition of [redacted]
1/12/2016	EJP	5	0.60	Conference with attorney Lindsey Godfrey Eccles and [redacted] following his deposition.
1/12/2016	EJP	5	0.20	Review of and reply to email from Carla Voigt to advise her of the deposition.
1/12/2016	EJP	5	0.70	Phone call from [redacted] answered his questions regarding his deposition.
1/13/2016	EJP	5	0.20	Email correspondence with Carla Voigt regarding the same.
1/13/2016	EJP	5	0.80	[redacted]
1/21/2016	EJP	5	0.10	Email correspondence with attorney Lindsey Godfrey Eccles regarding [redacted] signing the Protective Order.
1/21/2016	EJP	5	0.20	Review of the Protective Order.
1/21/2016	EJP	5	0.20	Call from [redacted] - discussed the Protective Order.
1/25/2016	EJP	5	0.20	[redacted]
1/28/2016	EJP	5	0.10	Review of email from attorney Lindsey Godfrey Eccles requesting a copy of the Verizon documents discussed at the deposition.
1/28/2016	EJP	5	0.10	Replied to her email to forward her a copy of the same and additional email regarding issues raised at the deposition.
1/28/2016	EJP	5	0.50	Completed full review of entire file to ensure no other documents existed beyond what had been provided.
1/29/2016	EJP	5	0.20	[redacted]
1/29/2016	EJP	5	0.60	[redacted]
1/29/2016	EJP	5	0.20	Emailed the signed Exhibit A to attorney Lindsey Godfrey Eccles.
Total Hours Billed			28.00	

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In Re: Lithium Ion Battery

February 2016

Date	TK	Task Codes	Hours Worked	Work Performed
2/19/2016	EJP	5	0.10	Review of email from Lindsey Godfrey Eccles requesting that I review the deposition transcript of Chris Bessette and return the Errata Sheet.
2/19/2016	EJP	5	0.10	Forwarded the transcript to [redacted] with instructions.
2/19/2016	EJP	5	1.10	Completed review of the transcript.
2/23/2016	EJP	5	0.10	Email to [redacted] tof ollow up on the previously sent emai regarding the transcript and the errata sheet.
2/25/2016	EJP	5	0.10	Call from [redacted]- he has no changes to make to the deposition transcript.
2/25/2016	EJP	5	0.10	Email to Lindsey Godfrey Eccles to advise.
2/26/2016	EJP	5	0.10	Review of and reply to email from attorney Lindsey Godfrey Eccles regarding the errata sheet.
2/29/2016	EJP	5	0.10	Review of email from attorney Lindsey Godfrey Eccles regarding the errata sheet to be signed by [redacted]
2/29/2016	EJP	5	0.20	Review of email from Krysta Kauble Pachman regarding additional discovery issues.
2/29/2016	EJP	5	0.10	Began review of file so as to be able to respond.
Total Hours Billed			2.10	

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In Re: Lithium Ion Battery

March 2016

Date	TK	Task Codes	Hours Worked	Work Performed
3/1/2016	EJP	3	0.10	Review of the correspondence from attorney Mark Rizik regarding document requests made with respect to [redacted] deposition.
3/1/2016	EJP	3	0.30	Review of the cited portions of [redacted] deposition transcript.
3/1/2016	EJP	3	0.10	[redacted]
3/1/2016	EJP	1	0.20	Replied to the email from attorney Krysta Pachman to address all issues.
3/1/2016	EJP	1	0.10	Review of and reply to her response.
3/1/2016	EJP	1	0.10	Review of the response email from Carla Voigt; replied to the same.
3/1/2016	EJP	1	0.10	Forwarded these emails onto [redacted]
3/2/2016	EJP	1	0.10	Review of and reply to email from Krysta Pachman confirming that I was not ware of any photos of the Toshiba laptop.
3/4/2016	EJP	1	0.10	Review and reply of email from attorney Krysta Pachman, advising that Defendants were seeking details regarding [redacted]
3/4/2016	EJP	1	0.20	Email to Chris requesting additional details.
3/8/2016	EJP	1	0.10	[redacted]
3/8/2016	EJP	1	0.10	Email to Krysta Kauble Pachman, Lindsey Godfrey Eccles, and Carla Voigt to advise.
3/8/2016	EJP	3	0.10	Review of email from attorney Pachman regarding the updated discovery responses to be signed by [redacted]
3/8/2016	EJP	3	0.10	Review of the discovery.
3/8/2016	EJP	3	0.10	Email to [redacted] regarding the discovery.
3/11/2016	EJP	3	0.20	Review of email from attorney Pachman, regarding the magistrate judge's recent rulings regarding discovery.
3/11/2016	EJP	3	0.50	Review of the discovery responses and verification forms attached to attorney Pachman's email.
3/11/2016	EJP	3	0.20	Replied to attorney Pachman's email.
3/11/2016	EJP	3	0.20	Forwarded attorney Pachman's email onto [redacted] with instructions.

3/11/2016	EJP	3	0.40	[redacted]
3/14/2016	EJP	3	0.10	Follow up email correspondence with [redacted] regarding the verification forms.
3/15/2016	EJP	3	0.20	[redacted]
3/15/2016	EJP	3	0.10	Call from Demetrius Lambrinos - advised him of the status of the signed Verification forms.
3/15/2016	EJP	3	0.10	Receipt of the Verification forms via fax from [redacted]
3/15/2016	EJP	3	0.10	Scanned and emailed the Verification forms to co-counsel.
3/16/2016	EJP	3	0.40	Engaged in email correspondence with attorney Demetrius Lambrinos regarding the verification forms completed by [redacted]
3/16/2016	EJP	3	0.40	[redacted]
3/16/2016	EJP	3	0.10	Received the revised Verification forms via fax from [redacted]
3/16/2016	EJP	3	0.10	Send the revised Verification forms to attorney Lambrinos.
3/18/2016	EJP	12	0.20	Review of correspondence from attorney Demetrius Lambrinos, regarding the proposed Settlement Agreement with the Sony defendants
3/18/2016	EJP	12	0.70	Examined the proposed Settlement Agreement so as to be able to discuss and explain the same with [redacted]
3/18/2016	EJP	12	0.10	[redacted]
3/21/2016	EJP	1	0.10	Review of email from Demetrius Lambrinos regarding additional searches to be conducted with [redacted]
3/21/2016	EJP	1	0.10	Forwarded the same to [redacted] with instructions.
3/21/2016	EJP	1	0.60	[redacted]
3/21/2016	EJP	1	0.10	Review of email from attorney Colleen Cleary, distributing the indirect Purchaser Plaintiffs' Fourth Consolidated Amended Complaint in In re Lithium Ion Batteries Litigation.
3/21/2016	EJP	1	1.00	Review of the Amended Class Action Complaint, prior to contacting [redacted] regarding the same, so as to be able to [redacted]
3/21/2016	EJP	1	0.10	Email to [redacted] to provide him with a copy of the Fourth Consolidated Amended Complaint.
3/23/2026	EJP	1	0.40	[redacted]
3/24/2016	EJP	1	0.30	Call to Demetrius Lambrinos - discussed the search term meeting with

				[redacted] yesterday evening. Discussed how best to resolve the current discovery issues.
3/24/2016	EJP	1	0.10	[redacted]
3/24/2016	EJP	1	0.10	Review of email from Demetrius regarding the revised interrogatory responses and verifications.
3/24/2016	EJP	1	0.20	Receipt and review of email and attached pleadings from Krysta Kauble Pachman containing the Amended and Supplemental Interrogatory Responses for [redacted] and the Verification.
3/24/2016	EJP	1	0.10	Forwarded the same to [redacted] with instructions
3/24/2016	EJP	1	0.10	Receipt and review of email from Krysta Kauble Pachman requesting that [redacted] execute the Errata sheet from his deposition.
3/24/2016	EJP	1	0.10	[redacted]
3/24/2016	EJP	1	0.30	[redacted]
3/28/2016	EJP	1	0.30	[redacted]
3/28/2016	EJP	1	0.10	Emailed the Errata Sheet and Verification to attorneys Krysta Pachman and Demetrius Lambrinos.
3/28/2016	EJP	1	0.10	Emailed attorney Lambrinos regarding [redacted] conversation with the customer service representative at Midco.
3/31/2016	EJP	1	0.10	Email correspondence with attorney Lambrinos regarding resuming the search of [redacted] e-mail data.
3/31/2016	EJP	1	0.30	Call to [redacted] to discuss.
3/31/2016	EJP	1	0.10	Email correspondence with attorney Pachman regarding the most recent Verification form signed by [redacted]
Total Hours Billed			10.70	

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In Re: Lithium Ion Battery

April 2016

Date	TK	Task Codes	Hours Worked	Work Performed
4/5/2016	EJP	3	0.20	[redacted] Email to attorney Demetrius
4/5/2016	EJP	3	0.10	Email to attorney Demetrius Lambrinos regarding [redacted] availability.
4/5/2016	EJP	3	0.30	Called in for the meeting that had been set up by Bryan Kim. This This meeting will need to be rescheduled due to the failure of several others to attend.
4/5/2016	EJP	3	0.10	Email correspondence with attorney Lambrinos to advise.
4/5/2016	EJP	3	0.10	Engaged in email correspondence with [redacted] to reschedule the meeting.
4/6/2016	EJP	3	0.20	Engaged in email correspondence regarding the records search meeting to be held later today.
4/6/2016	EJP	3	0.60	Participated in the Go To Meeting records search meeting, discussed discovery issues.
4/11/2016	EJP	3	0.90	Review of email and attachments from attorney Lambrinos regarding the first draft of the Interrogatory responses to Defendants' Third Set of Interrogatories we had discussed on Wednesday.
4/11/2016	EJP	3	0.10	Forwards the first draft of interrogatory responses onto [redacted]
4/11/2016	EJP	3	0.20	Prepared reline revisions of the draft responses for the information I had already.
4/11/2016	EJP	3	0.30	[redacted]
4/13/2016	EJP	3	0.10	[redacted]
4/13/2016	EJP	3	0.20	Completed the necessary redline revisions to the Objections and Responses to Defendant's 3rd Set of Interrogatories to Indirect Purchaser Plaintiffs.
4/13/2016	EJP	3	0.10	Followed up with [redacted] regarding receipt of the signed verification; he will fax today.
4/13/2016	EJP	3	0.10	Receipt and review of the same.
4/13/2016	EJP	3	0.10	Review of and reply to emails from attorney Lambrinos regarding photos produced in discovery.

4/13/2016	EJP	3	0.10	Engaged in further email correspondence on this issue with attorney Carla Voigt.
4/21/2016	EJP	3	0.30	[redacted]
Total Hours Billed			4.10	

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Tax Id No. 46-0108128

In Re: Lithium Ion Battery

November 2016

Date	TK	Task Codes	Hours Worked	Work Performed
11/22/2016	EJP	11	0.10	[redacted]
11/22/2016	EJP	11	0.60	[redacted]
11/22/2016	EJP	11	0.20	[redacted]
11/22/2016	EJP	11	0.20	Review of and replied to his response to answer his questions.
11/22/2016	EJP	11	0.10	[redacted]
11/23/2016	EJP	11	0.10	Review of, and reply to, email from Colleen Cleary regarding status of the case.
11/23/2016	EJP	11	0.10	Forwarded Colleen Clealry's email to Christopher Bessette re status.
Total Hours Billed			1.40	

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In Re: Lithium Ion Battery

December 2016

Date	TK	Task Codes	Hours Worked	Work Performed
12/19/2016	EJP	11	0.10	[redacted]
12/19/2016	EJP	11	0.70	[redacted]
12/19/2016	EJP	11	0.10	[redacted]
12/19/2016	EJP	11	0.50	[redacted]
12/19/2016	EJP	11	0.10	[redacted]
Total Hours Billed			1.50	

Bangs, McCullen, Butler, Foye & Simmons, L.L.P
333 West Blvd. Suite 400; Rapid City, SD 57701
Tax Id No. 46-0108128

In Re: Lithium Ion Battery

January 2017

Date	TK	Task Codes	Hours Worked	Work Performed
1/4/2017	EJP	11	0.10	[redacted]
1/4/2017	EJP	11	0.70	[redacted]
1/4/2017	EJP	11	0.20	Email to [redacted] to provide him with a copy and advise.
1/5/2017	EJP	11	0.40	Call to [redacted] - discussed the draft agreement and asnwered his questions; confirmed his approval of the same.
1/5/2017	EJP	11	0.10	[redacted]
Total Hours Billed			1.50	

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
BANGS MCCULLEN LAW FIRM
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	70.96
TOTAL:	$70.96

EXHIBIT 6

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF LESLEY E. WEAVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLEICHMAR FONTI AND AULD LLP**

I, Lesley E. Weaver, declare:

1. I am Partner of Bleichmar Fonti and Auld LLP ("BFA"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to City of Palo Alto and City of Richmond and as counsel for IPPs throughout the course of this litigation. The background and experience of BFA and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, BFA performed the following work: Settlement related research and conferring with leadership and clients regarding settlement negotiations and obtaining approvals.

5. Attached hereto as **Exhibit B** is a billing summary of BFA's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by BFA. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by BFA and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Lesley E. Weaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of BFA and filed on May 26, 2017. (ECF No. 1813-6). Counsel for Plaintiffs

did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by BFA since June 1, 2013 was 38.9, with a corresponding lodestar of $24,593.5 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses BFA has incurred from June 1, 2013 to present, plus applicable case filing fees. BFA expended a total of $126.75 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by BFA on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by BFA in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Oakland, CA.

/s/ Lesley E. Weaver

Lesley E. Weaver

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

BLEICHMAR
FONTI & AULD LLP



BLEICHMAR FONTI & AULD LLP

OVERVIEW

Bleichmar Fonti & Auld LLP ("BFA" or the "Firm") is a boutique law firm founded in 2014 with offices in New York City, Oakland, California, and Toronto, Canada. The Firm's strength is in plaintiff-side complex litigation, including the prosecution of antitrust, consumer, and securities actions on behalf of consumers, governmental entities, and institutional investors.

Since 2014, BFA has recovered over $17.6 billion for its clients. This remarkable accomplishment is due in part to the extensive experience of the Firm's partners in the last two decades prosecuting complex class actions. Indeed, while BFA is relatively new, our collective experience rivals that of older peer firms, as evidenced by our recognition as a top-ten firm measured by amount recovered in securities litigation in 2015 (ISS Securities Class Action Services' Top 50 Report for 2015) and a top 15 firm in 2016 (ISS Securities Class Action Services' Top 50 Report for 2016).

Since adding its consumer and antitrust practice in mid-2016, BFA has been appointed to lead two of the more significant antitrust/consumer cases, in addition to the Firm's leadership role in *In re Volkswagen "Clean Diesel" Litigation*, MDL No. 2672, which resulted in the largest automotive settlement in history. Most recently, the Firm was appointed to the Steering Committee of *In re German Autos Antitrust Litigation*.

Our attorneys are nationally recognized as leading litigators in the field of securities litigation, and our achievements have been profiled in a variety of national and international media, including *The Wall Street Journal*, *The New York Times*, *Law 360*, Law.com, the *National Law Journal's* Plaintiffs' Hot List, the *Legal 500*, ZDF Today, and Deutsche Welle TV. We are also frequently asked to comment on breaking developments in antitrust, consumer, financial fraud, securities, and other investment-related issues.

The Firm's clients include some of the largest pension funds in North America, as well as leading businesses and banking institutions.

BLEICHMAR FONTI & AULD LLP

APPOINTMENTS AND REPRESENTATION

In re Inductors Antitrust Litigation

- N.D. Cal. No. 18-cv-00198
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: Plaintiffs allege that Defendants, leading Japanese manufacturers of inductors such as Murata and Panasonic Corp., colluded to fix, inflate, or stabilize the price of inductors from at least 2003 until the summer of 2014, in violation of Section 1 of the Sherman Antitrust Act. Inductors are electronic components that work to regulate and store energy in a circuit and are found in thousands of products that rely on electronic circuits for power, such as computers, cars, and televisions.

BFA's Role: Judge Edward J. Davila appointed BFA as Co-Lead Class Counsel, noting that "the efforts expended by BFA and Hausfeld to promptly identify and investigate the claims, coupled with the extensive amount of resources which they have available to expend on this case, renders them superior to represent the putative class."

In re German Automotive Manufacturers Antitrust Litigation

- MDL No. 2796
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: BFA was one of the first law firms to file suit against German automobile manufacturers and supplier Bosch, alleging the largest known single automobile cartel in U.S. and European history. The action claims that Audi, BMW, Daimler/Mercedes-Benz, Porsche, and Volkswagen engaged in a 20-year cartel to suppress the development of technology in their automobiles from 1996 until at least 2015, as admitted by Daimler and VW to European regulators. The cartel allowed the car manufacturers to reduce research and development costs amongst themselves, while charging customers premiums for their supposed "quality and innovation" and suppressing alternatives that would have been provided by real competition.

BFA's Role: Judge Charles R. Breyer appointed partner Ms. Weaver from a field of 38 applicants to the Plaintiffs' Steering Committee.

In re Disposable Contact Lens Antitrust Litigation

- MDL No. 2626
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: Plaintiffs allege claims for horizontal and vertical conspiracies in violation of state and federal antitrust laws due to unilateral pricing policies of four leading contact lens manufacturers. Plaintiffs have settled with Defendant CooperVision, Inc. for $3 million.

BFA's Role: BFA is leading discovery efforts against the largest manufacturer.

BLEICHMAR FONTI & AULD LLP

In re Domestic Airlines Travel Antitrust Litigation	**Case Status: Pending**
• District of Columbia, No. 1:15-mc-01404 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege a conspiracy by the four largest commercial air passenger carriers in the United States—American Airlines, Inc., Delta Airlines, Inc., Southwest Airlines Co., and United Airlines, Inc.—to fix prices for domestic air passenger transportation services in violation of the Sherman Act by colluding to limit capacity on their respective airlines. Plaintiffs have settled for $15 million with Defendant Southwest Airlines and $45 million with Defendant American Airlines.

BFA's Role: BFA is a key part of Plaintiffs' nonparty discovery committee and has led meet and confer negotiations with dozens of nonparties, resulting in the production of some of Plaintiffs' best evidence.

In re Blood Plasma Antitrust Litigation	**Total Settlements: $128 Million**
• MDL No. 2109 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that Defendants participated in a multi-year conspiracy to restrict output and fix prices of Ig and albumin in the United States.

BFA's Role: Ms. Weaver played a significant role, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants.

In re Lithium Ion Batteries Antitrust Litigation	**Total Settlements: $64.5 Million**
• MDL No. 2420 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants and their co-conspirators engaged in an unlawful conspiracy to fix the prices of lithium ion battery cells, affecting the prices indirect purchasers paid for lithium ion batteries and lithium ion products. Indirect Purchaser Plaintiffs have settled their claims for $19.5 million from Sony Corp., $39 million from LG Chem Ltd., $3.45 million from Hitachi Maxwell Ltd., and $2.5 million from NEX Corp.

BFA's Role: BFA acts as counsel for the cities of Palo Alto and Richmond, California.

Result: On October 27, 2017, the Court gave final approval to the settlement between the IPPs and Hitachi Maxell, NEC Corporation, and LG Chem. The settlement is worth $45 million, bringing the total settlements with IPPs to $64.5 million.

In re Automotive Parts Antitrust Litigation	**Total Settlements: $604 Million**
• MDL No. 2311 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs alleged that a group of auto parts makers violated antitrust laws by engaging in bid-rigging and price-fixing.

BFA's Role: In the case against manufacturers of wire harnesses, BFA represented Oakland County, Michigan, Traverse City, Michigan, the Village of Northport, New York, Mecklenburg County, North Carolina, and Richmond, California.

Result: BFA's clients settled on a non-class basis far in excess of the entities' actual damages. BFA took no fees related to that settlement.

In re LIBOR-Based Financial Instruments Antitrust Litigation	**Case Status: Pending**
• MDL No. 2262 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants' manipulation of U.S. Dollar LIBOR allowed them to pay unduly low interest rates to purchasers of U.S. Dollar LIBOR-based financial instruments, allowing defendants to reap hundreds of millions, if not billions, of dollars in ill-gotten gains. Plaintiffs have secured settlements of $120 million from Barclays Bank PLC, $130 million from Citigroup Inc., $240 million from Deutsche Bank AG, and $100 million from HSBC, for a total of $590 million.

BFA's Role: BFA joined the case to represent Community Bank & Trust and now also serves as allocation counsel in the matter.

In re Liquid Aluminum Sulfate Antitrust Litigation	**Case Status: Pending**
• MDL No. 2262 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants entered into an unlawful conspiracy involving bid rigging, market allocation, and price fixing to eliminate competition in the liquid aluminum sulfate market.

BFA's Role: BFA represents Oakland County, Michigan.

In re Packaged Seafood Products Antitrust Litigation	**Case Status: Pending**
• MDL No. 2670 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege defendants entered into a conspiracy involving packaged seafood product in violation of the Sherman Act and state antitrust law.

BFA's Role: BFA is part of a critical discovery effort against a key defendant.

In re Facebook, Inc. Consumer Privacy User Profile Litigation	**Case Status: Pending**
• MDL No. 2843 • Lead BFA Attorney: Lesley Weaver	

Background: The litigation consolidates more than 30 cases filed around the country alleging that Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' personally identifiable information without their knowledge or consent.

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BFA's Role: Judge Chhabria of the Northern District of California appointed Ms. Weaver as Co-Lead Counsel for Plaintiffs.

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation • MDL No. 2672 • Lead BFA Attorney: Lesley Weaver	**Total Settlements: $17 Billion**

Background: The case involves claims against Volkswagen, Audi and Porsche in connection with the widely-reported news that the companies had installed emission systems created to avoid regulator detection and defraud customers who believed they were buying Volkswagen and Audi vehicles with "clean diesel" engines. VW admitted that it installed these "defeat devices," which eliminated the emissions reduction during normal driving, and only allowed for reduced fuel emissions when the automobiles were being tested. More than 500 federal lawsuits have been filed and consolidated into one complaint against the automaker for its "dirty diesel" vehicles.

BFA's Role: Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee, which, along with lead counsel, has been described as the "dream team" prosecuting this high-profile emissions scandal. Judge Breyer selected Ms. Weaver from a field of 150 of the nation's finest attorneys. Ms. Weaver's leadership position in the case included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH's significant role in multiple schemes to place software in vehicles purposefully designed to evade emissions laws.

Result: Lead Counsel and the Plaintiffs' Steering Committee have achieved settlements for Plaintiffs worth a total of $17 billion, the largest automotive class action recovery in history. This includes a $14.7 billion dollar settlement on behalf of eligible owners of Volkswagen and Audi 2.0-liter TDI cars, who were offered a buyback of their cars. In accordance with the consent decree, $2.7 billion of the settlement will be allocated to projects to reduce nitrogen oxides emissions, with a focus on improving air quality in areas that "bear a disproportionate share of the air pollution burden within their jurisdiction." As the Justice Department's top environmental attorney John Cruden has highlighted, this focus on remediation in low income and minority communities is "unique," and a significant response to the disproportionate pollution burden felt by these communities.

In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability • MDL No. 2777 • Lead BFA Attorney: Lesley Weaver	**Case Status: Pending**

Background: The class alleges that Fiat Chrysler Automobiles deliberately cheated on emission testing of 2014-2016 model Dodge and Jeep trucks marketed and sold as environmentally friendly "eco-diesel" vehicles.

BFA's Role: Judge Edward Chen of the U.S. District Court for the Northern District of California appointed Ms. Weaver as one of nine members of the Plaintiffs' Steering Committee.

In re Twitter Inc. Securities Litigation • Northern District of California, No. 3:16-CV-05314 • Lead BFA Attorney: Lesley Weaver	**Case Status: Pending**

Background: Investors allege that Twitter executives omitted key metrics about daily active users ("DAU")—the type of users who actually drive advertising revenues for the company. In October 2017, Judge Jon Tigar denied Twitter's motion to dismiss. The judge held that "a strong inference arises [Twitter] knowingly misled the public [about] what was really happening with user engagement at Twitter," and that "[i]n the absence of DAU data, investors interpreted defendants' statements as reassurances that the Company had experienced and would continue to experience positive growth and engagement trends." Twitter's motion to dismiss also sought to excuse ex-CEO Dick Costolo and current COO and CFO Anthony Noto from the case, but Judge Tigar found that both men made misleading statements on earnings calls and in interviews.

BFA's Role: On December 22, 2016, Judge Tigar appointed BFA as liaison counsel to the class.

Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al. • District of Connecticut, No. 17-cv-00558 • Clients: Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System • Lead BFA Attorneys: Joseph Fonti, Wilson Meeks, III	**Case Status: Pending**

Background: Plaintiffs allege that the company and its senior management made materially false and misleading statements that concealed the fact that Teva was conspiring with other drug manufacturers to fix drug prices, in violation of United States antitrust law.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Ontario Teachers' and named plaintiff Anchorage Police and Fire Retirement System.

In re MF Global Holdings Ltd. Securities Litigation • Southern District of New York, No. 11-cv-07866 • Client: Alberta Investment Management Corp. (AIMCo) • Lead BFA Attorneys: Javier Bleichmar, Dominic Auld	**Total Settlements: $234.3 Million**

Background: This litigation arose from MF Global's dramatic bankruptcy in October 2011. Plaintiffs alleged that Defendants misrepresented the company's risk controls, liquidity position, and exposure to European sovereign debt, and failed to properly account for its deferred tax assets.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo.

Result: Lead Counsel achieved five partial settlements worth a total of just over $234 million on behalf of investors: (1) a $74 million settlement with Goldman Sachs and certain other underwriters of the company's securities; (2) a $64.5 million settlement with former officers and directors, including MF Global's former CEO Jon Corzine; (3) a $65 million settlement with auditor PricewaterhouseCoopers; (4) a $29.825 million settlement with Jefferies and other underwriters of the final bond offering issued during

the Class Period; and (5) a separate $932,828 settlement with another underwriter defendant associated with that last offering. These settlements represent a recovery of approximately 35% of the alleged damages—an excellent result, particularly in light of the issuer's bankruptcy.

These settlements were achieved after years of hard fought litigation. Following the Court's ruling sustaining the Complaint and denying Defendants' six motions to dismiss in their entirety, Co-Lead Counsel reviewed millions of documents produced by Defendants and third-parties, and conducted more than 50 depositions of former employees of MF Global and other key witnesses, including four days of testimony from former CEO Jon Corzine. The Court granted Plaintiffs' motion for class certification on October 14, 2015, which assisted in achieving the settlements.

In re Genworth Financial Inc. Securities Litigation

- Eastern District of Virginia, No. 14-cv-00682
- Client: Alberta Investment Management Corp. (AIMCo)
- Lead BFA Attorneys: Joseph Fonti, Wilson Meeks, III

Total Settlement: $219 Million

Background: Plaintiffs alleged that Defendants misrepresented the profitability of the company's core business and reported false financial results by grossly understating long-term care insurance reserves. When Genworth announced a $531 million charge to its reserves, the company's stock price fell more than 55%—wiping out billions in market capitalization—and credit rating agencies downgraded the company and its corresponding debt to "junk" status.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. On March 10, 2016, Genworth announced a proposed settlement of $219 million, the largest ever securities class action recovery achieved in Virginia, and as much as 44% of recoverable damages available at trial. BFA and AIMCo sought and achieved a significant contribution from the company beyond available insurance; despite significant liquidity issues, the company paid $69 million, and the remaining $150 million was funded by insurance.

Result: The settlement was reached after 15 months of intense and complex litigation. The Eastern District of Virginia is known as the "rocket docket" for its rapid disposition of cases and strict adherence to scheduled deadlines. In December 2014, Lead Plaintiffs filed a consolidated complaint and, in February 2015, Defendants filed a motion to dismiss. Partner Joseph Fonti successfully argued against the motion on April 28, 2015, and the securities fraud claims were sustained on May 1, 2015. Lead Plaintiffs filed their motion for class certification on December 3, 2015; fact discovery closed on January 15, 2016; and expert discovery closed on February 11, 2016. In effect, BFA conducted two to four years of litigation in just 15 months. This effort included more than 20 depositions, extensive trial preparation, and full briefing on motions for class certification and summary judgment.

In re Weatherford International Securities Litigation

- Southern District of New York, No. 12-cv-02121
- Client: Anchorage Police and Fire Retirement System
- Lead BFA Attorneys: Javier Bleichmar, Wilson Meeks, III

Total Settlement: $120 Million

Background: Plaintiffs alleged that Weatherford, one of the world's largest oil and gas servicing companies, issued false financial statements that misled investors about its tax structure and internal

controls. The company allegedly overstated its earnings by more than $900 million and was forced to issue three restatements due to its failure to comply with Generally Accepted Accounting Principles.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff Anchorage.

Result: In June 2015, Weatherford agreed to settle all claims for $120 million of out-of-pocket cash, with no available insurance, or approximately 30% of recoverable damages. Achieving this settlement required more than three years of intense litigation, including defeating Defendants' motion to dismiss in its entirety; obtaining class certification; completing fact discovery, after more than 20 depositions and the review of more than eight million pages of documents; filing four expert reports; and preparing for expert discovery and summary judgment.

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TEAM PROFILES

LESLEY E. WEAVER *Partner*	**Oakland**	• **Email: lweaver@bfalaw.com** • **Tel: +1 415 445 4004** • **www.bfalaw.com/lesley-weaver**

Lesley E. Weaver is the Partner in Charge of Bleichmar Fonti & Auld LLP's California office, and the practice head of its Antitrust and Consumer team. In her twenty-year career, Ms. Weaver has focused primarily on cases that protect the public interest, consumers, and public entities. She has substantial leadership experience litigating complex antitrust and consumer-oriented class litigation, and has been appointed to leadership positions in some of the largest class actions in the country. Ms. Weaver has been named a "Super Lawyer" in the field of as Class Action & Mass Torts Attorneys.

On April 27, 2018, Judge Edward J. Davila appointed Ms. Weaver as interim Co-Lead Counsel in *In re Inductors Antitrust Litigation*, representing a class of purchasers of inductors, a passive electronic component that is a key element of electronic circuits found in smart phones, laptops, computers, and other consumer electronic devices.

In December 2017, Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re German Automotive Manufacturers Antitrust Litigation*. Consumers and suppliers allege that German automakers engaged in a 20-year cartel—the single largest known automobile cartel in U.S. and European history—to suppress the development of technology in their automobiles.

Ms. Weaver is leading the discovery committee against the defendant with the largest exposure in *In re Disposable Contact Lens Antitrust Litigation*, and is also working with the discovery team in *In re Packaged Seafood Antitrust Litigation*. Ms. Weaver has significant responsibility in *In re Domestic Airline Travel Antitrust Litigation*, including managing discovery concerning third parties through which substantial collusion allegedly took place. Ms. Weaver played a significant role in *In re Blood Plasma Antitrust Litigation*, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants. The case ultimately settled for $128 million.

She represents the Cities of Palo Alto and Richmond, California in a municipal subclass in *In re Lithium Ion Batteries Antitrust Litigation*. In *In re Automotive Parts Antitrust Litigation*, Ms. Weaver represented Oakland County, Michigan; Traverse City, Michigan; the Village of Northport, New York; Mecklenburg County, North Carolina; and Richmond, California in the case against manufacturers of wire harnesses that settled on a non-class basis far in excess of the entities' actual damages.

In July 2018, Judge Chhabria of the Northern District of California appointed Lesley as co-lead counsel for plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. The litigation consolidates more than 30 cases filed around the country alleging that Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' personally identifiable information without their knowledge or consent.

In June 2017, Judge Edward M. Chen appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. Ms. Weaver is

working closely with technical experts in that matter to determine if proposed fixes to the subject vehicles inflict additional damages upon class members.

In 2015, Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*. Ms. Weaver's leadership position in the *Volkswagen* litigation included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH's significant role in multiple schemes to place software in vehicles purposely designed to evade emissions laws. Plaintiffs in the Volkswagen litigation have recovered more than $15 billion for class members and nearly $5 billion for the environment, the largest automotive class action recovery ever.

Ms. Weaver has personally managed complex litigation on an enormous scale. In *In re Marsh & McLennan Cos., Inc. Securities Litigation*, as part of her day-to-day oversight of the case, she managed a document review team of 30 contract lawyers and a team of associates, who reviewed 50 million documents over the course of a year. More than 50 depositions were taken in the case.

In addition, Ms. Weaver has extensive experience representing sophisticated institutional investors in landmark securities actions. Some of those cases include *In re Cavanaugh Securities Litigation* (including an appeal to the Ninth Circuit concerning the method of selecting lead plaintiff and lead counsel after the enactment of the Private Securities Litigation Reform Act ("PSLRA")); *Marsh & McLennan* ($400 million settlement); *In re Cardinal Health Inc. Securities Litigation* ($600 million settlement); and *In re Cisco Systems, Inc. Securities Litigation* ($99 million settlement). Earlier, in the years following the passage of the PSLRA, Ms. Weaver litigated and won significant issues as the law was being developed and established. *See In re Northpoint Communications Group, Inc.* (holding that certain allegations of scienter and falsity in securities suit were pled with particularity as required by the PSLRA); *In re Commtouch Software, Ltd. Securities Litigation* (finding complaint was pled with sufficient particularity to support an inference of deliberate misconduct). Those matters ultimately settled for $20 million and $15 million, respectively.

Ms. Weaver's trial experience has spanned her career. In October 2014, Ms. Weaver tried an internet privacy case against a Chinese-owned, California-based internet site, delivering opening and closing statements. Plaintiffs recovered 100% of economic damages and won a $15 million punitive damages jury verdict, as well as significant injunctive relief. Her first trial was in 1998 before the Honorable Vaughn Walker against U.S. Customs on behalf of Amanda Buritica, a U.S. citizen born in Colombia who was unlawfully detained by U.S. Customs at San Francisco International Airport, then under the direction of Ray Kelly. The case resulted in the largest verdict at the time under the Federal Tort Claims Act.

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Ms. Weaver is committed to public service through volunteer efforts. She currently serves on the Advisory Council of the East Bay Community Law Center, as well as the Executive Committee of the Securities Section for the Bar Association of San Francisco. She is a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past Co-Chair of the San Francisco LGBT Community Center, past National Chair of the National Center for Lesbian Rights, and past Vice President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club.

Ms. Weaver holds degrees from the University of Bonn (Germany) and Harvard College, and received a J.D. from the University of Virginia Law School (1997). She attended high school at Haderslev Katedraleskole in Denmark. She speaks German and Danish.

Ms. Weaver is admitted to practice in California (1997), the U.S. Court of Appeals for the Ninth Circuit (1998), the U.S. District Court for the Northern District of California (1997), and the U.S. District Court for the Eastern, Central, and Southern Districts of California (1998).

MATTHEW WEILER *Associate*	**Oakland**	• **Email: mweiler@bfalaw.com** • **Tel: +1 415 445 4011** • **www.bfalaw.com/matthew-weiler**

Matthew Weiler has more than a dozen years of experience litigating complex matters in both federal and California state courts, and focuses his practice on complex commercial litigation, including antitrust, consumer, and securities actions. He has been selected as a “Super Lawyer” and named a “Rising Star” in Northern California by Thomson Reuters.

Mr. Weiler primarily prosecutes antitrust actions at present, representing individuals, companies, and investors who have been harmed by fraud and unfair business practices. He currently is litigating claims against German car manufacturers, the self-named Fünfer-Kreise (Circle of Five), alleging the largest known single automobile cartel in U.S. and European history.

Prior to joining BFA, Mr. Weiler was an integral member of the team that collected $399 million in settlements for California purchasers of the drug Cipro, one of the largest cash settlements ever achieved under California antitrust law. Mr. Weiler also helped obtain settlements on behalf of direct purchasers of capacitors from members of an international price-fixing cartel, and previously pursued monopolization claims against the United Fighting Championship. Mr. Weiler additionally has experience with Foreign Sovereign Immunity Act litigation.

Mr. Weiler earned a B.A. from the University of Michigan, where he was a James B. Angell Scholar, and a J.D., *cum laude*, from the University of Michigan Law School (2004). He is admitted to practice in California (2005), the U.S. Court of Appeals for the Ninth Circuit (2013), and the U.S. District Courts for the Northern, Eastern, Central, and Southern Districts of California (2005).

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EMILY ALDRIDGE *Associate*	**Oakland**	• **Email: ealdridge@bfalaw.com** • **Tel: +1 415 445 4013** • **www.bfalaw.com/emily-aldridge**

Emily Aldridge is a skilled litigator with nearly six years of experience in all aspects of complex litigation and investigations, from case intake through trial and settlement.

Ms. Aldridge is responsible for client counseling; developing case strategy; evaluating claims; coordinating e-discovery; investigating and analyzing facts and evidence; drafting pleadings, briefs, memoranda, and contracts; preparing for and participating in court hearings, witness interviews, depositions, mediation, and arbitration; retaining and supervising expert witnesses; and negotiating settlements.

Prior to joining BFA, Ms. Aldridge was a litigation associate at Gibson, Dunn & Crutcher LLP, where her practice included complex commercial litigation, securities litigation, and defense of compliance and white collar investigations, as well as a wide variety of pro bono matters.

Ms. Aldridge earned a B.A., *magna cum laude, in cursu honorum*, from Fordham University and a J.D. from Fordham University School of Law (2011), where she served as a Notes and Articles Editor of the *Fordham Law Review*. She also completed a judicial clerkship with the Honorable Denny Chin of the U.S. Court of Appeals for the Second Circuit. She is proficient in German.

Ms. Aldridge is admitted to practice in New York (2012), California (2014), and the U.S. District Courts for the Southern and Eastern Districts of New York (2013) and the Northern and Southern Districts of California (2017).

ANNE DAVIS *Associate*	**Oakland**	• **Email: adavis@bfalaw.com** • **Tel: +1 415 445 4016** • **www.bfalaw.com/anne-davis**

Anne Davis has nearly a decade of experience litigating complex matters in both federal and state courts, including the courts of California, Delaware, and Kansas. She focuses her practice on complex investigations and litigation, including antitrust, consumer, and securities matters.

Ms. Davis currently is a member of the BFA team litigating *In re Inductors Antitrust Litigation*, representing a class of purchasers of inductors, a passive electronic component that is a key element of electronic circuits found in smart phones, laptops, computers and other consumer electronic devices; as well as *In re German Automotive Manufacturers Antitrust Litigation*; *In re Packaged Seafood Antitrust Litigation*; and *In re Domestic Airline Travel Antitrust Litigation* teams.

Prior to joining BFA, Ms. Davis served as a Principal Counsel for Sales Practice Enforcement at the Financial Industry Regulatory (FINRA), where she advised examination teams and coordinated and conducted complex investigations of violations of FINRA, U.S. Securities and Exchange Commission (SEC), and Municipal Securities Rulemaking Board (MSRB) rules, and the federal securities laws, including matters involving manipulative trading, anti-money-laundering compliance programs, supervision failures, net capital violations, and broker misconduct.

Before FINRA, she was a senior associate at Morrison & Foerster, LLP, where she specialized in securities litigation and enforcement, complex civil litigation, and internal investigations. She advised companies, board members, and executives in matters involving compliance with the U.S. federal and state securities laws; served as personal counsel to officers, directors, and employees called upon to testify in investigative and private litigation proceedings; and represented companies, board members, and executives in SEC, Exchange, and FINRA matters, securities fraud class actions, shareholder derivative actions, and complex commercial litigation. She also maintained a pro bono practice involving Title IX compliance in California public schools, litigation on behalf of prisoners asserting Section 1983 excessive force claims, and asylum claims.

Ms. Davis began her higher education at Harold Washington College, a City College of Chicago and went on to earn a B.A. with honors from the DePaul University, a M.A. (Political Science) from the University of Michigan (2006), and a J.D. from the University of Michigan Law School (2008). She is admitted to practice in California (2009), and the U.S. District Courts for the Central (2011) and Eastern Districts of California (2014).

JAVIER BLEICHMAR *Partner*	**New York**	• **Email: jbleichmar@bfalaw.com** • **Tel: +1 212 789 1341** • **www.bfalaw.com/javier-bleichmar**

Javier Bleichmar leads BFA's U.S. Case Evaluation and U.S. Securities Litigation teams. He brings a long career of litigation success to his prosecution of large-scale fraud class actions on behalf of investors. Mr. Bleichmar has nearly two decades of experience and has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Bleichmar was the lead attorney on the team that litigated *In re MF Global Holdings Ltd. Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors, in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained the complaint in its entirety, and the plaintiffs secured several settlements totaling more than $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Mr. Bleichmar similarly led the team that prosecuted *In re Weatherford International Securities Litigation* on behalf of the Anchorage Police & Fire Retirement System and Weatherford investors. The case alleged that Weatherford, which made three restatements of its audited financial statements totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the plaintiffs secured a $120 million settlement.

In addition to driving daily litigation, Mr. Bleichmar is a successful appellate advocate. After Mr. Bleichmar argued before the Eighth Circuit in *Public Pension Fund Group v. KV Pharmaceutical, Co.*, the Eighth Circuit reversed an earlier dismissal and clarified the standard governing pharmaceutical companies' disclosures relating to notifications by the Food and Drug Administration.

Mr. Bleichmar is active in educating investors on developing trends in the law, particularly the ability of global investors to participate in securities matters outside the United States. Through these efforts, many of his clients were able to join the organization representing investors in the first ever securities class

action settlement, under then-recently enacted Dutch law, against Royal Dutch Shell. He also provides thought leadership as a regular contributor on securities law issues in the *New York Law Journal*. He most recently co-authored "*IndyMac* Leaves Uncertain Landscape for Opt-Out Litigation" and "The Evolving Legacy of *Fait v. Regions Financial*."

Prior to founding the Firm, Mr. Bleichmar was a Partner of Labaton Sucharow LLP. He previously practiced at Bernstein Litowitz Berger & Grossmann LLP, where he was actively involved in *In re Williams Securities Litigation*, which resulted in a $311 million settlement for investors, as well as significant securities matters involving Lucent Technologies, Inc.; Conseco, Inc.; and Biovail Corp. Mr. Bleichmar began his legal career at Kirkland & Ellis LLP. He also is an active member of the National Association of Public Pension Attorneys (NAPPA).

Mr. Bleichmar earned a B.A. from the University of Pennsylvania and a J.D. from Columbia University School of Law (1998), where he was a Harlan Fiske Stone Scholar. During law school, he served as an intern to the Honorable Denny Chin, U.S. District Court Judge for the Southern District of New York. Mr. Bleichmar is a native Spanish speaker and fluent in French.

Mr. Bleichmar is admitted to practice in New York (1998), the U.S. Supreme Court (2010), and the U.S. Courts of Appeals for the Second Circuit (2010), Eight Circuit (2010), Ninth Circuit (2010), Tenth Circuit (2013), and Eleventh Circuit (2011). He is also admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (1999).

JOSEPH A. FONTI *Partner*	**New York**	• **Email: jfonti@bfalaw.com** • **Tel: +1 212 789 1342** • **www.bfalaw.com/joseph-fonti**

Joseph A. Fonti leads the Firm's U.S. Securities Litigation and Claims Filing teams. He has nearly twenty years of experience in prosecuting complex litigations on behalf of institutional investors. His commitment to clients, advocacy skills, and litigation results have earned him recognition as a *Law360* "Rising Star." He also has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Fonti served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation*, in the notoriously fast-paced jurisdiction of the Eastern District of Virginia, known as the "rocket docket." In defeating the defendants' motion to dismiss, he secured one of the first opinions favorable for investors following the Supreme Court's recent decision in the *Omnicare* matter. Mr. Fonti led the litigation to a remarkable recovery for the class, securing a settlement of $219 million, the largest ever securities class action recovery in Virginia.

Mr. Fonti previously achieved notable success in the Eastern District of Virginia as the lead lawyer in a fraud litigation on behalf of Computer Science Corp. shareholders. After prevailing at class certification, and only four weeks before trial, Mr. Fonti and his team secured a $97.5 million settlement—at the time, the second largest cash securities settlement in that court's history.

Mr. Fonti's career also is marked by significant successes in the area of auditor liability and stock options backdating. While representing investors in a class action against HealthSouth Corp., which settled for $671 million, Mr. Fonti played a significant role in recovering $109 million from outside auditor Ernst & Young LLP—one of the largest ever recoveries against an auditing firm. He also contributed to securing a

$173.5 million settlement in a class action against Broadcom Corp. relating to options backdating—at the time the second-largest cash settlement in such a case. That also was the only such case in which claims against the auditors were sustained.

Mr. Fonti has achieved notable success as an appellate advocate. His argument in *In re Celestica Inc. Securities Litigation* resulted in the Second Circuit's reversal of an earlier dismissal, turning the tide of then-recent decisions by realigning pleading standards in favor of investors. He also was instrumental in the advocacy before the Ninth Circuit in *In re Broadcom Corp. Securities Litigation*, where the appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.

Mr. Fonti represents several of Canada's largest pension systems and asset managers. He led the prosecution of securities class action against NovaGold Resources Inc., which resulted in the largest class settlement under Canada's securities laws at the time. He also provides thought leadership on issues particularly relevant to these clients. For example, he recently co-authored "Cross-Listed Securities Cases Present Challenges" in the *National Law Journal*, addressing interpretations of the Supreme Court's *Morrison* decision in light of modern financial markets.

Prior to founding the Firm, Mr. Fonti was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation and in multifaceted SEC investigations and trials. He also is a member of the National Association of Public Pension Attorneys (NAPPA).

Mr. Fonti earned a B.A., *cum laude*, from New York University and a J.D. from New York University School of Law (1999), where he was a member of the Marden Moot Court. He is admitted to practice in New York (2000), the U.S. Supreme Court (2007), and the U.S. Courts of Appeals for the Second Circuit (2010), Ninth Circuit (2007), and Tenth Circuit (2013). He also is admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (2001).

DOMINIC J. AULD *Partner*	**Toronto**	• **Email: dauld@bfalaw.com** • **Tel: +1 212 789 1344** • **www.bfalaw.com/dominic-auld**

Dominic J. Auld leads BFA's Non-U.S. Litigation team. He has more than a decade of experience in representing and advising institutional clients in large-scale securities and investment-related lawsuits. Mr. Auld has been named a "Super Lawyer" in the field of securities litigation by *Super Lawyer* awards and has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Auld is responsible for BFA's outreach to pension systems, asset managers, and sovereign wealth funds outside the United States—regularly advising clients in Europe, Australia, Asia, and across his home country of Canada.

Mr. Auld and his team have served as liaison counsel to global investors in many shareholder and investor litigations outside the United States, including class and collective actions against Olympus Corp. (Japan); OZ Minerals Ltd. (Australia); Fortis (Belgium and the Netherlands); Vivendi Universal (France); and Volkswagen AG (Germany).

Mr. Auld is sought after as a commentator on topics such as corporate governance, shareholder activism, fiduciary duty, corporate misconduct, and international class and collective litigation. He has been a regular speaker and panelist at law and investment conferences, including past events such as the Canadian Foundation for Advancement of Investor Rights (FAIR Canada) and Osgoode Hall Law School conference on public and private securities enforcement and investor recovery in Toronto, the IMF Bentham shareholder class action conference in Sydney, and the Annual International Bar Association meeting in Dubai.

Mr. Auld is the author of various articles of interest to the Firm's client base, including a recent analysis of shareholder remedies in Japan in *Law360*, and a piece regarding custodian bank fees and their impact on pension funds globally in *Nordic Regions Pensions and Investment News* magazine. He is quoted frequently in publications including *The Economist*, *The Financial Times*, *The New York Times*, *USA Today*, *The Times of London*, *The Evening Standard*, *The Guardian*, and *The Daily Mail*, and trade publications such as *Global Pensions*, *OP Risk and Regulation*, *The Lawyer*, *Investments and Pensions Europe*, *Professional Pensions*, and *Benefits Canada*. He also was interviewed by *Corporate Counsel* for a feature article on rogue trading.

Prior to founding the Firm, Mr. Auld was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, where he began his career as a member of the team responsible for prosecuting the landmark action *In re WorldCom Inc. Securities Litigation*, which resulted in a settlement of more than $6 billion.

Mr. Auld has years of experience working directly with institutional clients affected by securities fraud. For example, he worked extensively with the Ontario Teachers' Pension Plan Board as it led securities actions *In re Nortel Networks Corp. Securities Litigation*, *In re Williams Securities Litigation*, and *In re Biovail Corp. Securities Litigation*—cases that recovered a total of more than $1.7 billion for investors.

Mr. Auld earned a B.A. from Queen's University in Canada and a J.D. from Lewis and Clark Law School (1998). He is admitted to practice in New York (1998), and in the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

WILSON MEEKS, III *Partner*	**New York**	• **Email: wmeeks@bfalaw.com** • **Tel: +1 212 789 1346** • **www.bfalaw.com/wilson-meeks**

Wilson Meeks, III is a key member of BFA's U.S. Case Evaluation and U.S. Securities Litigation teams. Mr. Meeks has nearly a decade of knowledge and experience in U.S. securities law and he currently concentrates his practice on prosecuting complex fraud claims on behalf of institutional investors.

Mr. Meeks played a significant role prosecuting *In re Genworth Financial Inc. Securities Litigation*, on behalf of Her Majesty the Queen in Right of Alberta and Genworth investors, in the notoriously fast-paced jurisdiction of the Eastern District of Virginia, known as the "rocket docket." The case alleged that Genworth, the largest seller of long-term care insurance in the United States, misled investors about the true state of the company's deteriorating long-term care business. Mr. Meeks spearheaded the Firm's prosecution and discovery efforts, helping to secure a $219 million settlement for investors—the largest ever securities class action recovery in Virginia.

He similarly played a key role in prosecuting *In re Weatherford International Securities Litigation* on behalf of the Anchorage Police & Fire Retirement System and Weatherford investors. The case alleged that Weatherford, which made three restatements of its audited financial statement totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the plaintiffs secured an outstanding recovery of $120 million.

Prior to joining the Firm, Mr. Meeks was an associate at Labaton Sucharow LLP, where he prosecuted financial litigation matters on behalf of institutional investors. He previously worked at Akin Gump Strauss Hauer & Feld LLP, where he focused on complex securities, commercial, and bankruptcy litigation.

Mr. Meeks earned a B.A. from Colgate University and a J.D. from Columbia Law School (2007), where he was a James Kent Scholar and was awarded both the Milton B. Conford Book Prize in Jurisprudence and the Samuel I. Rosenman Prize. He also completed judicial clerkships with the Honorable James Robertson of the U.S. District Court for the District of Columbia and the Honorable Dolores K. Sloviter of the U.S. Court of Appeals for the Third Circuit.

Mr. Meeks is admitted to practice in New York (2007), and the U.S. Courts of Appeals for the Second Circuit (2013), Third Circuit (2010), and Ninth Circuit (2012). He is also admitted in the U.S. District Courts for the District of Columbia (2009), and the Southern and Eastern Districts of New York (2011).

SARA PILDIS SIMNOWITZ *Special Counsel*	**New York**	• **Email: ssimnowitz@bfalaw.com** • **Tel: +1 212 789 2309** • **www.bfalaw.com/sara-simnowitz**

Sara Simnowitz has focused her practice in complex commercial and securities litigation for fifteen years and brings significant trial experience to the Firm.

Sara is a member of the Firm's U.S. Securities Litigation team, and she played a key role in the prosecution of *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. The plaintiffs recovered $219 million—the largest ever class action settlement in Virginia.

Before joining BFA, Sara was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. She previously practiced at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial and securities litigation.

Sara earned a B.A., *summa cum laude*, from Brandeis University, a J.D. from the University of Chicago Law School (2001), and an M.A. from the London School of Economics and Political Science (2002). She is admitted to practice in Massachusetts (2002), New York (2006), the U.S. Supreme Court (2008), the U.S. Court of Appeals for the First Circuit (2003), and the U.S. District Courts for the District of Massachusetts (2002), the Southern and Eastern Districts of New York (2006), and the Western District of New York (2008).

BLEICHMAR FONTI & AULD LLP

KENDRA SCHRAMM *Of Counsel*	New York	• Email: kschramm@bfalaw.com • Tel: +1 212 789 1358 • www.bfalaw.com/kendra-schramm

Kendra Schramm is a highly valued litigator with more than six years of experience prosecuting complex securities class actions. Kendra is a key member of the Firm's Non-U.S. Litigation and Claims Filing teams. She also assists the Client Reporting and Data Analysis team in assessing clients' loss exposure in both domestic and international matters.

Kendra acts as liaison counsel to institutional investors in securities and investment-related actions across the globe—including in Australia, Europe, and Japan. She provides highly pragmatic advice to sophisticated clients on the risks of participation in these cases, which often require a formal decision to pursue a claim. She is instrumental to BFA's outreach to institutional clients outside the United States. In addition, Kendra recently co-authored "A Look at Shareholder Remedies in Japan" in *Law360*, commenting on the evolving Japanese litigation regime.

Prior to joining the Firm, Kendra was an associate at Labaton Sucharow LLP, where she was a member of the team that recovered more than $1 billion in total settlements in the landmark securities class action against American International Group and numerous related defendants. She also was instrumental in prosecuting the complex securities litigation against the Federal National Mortgage Association (Fannie Mae), which successfully alleged that investors' losses were caused by the defendants' misstatements and misconduct, rather than the recent financial crisis, and recovered $170 million.

Kendra earned a B.A. from New York University and a J.D. from Brooklyn Law School (2011), where she was an Associate Managing Editor of the *Journal of Law & Policy*. During law school, she served as a law clerk to the Honorable Elizabeth S. Stong, U.S. Bankruptcy Court Judge for the Eastern District of New York. She is admitted to practice in New York (2012), New Jersey (2012), the U.S. Supreme Court (2014), and the U.S. District Courts for the Southern District of New York (2012) and the District of New Jersey (2012).

ERIN H. WOODS *Of Counsel*	New York	• Email: ewoods@bfalaw.com • Tel: +1 212 789 1353 • www.bfalaw.com/erin-woods

Erin Woods leads the Firm's outreach to institutional investors in the United States, advising public pension funds and other entities on securities, antitrust, and consumer litigation. She also is a member of the Firm's U.S. Case Evaluation team.

Erin has more than eight years of experience in securities law and the class action industry. Prior to joining BFA, Erin was a Director of Business Development for the Garden City Group, where she provided both plaintiff and defense counsel comprehensive, accurate, and practical approaches to class action and mass tort settlement administration.

Erin worked with the BFA attorneys as an associate at Labaton Sucharow LLP prior to joining the Garden City Group, litigating securities class actions such as *In re Celestica Inc. Securities Litigation* ($30 million settlement); *In re NovaGold Resources Inc. Securities Litigation* ($26.6 million cross-border settlement)—

at the time the largest ever class recovery under Canada's securities laws; and two related cases against OppenheimerFunds ($100 million settlement).

Erin earned a B.A. from Villanova University and a J.D. from Brooklyn Law School (2008). She is admitted to practice in New York (2009), the U.S. Courts of Appeals for the Ninth Circuit (2010) and Second Circuit (2011), and the U.S. District Court for the Southern District of New York (2009). She also is a member of the National Association of Public Pension Attorneys (NAPPA), the American Bar Association, the New York State Bar Association.

WILLIAM GERACI *Associate*	**New York**	• **Email: wgeraci@bfalaw.com** • **Tel: +1 212 789 1349** • **www.bfalaw.com/william-geraci**

William Geraci is a member of the Firm's U.S. Case Evaluation and U.S. Securities Litigation teams. Mr. Geraci has more than a decade of experience in complex litigation and is deeply familiar with all key aspects of securities class actions, including large-scale discovery efforts, evidentiary briefing, discovery disputes, dispositive motions, the use of expert testimony, and mediation proceedings.

Mr. Geraci was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered $219 million for investors—the largest ever class action settlement in Virginia.

He also was a member of the team that prosecuted *Weatherford International*. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and the production of eight million pages of documents, the plaintiffs secured a recovery of $120 million.

Prior to joining the Firm, Mr. Geraci worked at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted *In re Bear Stearns Companies, Inc. Securities Litigation* ($294.9 million settlement).

Mr. Geraci received a B.A., *cum laude*, from Hamilton College and a J.D. with honors from George Washington University (2005), where he was an Articles Editor of the *American Intellectual Property Association Quarterly Journal*. He is admitted to practice in New York (2006).

NICHOLAS DENNANY *Associate*	**New York**	• **Email: ndennany@bfalaw.com** • **Tel: +1 212 789 1354** • **www.bfalaw.com/nicholas-dennany**

Nicholas Dennany is a member of the Firm's U.S. Case Evaluation and U.S. Securities Litigation teams. He has more than a decade of litigation experience, with specific expertise in discovery matters and managing large-scale electronic document reviews. Mr. Dennany has been responsible for both the legal and technical aspects of the discovery process, and has routinely overseen production and receipt of electronic discovery in major securities actions.

He was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered $219 million for investors—the largest ever class action settlement in Virginia.

Mr. Dennany was also a key contributor to the Firm's recent success in *MF Global*, in connection with the company's dramatic collapse on October 31, 2011. The plaintiffs secured several settlements totaling more than $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Prior to joining the Firm, Mr. Dennany worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted securities claims *In re Broadcom Corp. Securities Litigation* ($173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* ($26.6 million settlement).

Mr. Dennany earned a B.A., *cum laude*, from the University of Florida and a J.D. from the University of Florida, Levin College of Law (2004). He is admitted to practice in New York (2006).

EXHIBIT B

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

Firm Name: Bleichmar Fonti & Auld LLP **Reporting Period: March 1, 2017 through Present**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Weaver, Lesley (P)											4.70	8.60			13.30	$840.00	$11,172.00
Simnowitz, Sara (OC)												1.30			1.30	$675.00	$877.50
Aldridge, Emily (A)										0.30	2.30	0.30			2.90	$625.00	$1,812.50
Samra, Joshua (A)								5.40			7.50				12.90	$535.00	$6,901.50
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**5.40**	**0.00**	**0.30**	**14.50**	**10.20**	**0.00**	**0.00**	**30.40**		**$20,763.50**
NON-ATTORNEYS																	
Hensley, Kelsey (PL)												6.60			6.60	$350.00	$2,310.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.60**	**0.00**	**0.00**	**6.60**		**$2,310.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**5.40**	**0.00**	**0.30**	**14.50**	**16.80**	**0.00**	**0.00**	**37.00**		**$23,073.50**

EXHIBIT C

Date	Item	Timekeeper	Duration	Description
4/12/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Review and analyze Judge Gonazalez's order denying class certification without prejudice
4/12/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.4	identify key elements of Judge Gozalez's order denying clas cert. without prejudice [redacted];
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.2	develop proposed strategy with L. Renne and S. Cikes re: [redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.1	Coordinate with team re: [redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.2	Confer with L. Renne and S. Cikes re: th[redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.1	Review letter from co-lead counsel re: [redacted]
4/18/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Coordinate with S. Cikes and L. Renne re: [redacted];
4/18/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.4	Confer with clients re: [redacted];
4/26/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Confer with B. Glackin re: [redacted];
5/24/2017	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with client regarding [redacted] and confer with lead counsel re [redacted]
12/7/2017	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	1.5	Research and draft summary of case status to inform client of [redacted].
12/8/2017	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	0.3	Research [redacted] to inform client.
12/11/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.5	Review and revise update re: [redacted]; send to Louise Renne, Steven Cikes to update clients re: [redacted]
12/11/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	1	Review and revise update re: [redacted]; send to Louise Renne and Steve Cellars to update clients re: [redacted]
3/5/2018	(10) Class Certification/Experts	Aldridge, Emily	0.3	Analyze class certification opinion for [redacted].
5/3/2018	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	0.5	Draft update for clients to [redacted].
7/5/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Prepare for and confer with Shana Scarlett of Hagens Berman re [redacted].
7/5/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Follow up analysis of proposed settlements.
7/6/2018	(12) Negotiating Settlements	Weaver, Lesley	0.8	Confer re [redacted].
7/6/2018	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with Louise Renne and Steven Cikes re [redacted].
7/9/2018	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.9	Review and revise draft email to clients Palo Alto and Richmond re [redacted].
7/10/2018	(12) Negotiating Settlements	Aldridge, Emily	0.2	Research and identify [redacted] to which clients must [redacted].
7/10/2018	(12) Negotiating Settlements	Aldridge, Emily	0.1	Instruct Kelsey Hensley on [redacted].
7/10/2018	(12) Negotiating Settlements	Hensley, Kelsey	1.2	Draft and revise [redacted] for online [redacted]
7/10/2018	(12) Negotiating Settlements	Simnowitz, Sara	0.5	Attention to claims submissions and potential settlement analysis
7/13/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.7	Begin search for [redacted] and call TSG Reporting re [redacted] in support of drafting clients' claims forms.

7/16/2018	(12) Negotiating Settlements	Hensley, Kelsey	2.3	Work on obtaining [redacted] from TSG Reporting and review [redacted] for purposes of filling out claims forms for Richmond and Palo Alto clients.
7/16/2018	(12) Negotiating Settlements	Simnowitz, Sara	0.8	Attention to analysis of [redacted] and [redacted] filings.
7/16/2018	(12) Negotiating Settlements	Weaver, Lesley	0.5	Prepare for and attend call with Brendan Glackin of Lieff Cabraser re [redacted].
7/19/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Prepare for and attend conference call with Louise Renne re [redacted]; confer with Steven Cikes re [redacted]
7/22/2018	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with lead counsel re [redacted]
7/23/2018	(12) Negotiating Settlements	Weaver, Lesley	0.4	Coordinate call with lead counsel.
7/23/2018	(12) Negotiating Settlements	Hensley, Kelsey	1.8	Attention to settlement claims forms for cities of Richmond and Palo Alto.
7/24/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Confer with Steven Cikes and Louise Rene re [redacted]; confer re [redacted].
7/25/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Prepare for and attend call with S. Scarlett re [redacted].
9/5/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.5	Revise claims forms and send to claims administrator.
10/10/2018	(12) Negotiating Settlements	Weaver, Lesley	0.1	Follow up with claims administrator response to [redacted].
11/13/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.1	Attention to emailing Marc Wall re [redacted].
11/20/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Coordinate with L. Renne, S. Cikes re [redacted].
3/22/2019	(12) Negotiating Settlements	Weaver, Lesley	1.1	Coordinate with Joshua Samra re [redacted]; study [redacted] for Richmond and Palo Alto clients.
3/25/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	3	Conducting legal research regarding [redacted].
3/26/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.2	Conducting legal research regarding [redacted].
3/26/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	2.3	Conducting legal research regarding [redacted].
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	1.8	Drafting declaration in support of incentive awards.
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.2	Drafting declaration in support of incentive awards.
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	1.6	Drafting declaration in support of incentive awards.
3/27/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.8	Conducting legal research regarding [redacted].
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.7	Drafting declaration in support of incentive awards.
3/28/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.2	Conducting legal research regarding [redacted].
3/28/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	1	Conducting legal research regarding [redacted].
3/28/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.3	Drafting declaration in support of [redacted].
4/8/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.8	Drafting declaration in support of [redacted].

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
Bleichmar Fonti & Auld LLP

Reported Expenses Incurred on Behalf of IPPs

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	$ 112.58
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	$ 13.07
Service of Process	
Special Supplies	
Telephone/Telecopier	$ 1.10
Travel	
Miscellaneous	
Total:	$ 126.75

EXHIBIT 6

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF LESLEY E. WEAVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLEICHMAR FONTI AND AULD LLP**

I, Lesley E. Weaver, declare:

1. I am Partner of Bleichmar Fonti and Auld LLP ("BFA"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to City of Palo Alto and City of Richmond and as counsel for IPPs throughout the course of this litigation. The background and experience of BFA and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, BFA performed the following work: Settlement related research and conferring with leadership and clients regarding settlement negotiations and obtaining approvals.

5. Attached hereto as **Exhibit B** is a billing summary of BFA's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by BFA. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by BFA and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Lesley E. Weaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of BFA and filed on May 26, 2017. (ECF No. 1813-6). Counsel for Plaintiffs

did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by BFA since June 1, 2013 was 38.9, with a corresponding lodestar of $24,593.5 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses BFA has incurred from June 1, 2013 to present, plus applicable case filing fees. BFA expended a total of $126.75 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by BFA on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by BFA in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Oakland, CA.

/s/ Lesley E. Weaver

Lesley E. Weaver

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

BLEICHMAR
FONTI & AULD LLP



BLEICHMAR FONTI & AULD LLP

OVERVIEW

Bleichmar Fonti & Auld LLP ("BFA" or the "Firm") is a boutique law firm founded in 2014 with offices in New York City, Oakland, California, and Toronto, Canada. The Firm's strength is in plaintiff-side complex litigation, including the prosecution of antitrust, consumer, and securities actions on behalf of consumers, governmental entities, and institutional investors.

Since 2014, BFA has recovered over $17.6 billion for its clients. This remarkable accomplishment is due in part to the extensive experience of the Firm's partners in the last two decades prosecuting complex class actions. Indeed, while BFA is relatively new, our collective experience rivals that of older peer firms, as evidenced by our recognition as a top-ten firm measured by amount recovered in securities litigation in 2015 (ISS Securities Class Action Services' Top 50 Report for 2015) and a top 15 firm in 2016 (ISS Securities Class Action Services' Top 50 Report for 2016).

Since adding its consumer and antitrust practice in mid-2016, BFA has been appointed to lead two of the more significant antitrust/consumer cases, in addition to the Firm's leadership role in *In re Volkswagen "Clean Diesel" Litigation*, MDL No. 2672, which resulted in the largest automotive settlement in history. Most recently, the Firm was appointed to the Steering Committee of *In re German Autos Antitrust Litigation*.

Our attorneys are nationally recognized as leading litigators in the field of securities litigation, and our achievements have been profiled in a variety of national and international media, including *The Wall Street Journal*, *The New York Times*, *Law 360*, Law.com, the *National Law Journal's* Plaintiffs' Hot List, the *Legal 500*, ZDF Today, and Deutsche Welle TV. We are also frequently asked to comment on breaking developments in antitrust, consumer, financial fraud, securities, and other investment-related issues.

The Firm's clients include some of the largest pension funds in North America, as well as leading businesses and banking institutions.

BLEICHMAR FONTI & AULD LLP

APPOINTMENTS AND REPRESENTATION

In re Inductors Antitrust Litigation

- N.D. Cal. No. 18-cv-00198
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: Plaintiffs allege that Defendants, leading Japanese manufacturers of inductors such as Murata and Panasonic Corp., colluded to fix, inflate, or stabilize the price of inductors from at least 2003 until the summer of 2014, in violation of Section 1 of the Sherman Antitrust Act. Inductors are electronic components that work to regulate and store energy in a circuit and are found in thousands of products that rely on electronic circuits for power, such as computers, cars, and televisions.

BFA's Role: Judge Edward J. Davila appointed BFA as Co-Lead Class Counsel, noting that "the efforts expended by BFA and Hausfeld to promptly identify and investigate the claims, coupled with the extensive amount of resources which they have available to expend on this case, renders them superior to represent the putative class."

In re German Automotive Manufacturers Antitrust Litigation

- MDL No. 2796
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: BFA was one of the first law firms to file suit against German automobile manufacturers and supplier Bosch, alleging the largest known single automobile cartel in U.S. and European history. The action claims that Audi, BMW, Daimler/Mercedes-Benz, Porsche, and Volkswagen engaged in a 20-year cartel to suppress the development of technology in their automobiles from 1996 until at least 2015, as admitted by Daimler and VW to European regulators. The cartel allowed the car manufacturers to reduce research and development costs amongst themselves, while charging customers premiums for their supposed "quality and innovation" and suppressing alternatives that would have been provided by real competition.

BFA's Role: Judge Charles R. Breyer appointed partner Ms. Weaver from a field of 38 applicants to the Plaintiffs' Steering Committee.

In re Disposable Contact Lens Antitrust Litigation

- MDL No. 2626
- Lead BFA Attorney: Lesley Weaver

Case Status: Pending

Background: Plaintiffs allege claims for horizontal and vertical conspiracies in violation of state and federal antitrust laws due to unilateral pricing policies of four leading contact lens manufacturers. Plaintiffs have settled with Defendant CooperVision, Inc. for $3 million.

BFA's Role: BFA is leading discovery efforts against the largest manufacturer.

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In re Domestic Airlines Travel Antitrust Litigation	**Case Status: Pending**
• District of Columbia, No. 1:15-mc-01404 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege a conspiracy by the four largest commercial air passenger carriers in the United States—American Airlines, Inc., Delta Airlines, Inc., Southwest Airlines Co., and United Airlines, Inc.—to fix prices for domestic air passenger transportation services in violation of the Sherman Act by colluding to limit capacity on their respective airlines. Plaintiffs have settled for $15 million with Defendant Southwest Airlines and $45 million with Defendant American Airlines.

BFA's Role: BFA is a key part of Plaintiffs' nonparty discovery committee and has led meet and confer negotiations with dozens of nonparties, resulting in the production of some of Plaintiffs' best evidence.

In re Blood Plasma Antitrust Litigation	**Total Settlements: $128 Million**
• MDL No. 2109 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that Defendants participated in a multi-year conspiracy to restrict output and fix prices of Ig and albumin in the United States.

BFA's Role: Ms. Weaver played a significant role, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants.

In re Lithium Ion Batteries Antitrust Litigation	**Total Settlements: $64.5 Million**
• MDL No. 2420 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants and their co-conspirators engaged in an unlawful conspiracy to fix the prices of lithium ion battery cells, affecting the prices indirect purchasers paid for lithium ion batteries and lithium ion products. Indirect Purchaser Plaintiffs have settled their claims for $19.5 million from Sony Corp., $39 million from LG Chem Ltd., $3.45 million from Hitachi Maxwell Ltd., and $2.5 million from NEX Corp.

BFA's Role: BFA acts as counsel for the cities of Palo Alto and Richmond, California.

Result: On October 27, 2017, the Court gave final approval to the settlement between the IPPs and Hitachi Maxell, NEC Corporation, and LG Chem. The settlement is worth $45 million, bringing the total settlements with IPPs to $64.5 million.

In re Automotive Parts Antitrust Litigation	**Total Settlements: $604 Million**
• MDL No. 2311 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs alleged that a group of auto parts makers violated antitrust laws by engaging in bid-rigging and price-fixing.

BFA's Role: In the case against manufacturers of wire harnesses, BFA represented Oakland County, Michigan, Traverse City, Michigan, the Village of Northport, New York, Mecklenburg County, North Carolina, and Richmond, California.

Result: BFA's clients settled on a non-class basis far in excess of the entities' actual damages. BFA took no fees related to that settlement.

In re LIBOR-Based Financial Instruments Antitrust Litigation	**Case Status: Pending**
• MDL No. 2262 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants' manipulation of U.S. Dollar LIBOR allowed them to pay unduly low interest rates to purchasers of U.S. Dollar LIBOR-based financial instruments, allowing defendants to reap hundreds of millions, if not billions, of dollars in ill-gotten gains. Plaintiffs have secured settlements of $120 million from Barclays Bank PLC, $130 million from Citigroup Inc., $240 million from Deutsche Bank AG, and $100 million from HSBC, for a total of $590 million.

BFA's Role: BFA joined the case to represent Community Bank & Trust and now also serves as allocation counsel in the matter.

In re Liquid Aluminum Sulfate Antitrust Litigation	**Case Status: Pending**
• MDL No. 2262 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege that defendants entered into an unlawful conspiracy involving bid rigging, market allocation, and price fixing to eliminate competition in the liquid aluminum sulfate market.

BFA's Role: BFA represents Oakland County, Michigan.

In re Packaged Seafood Products Antitrust Litigation	**Case Status: Pending**
• MDL No. 2670 • Lead BFA Attorney: Lesley Weaver	

Background: Plaintiffs allege defendants entered into a conspiracy involving packaged seafood product in violation of the Sherman Act and state antitrust law.

BFA's Role: BFA is part of a critical discovery effort against a key defendant.

In re Facebook, Inc. Consumer Privacy User Profile Litigation	**Case Status: Pending**
• MDL No. 2843 • Lead BFA Attorney: Lesley Weaver	

Background: The litigation consolidates more than 30 cases filed around the country alleging that Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' personally identifiable information without their knowledge or consent.

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BFA's Role: Judge Chhabria of the Northern District of California appointed Ms. Weaver as Co-Lead Counsel for Plaintiffs.

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation • MDL No. 2672 • Lead BFA Attorney: Lesley Weaver	**Total Settlements: $17 Billion**

Background: The case involves claims against Volkswagen, Audi and Porsche in connection with the widely-reported news that the companies had installed emission systems created to avoid regulator detection and defraud customers who believed they were buying Volkswagen and Audi vehicles with "clean diesel" engines. VW admitted that it installed these "defeat devices," which eliminated the emissions reduction during normal driving, and only allowed for reduced fuel emissions when the automobiles were being tested. More than 500 federal lawsuits have been filed and consolidated into one complaint against the automaker for its "dirty diesel" vehicles.

BFA's Role: Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee, which, along with lead counsel, has been described as the "dream team" prosecuting this high-profile emissions scandal. Judge Breyer selected Ms. Weaver from a field of 150 of the nation's finest attorneys. Ms. Weaver's leadership position in the case included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH's significant role in multiple schemes to place software in vehicles purposefully designed to evade emissions laws.

Result: Lead Counsel and the Plaintiffs' Steering Committee have achieved settlements for Plaintiffs worth a total of $17 billion, the largest automotive class action recovery in history. This includes a $14.7 billion dollar settlement on behalf of eligible owners of Volkswagen and Audi 2.0-liter TDI cars, who were offered a buyback of their cars. In accordance with the consent decree, $2.7 billion of the settlement will be allocated to projects to reduce nitrogen oxides emissions, with a focus on improving air quality in areas that "bear a disproportionate share of the air pollution burden within their jurisdiction." As the Justice Department's top environmental attorney John Cruden has highlighted, this focus on remediation in low income and minority communities is "unique," and a significant response to the disproportionate pollution burden felt by these communities.

In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices and Products Liability • MDL No. 2777 • Lead BFA Attorney: Lesley Weaver	**Case Status: Pending**

Background: The class alleges that Fiat Chrysler Automobiles deliberately cheated on emission testing of 2014-2016 model Dodge and Jeep trucks marketed and sold as environmentally friendly "eco-diesel" vehicles.

BFA's Role: Judge Edward Chen of the U.S. District Court for the Northern District of California appointed Ms. Weaver as one of nine members of the Plaintiffs' Steering Committee.

In re Twitter Inc. Securities Litigation • Northern District of California, No. 3:16-CV-05314 • Lead BFA Attorney: Lesley Weaver	**Case Status: Pending**

Background: Investors allege that Twitter executives omitted key metrics about daily active users ("DAU")—the type of users who actually drive advertising revenues for the company. In October 2017, Judge Jon Tigar denied Twitter's motion to dismiss. The judge held that "a strong inference arises [Twitter] knowingly misled the public [about] what was really happening with user engagement at Twitter," and that "[i]n the absence of DAU data, investors interpreted defendants' statements as reassurances that the Company had experienced and would continue to experience positive growth and engagement trends." Twitter's motion to dismiss also sought to excuse ex-CEO Dick Costolo and current COO and CFO Anthony Noto from the case, but Judge Tigar found that both men made misleading statements on earnings calls and in interviews.

BFA's Role: On December 22, 2016, Judge Tigar appointed BFA as liaison counsel to the class.

Ontario Teachers' Pension Plan Board, et al v. Teva Pharmaceutical Industries Ltd. et al. • District of Connecticut, No. 17-cv-00558 • Clients: Ontario Teachers' Pension Plan Board and Anchorage Police and Fire Retirement System • Lead BFA Attorneys: Joseph Fonti, Wilson Meeks, III	**Case Status: Pending**

Background: Plaintiffs allege that the company and its senior management made materially false and misleading statements that concealed the fact that Teva was conspiring with other drug manufacturers to fix drug prices, in violation of United States antitrust law.

BFA's Role: BFA is sole Lead Counsel for Court-appointed Lead Plaintiff Ontario Teachers' and named plaintiff Anchorage Police and Fire Retirement System.

In re MF Global Holdings Ltd. Securities Litigation • Southern District of New York, No. 11-cv-07866 • Client: Alberta Investment Management Corp. (AIMCo) • Lead BFA Attorneys: Javier Bleichmar, Dominic Auld	**Total Settlements: $234.3 Million**

Background: This litigation arose from MF Global's dramatic bankruptcy in October 2011. Plaintiffs alleged that Defendants misrepresented the company's risk controls, liquidity position, and exposure to European sovereign debt, and failed to properly account for its deferred tax assets.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo.

Result: Lead Counsel achieved five partial settlements worth a total of just over $234 million on behalf of investors: (1) a $74 million settlement with Goldman Sachs and certain other underwriters of the company's securities; (2) a $64.5 million settlement with former officers and directors, including MF Global's former CEO Jon Corzine; (3) a $65 million settlement with auditor PricewaterhouseCoopers; (4) a $29.825 million settlement with Jefferies and other underwriters of the final bond offering issued during

the Class Period; and (5) a separate $932,828 settlement with another underwriter defendant associated with that last offering. These settlements represent a recovery of approximately 35% of the alleged damages—an excellent result, particularly in light of the issuer's bankruptcy.

These settlements were achieved after years of hard fought litigation. Following the Court's ruling sustaining the Complaint and denying Defendants' six motions to dismiss in their entirety, Co-Lead Counsel reviewed millions of documents produced by Defendants and third-parties, and conducted more than 50 depositions of former employees of MF Global and other key witnesses, including four days of testimony from former CEO Jon Corzine. The Court granted Plaintiffs' motion for class certification on October 14, 2015, which assisted in achieving the settlements.

In re Genworth Financial Inc. Securities Litigation

- Eastern District of Virginia, No. 14-cv-00682
- Client: Alberta Investment Management Corp. (AIMCo)
- Lead BFA Attorneys: Joseph Fonti, Wilson Meeks, III

Total Settlement: $219 Million

Background: Plaintiffs alleged that Defendants misrepresented the profitability of the company's core business and reported false financial results by grossly understating long-term care insurance reserves. When Genworth announced a $531 million charge to its reserves, the company's stock price fell more than 55%—wiping out billions in market capitalization—and credit rating agencies downgraded the company and its corresponding debt to "junk" status.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff AIMCo. On March 10, 2016, Genworth announced a proposed settlement of $219 million, the largest ever securities class action recovery achieved in Virginia, and as much as 44% of recoverable damages available at trial. BFA and AIMCo sought and achieved a significant contribution from the company beyond available insurance; despite significant liquidity issues, the company paid $69 million, and the remaining $150 million was funded by insurance.

Result: The settlement was reached after 15 months of intense and complex litigation. The Eastern District of Virginia is known as the "rocket docket" for its rapid disposition of cases and strict adherence to scheduled deadlines. In December 2014, Lead Plaintiffs filed a consolidated complaint and, in February 2015, Defendants filed a motion to dismiss. Partner Joseph Fonti successfully argued against the motion on April 28, 2015, and the securities fraud claims were sustained on May 1, 2015. Lead Plaintiffs filed their motion for class certification on December 3, 2015; fact discovery closed on January 15, 2016; and expert discovery closed on February 11, 2016. In effect, BFA conducted two to four years of litigation in just 15 months. This effort included more than 20 depositions, extensive trial preparation, and full briefing on motions for class certification and summary judgment.

In re Weatherford International Securities Litigation

- Southern District of New York, No. 12-cv-02121
- Client: Anchorage Police and Fire Retirement System
- Lead BFA Attorneys: Javier Bleichmar, Wilson Meeks, III

Total Settlement: $120 Million

Background: Plaintiffs alleged that Weatherford, one of the world's largest oil and gas servicing companies, issued false financial statements that misled investors about its tax structure and internal

controls. The company allegedly overstated its earnings by more than $900 million and was forced to issue three restatements due to its failure to comply with Generally Accepted Accounting Principles.

BFA's Role: BFA represented Court-appointed Co-Lead Plaintiff Anchorage.

Result: In June 2015, Weatherford agreed to settle all claims for $120 million of out-of-pocket cash, with no available insurance, or approximately 30% of recoverable damages. Achieving this settlement required more than three years of intense litigation, including defeating Defendants' motion to dismiss in its entirety; obtaining class certification; completing fact discovery, after more than 20 depositions and the review of more than eight million pages of documents; filing four expert reports; and preparing for expert discovery and summary judgment.

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TEAM PROFILES

LESLEY E. WEAVER *Partner*	**Oakland**	• **Email: lweaver@bfalaw.com** • **Tel: +1 415 445 4004** • **www.bfalaw.com/lesley-weaver**

Lesley E. Weaver is the Partner in Charge of Bleichmar Fonti & Auld LLP's California office, and the practice head of its Antitrust and Consumer team. In her twenty-year career, Ms. Weaver has focused primarily on cases that protect the public interest, consumers, and public entities. She has substantial leadership experience litigating complex antitrust and consumer-oriented class litigation, and has been appointed to leadership positions in some of the largest class actions in the country. Ms. Weaver has been named a "Super Lawyer" in the field of as Class Action & Mass Torts Attorneys.

On April 27, 2018, Judge Edward J. Davila appointed Ms. Weaver as interim Co-Lead Counsel in *In re Inductors Antitrust Litigation*, representing a class of purchasers of inductors, a passive electronic component that is a key element of electronic circuits found in smart phones, laptops, computers, and other consumer electronic devices.

In December 2017, Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re German Automotive Manufacturers Antitrust Litigation*. Consumers and suppliers allege that German automakers engaged in a 20-year cartel—the single largest known automobile cartel in U.S. and European history—to suppress the development of technology in their automobiles.

Ms. Weaver is leading the discovery committee against the defendant with the largest exposure in *In re Disposable Contact Lens Antitrust Litigation*, and is also working with the discovery team in *In re Packaged Seafood Antitrust Litigation*. Ms. Weaver has significant responsibility in *In re Domestic Airline Travel Antitrust Litigation*, including managing discovery concerning third parties through which substantial collusion allegedly took place. Ms. Weaver played a significant role in *In re Blood Plasma Antitrust Litigation*, including deposing the Chief Operating Officer and Chief Marketing Officer of one of the main defendants. The case ultimately settled for $128 million.

She represents the Cities of Palo Alto and Richmond, California in a municipal subclass in *In re Lithium Ion Batteries Antitrust Litigation*. In *In re Automotive Parts Antitrust Litigation*, Ms. Weaver represented Oakland County, Michigan; Traverse City, Michigan; the Village of Northport, New York; Mecklenburg County, North Carolina; and Richmond, California in the case against manufacturers of wire harnesses that settled on a non-class basis far in excess of the entities' actual damages.

In July 2018, Judge Chhabria of the Northern District of California appointed Lesley as co-lead counsel for plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*. The litigation consolidates more than 30 cases filed around the country alleging that Facebook violated consumer fraud and privacy laws in allowing hundreds of third party apps, including Cambridge Analytica, to bundle and sell Facebook users' personally identifiable information without their knowledge or consent.

In June 2017, Judge Edward M. Chen appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re Chrysler-Dodge-Jeep EcoDiesel Marketing, Sales Practices, and Products Liability Litigation*. Ms. Weaver is

working closely with technical experts in that matter to determine if proposed fixes to the subject vehicles inflict additional damages upon class members.

In 2015, Judge Charles R. Breyer appointed Ms. Weaver to the Plaintiffs' Steering Committee in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*. Ms. Weaver's leadership position in the *Volkswagen* litigation included spearheading the investigation that ultimately uncovered German auto supplier Robert Bosch GmbH's significant role in multiple schemes to place software in vehicles purposely designed to evade emissions laws. Plaintiffs in the Volkswagen litigation have recovered more than $15 billion for class members and nearly $5 billion for the environment, the largest automotive class action recovery ever.

Ms. Weaver has personally managed complex litigation on an enormous scale. In *In re Marsh & McLennan Cos., Inc. Securities Litigation*, as part of her day-to-day oversight of the case, she managed a document review team of 30 contract lawyers and a team of associates, who reviewed 50 million documents over the course of a year. More than 50 depositions were taken in the case.

In addition, Ms. Weaver has extensive experience representing sophisticated institutional investors in landmark securities actions. Some of those cases include *In re Cavanaugh Securities Litigation* (including an appeal to the Ninth Circuit concerning the method of selecting lead plaintiff and lead counsel after the enactment of the Private Securities Litigation Reform Act ("PSLRA")); *Marsh & McLennan* ($400 million settlement); *In re Cardinal Health Inc. Securities Litigation* ($600 million settlement); and *In re Cisco Systems, Inc. Securities Litigation* ($99 million settlement). Earlier, in the years following the passage of the PSLRA, Ms. Weaver litigated and won significant issues as the law was being developed and established. *See In re Northpoint Communications Group, Inc.* (holding that certain allegations of scienter and falsity in securities suit were pled with particularity as required by the PSLRA); *In re Commtouch Software, Ltd. Securities Litigation* (finding complaint was pled with sufficient particularity to support an inference of deliberate misconduct). Those matters ultimately settled for $20 million and $15 million, respectively.

Ms. Weaver's trial experience has spanned her career. In October 2014, Ms. Weaver tried an internet privacy case against a Chinese-owned, California-based internet site, delivering opening and closing statements. Plaintiffs recovered 100% of economic damages and won a $15 million punitive damages jury verdict, as well as significant injunctive relief. Her first trial was in 1998 before the Honorable Vaughn Walker against U.S. Customs on behalf of Amanda Buritica, a U.S. citizen born in Colombia who was unlawfully detained by U.S. Customs at San Francisco International Airport, then under the direction of Ray Kelly. The case resulted in the largest verdict at the time under the Federal Tort Claims Act.

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Ms. Weaver is committed to public service through volunteer efforts. She currently serves on the Advisory Council of the East Bay Community Law Center, as well as the Executive Committee of the Securities Section for the Bar Association of San Francisco. She is a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past Co-Chair of the San Francisco LGBT Community Center, past National Chair of the National Center for Lesbian Rights, and past Vice President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club.

Ms. Weaver holds degrees from the University of Bonn (Germany) and Harvard College, and received a J.D. from the University of Virginia Law School (1997). She attended high school at Haderslev Katedraleskole in Denmark. She speaks German and Danish.

Ms. Weaver is admitted to practice in California (1997), the U.S. Court of Appeals for the Ninth Circuit (1998), the U.S. District Court for the Northern District of California (1997), and the U.S. District Court for the Eastern, Central, and Southern Districts of California (1998).

MATTHEW WEILER *Associate*	**Oakland**	• **Email: mweiler@bfalaw.com** • **Tel: +1 415 445 4011** • **www.bfalaw.com/matthew-weiler**

Matthew Weiler has more than a dozen years of experience litigating complex matters in both federal and California state courts, and focuses his practice on complex commercial litigation, including antitrust, consumer, and securities actions. He has been selected as a “Super Lawyer” and named a “Rising Star” in Northern California by Thomson Reuters.

Mr. Weiler primarily prosecutes antitrust actions at present, representing individuals, companies, and investors who have been harmed by fraud and unfair business practices. He currently is litigating claims against German car manufacturers, the self-named Fünfer-Kreise (Circle of Five), alleging the largest known single automobile cartel in U.S. and European history.

Prior to joining BFA, Mr. Weiler was an integral member of the team that collected $399 million in settlements for California purchasers of the drug Cipro, one of the largest cash settlements ever achieved under California antitrust law. Mr. Weiler also helped obtain settlements on behalf of direct purchasers of capacitors from members of an international price-fixing cartel, and previously pursued monopolization claims against the United Fighting Championship. Mr. Weiler additionally has experience with Foreign Sovereign Immunity Act litigation.

Mr. Weiler earned a B.A. from the University of Michigan, where he was a James B. Angell Scholar, and a J.D., *cum laude*, from the University of Michigan Law School (2004). He is admitted to practice in California (2005), the U.S. Court of Appeals for the Ninth Circuit (2013), and the U.S. District Courts for the Northern, Eastern, Central, and Southern Districts of California (2005).

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EMILY ALDRIDGE *Associate*	**Oakland**	• **Email: ealdridge@bfalaw.com** • **Tel: +1 415 445 4013** • **www.bfalaw.com/emily-aldridge**

Emily Aldridge is a skilled litigator with nearly six years of experience in all aspects of complex litigation and investigations, from case intake through trial and settlement.

Ms. Aldridge is responsible for client counseling; developing case strategy; evaluating claims; coordinating e-discovery; investigating and analyzing facts and evidence; drafting pleadings, briefs, memoranda, and contracts; preparing for and participating in court hearings, witness interviews, depositions, mediation, and arbitration; retaining and supervising expert witnesses; and negotiating settlements.

Prior to joining BFA, Ms. Aldridge was a litigation associate at Gibson, Dunn & Crutcher LLP, where her practice included complex commercial litigation, securities litigation, and defense of compliance and white collar investigations, as well as a wide variety of pro bono matters.

Ms. Aldridge earned a B.A., *magna cum laude, in cursu honorum*, from Fordham University and a J.D. from Fordham University School of Law (2011), where she served as a Notes and Articles Editor of the *Fordham Law Review*. She also completed a judicial clerkship with the Honorable Denny Chin of the U.S. Court of Appeals for the Second Circuit. She is proficient in German.

Ms. Aldridge is admitted to practice in New York (2012), California (2014), and the U.S. District Courts for the Southern and Eastern Districts of New York (2013) and the Northern and Southern Districts of California (2017).

ANNE DAVIS *Associate*	**Oakland**	• **Email: adavis@bfalaw.com** • **Tel: +1 415 445 4016** • **www.bfalaw.com/anne-davis**

Anne Davis has nearly a decade of experience litigating complex matters in both federal and state courts, including the courts of California, Delaware, and Kansas. She focuses her practice on complex investigations and litigation, including antitrust, consumer, and securities matters.

Ms. Davis currently is a member of the BFA team litigating *In re Inductors Antitrust Litigation*, representing a class of purchasers of inductors, a passive electronic component that is a key element of electronic circuits found in smart phones, laptops, computers and other consumer electronic devices; as well as *In re German Automotive Manufacturers Antitrust Litigation*; *In re Packaged Seafood Antitrust Litigation*; and *In re Domestic Airline Travel Antitrust Litigation* teams.

Prior to joining BFA, Ms. Davis served as a Principal Counsel for Sales Practice Enforcement at the Financial Industry Regulatory (FINRA), where she advised examination teams and coordinated and conducted complex investigations of violations of FINRA, U.S. Securities and Exchange Commission (SEC), and Municipal Securities Rulemaking Board (MSRB) rules, and the federal securities laws, including matters involving manipulative trading, anti-money-laundering compliance programs, supervision failures, net capital violations, and broker misconduct.

Before FINRA, she was a senior associate at Morrison & Foerster, LLP, where she specialized in securities litigation and enforcement, complex civil litigation, and internal investigations. She advised companies, board members, and executives in matters involving compliance with the U.S. federal and state securities laws; served as personal counsel to officers, directors, and employees called upon to testify in investigative and private litigation proceedings; and represented companies, board members, and executives in SEC, Exchange, and FINRA matters, securities fraud class actions, shareholder derivative actions, and complex commercial litigation. She also maintained a pro bono practice involving Title IX compliance in California public schools, litigation on behalf of prisoners asserting Section 1983 excessive force claims, and asylum claims.

Ms. Davis began her higher education at Harold Washington College, a City College of Chicago and went on to earn a B.A. with honors from the DePaul University, a M.A. (Political Science) from the University of Michigan (2006), and a J.D. from the University of Michigan Law School (2008). She is admitted to practice in California (2009), and the U.S. District Courts for the Central (2011) and Eastern Districts of California (2014).

JAVIER BLEICHMAR *Partner*	**New York**	• **Email: jbleichmar@bfalaw.com** • **Tel: +1 212 789 1341** • **www.bfalaw.com/javier-bleichmar**

Javier Bleichmar leads BFA's U.S. Case Evaluation and U.S. Securities Litigation teams. He brings a long career of litigation success to his prosecution of large-scale fraud class actions on behalf of investors. Mr. Bleichmar has nearly two decades of experience and has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Bleichmar was the lead attorney on the team that litigated *In re MF Global Holdings Ltd. Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors, in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained the complaint in its entirety, and the plaintiffs secured several settlements totaling more than $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Mr. Bleichmar similarly led the team that prosecuted *In re Weatherford International Securities Litigation* on behalf of the Anchorage Police & Fire Retirement System and Weatherford investors. The case alleged that Weatherford, which made three restatements of its audited financial statements totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the plaintiffs secured a $120 million settlement.

In addition to driving daily litigation, Mr. Bleichmar is a successful appellate advocate. After Mr. Bleichmar argued before the Eighth Circuit in *Public Pension Fund Group v. KV Pharmaceutical, Co.*, the Eighth Circuit reversed an earlier dismissal and clarified the standard governing pharmaceutical companies' disclosures relating to notifications by the Food and Drug Administration.

Mr. Bleichmar is active in educating investors on developing trends in the law, particularly the ability of global investors to participate in securities matters outside the United States. Through these efforts, many of his clients were able to join the organization representing investors in the first ever securities class

action settlement, under then-recently enacted Dutch law, against Royal Dutch Shell. He also provides thought leadership as a regular contributor on securities law issues in the *New York Law Journal*. He most recently co-authored "*IndyMac* Leaves Uncertain Landscape for Opt-Out Litigation" and "The Evolving Legacy of *Fait v. Regions Financial*."

Prior to founding the Firm, Mr. Bleichmar was a Partner of Labaton Sucharow LLP. He previously practiced at Bernstein Litowitz Berger & Grossmann LLP, where he was actively involved in *In re Williams Securities Litigation*, which resulted in a $311 million settlement for investors, as well as significant securities matters involving Lucent Technologies, Inc.; Conseco, Inc.; and Biovail Corp. Mr. Bleichmar began his legal career at Kirkland & Ellis LLP. He also is an active member of the National Association of Public Pension Attorneys (NAPPA).

Mr. Bleichmar earned a B.A. from the University of Pennsylvania and a J.D. from Columbia University School of Law (1998), where he was a Harlan Fiske Stone Scholar. During law school, he served as an intern to the Honorable Denny Chin, U.S. District Court Judge for the Southern District of New York. Mr. Bleichmar is a native Spanish speaker and fluent in French.

Mr. Bleichmar is admitted to practice in New York (1998), the U.S. Supreme Court (2010), and the U.S. Courts of Appeals for the Second Circuit (2010), Eight Circuit (2010), Ninth Circuit (2010), Tenth Circuit (2013), and Eleventh Circuit (2011). He is also admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (1999).

JOSEPH A. FONTI *Partner*	**New York**	• **Email: jfonti@bfalaw.com** • **Tel: +1 212 789 1342** • **www.bfalaw.com/joseph-fonti**

Joseph A. Fonti leads the Firm's U.S. Securities Litigation and Claims Filing teams. He has nearly twenty years of experience in prosecuting complex litigations on behalf of institutional investors. His commitment to clients, advocacy skills, and litigation results have earned him recognition as a *Law360* "Rising Star." He also has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Fonti served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation*, in the notoriously fast-paced jurisdiction of the Eastern District of Virginia, known as the "rocket docket." In defeating the defendants' motion to dismiss, he secured one of the first opinions favorable for investors following the Supreme Court's recent decision in the *Omnicare* matter. Mr. Fonti led the litigation to a remarkable recovery for the class, securing a settlement of $219 million, the largest ever securities class action recovery in Virginia.

Mr. Fonti previously achieved notable success in the Eastern District of Virginia as the lead lawyer in a fraud litigation on behalf of Computer Science Corp. shareholders. After prevailing at class certification, and only four weeks before trial, Mr. Fonti and his team secured a $97.5 million settlement—at the time, the second largest cash securities settlement in that court's history.

Mr. Fonti's career also is marked by significant successes in the area of auditor liability and stock options backdating. While representing investors in a class action against HealthSouth Corp., which settled for $671 million, Mr. Fonti played a significant role in recovering $109 million from outside auditor Ernst & Young LLP—one of the largest ever recoveries against an auditing firm. He also contributed to securing a

$173.5 million settlement in a class action against Broadcom Corp. relating to options backdating—at the time the second-largest cash settlement in such a case. That also was the only such case in which claims against the auditors were sustained.

Mr. Fonti has achieved notable success as an appellate advocate. His argument in *In re Celestica Inc. Securities Litigation* resulted in the Second Circuit's reversal of an earlier dismissal, turning the tide of then-recent decisions by realigning pleading standards in favor of investors. He also was instrumental in the advocacy before the Ninth Circuit in *In re Broadcom Corp. Securities Litigation*, where the appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.

Mr. Fonti represents several of Canada's largest pension systems and asset managers. He led the prosecution of securities class action against NovaGold Resources Inc., which resulted in the largest class settlement under Canada's securities laws at the time. He also provides thought leadership on issues particularly relevant to these clients. For example, he recently co-authored "Cross-Listed Securities Cases Present Challenges" in the *National Law Journal*, addressing interpretations of the Supreme Court's *Morrison* decision in light of modern financial markets.

Prior to founding the Firm, Mr. Fonti was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation and in multifaceted SEC investigations and trials. He also is a member of the National Association of Public Pension Attorneys (NAPPA).

Mr. Fonti earned a B.A., *cum laude*, from New York University and a J.D. from New York University School of Law (1999), where he was a member of the Marden Moot Court. He is admitted to practice in New York (2000), the U.S. Supreme Court (2007), and the U.S. Courts of Appeals for the Second Circuit (2010), Ninth Circuit (2007), and Tenth Circuit (2013). He also is admitted in the U.S. District Courts for the Southern and Eastern Districts of New York (2001).

DOMINIC J. AULD *Partner*	**Toronto**	• **Email: dauld@bfalaw.com** • **Tel: +1 212 789 1344** • **www.bfalaw.com/dominic-auld**

Dominic J. Auld leads BFA's Non-U.S. Litigation team. He has more than a decade of experience in representing and advising institutional clients in large-scale securities and investment-related lawsuits. Mr. Auld has been named a "Super Lawyer" in the field of securities litigation by *Super Lawyer* awards and has been "recommended" in the field of securities litigation by *The Legal 500*.

Mr. Auld is responsible for BFA's outreach to pension systems, asset managers, and sovereign wealth funds outside the United States—regularly advising clients in Europe, Australia, Asia, and across his home country of Canada.

Mr. Auld and his team have served as liaison counsel to global investors in many shareholder and investor litigations outside the United States, including class and collective actions against Olympus Corp. (Japan); OZ Minerals Ltd. (Australia); Fortis (Belgium and the Netherlands); Vivendi Universal (France); and Volkswagen AG (Germany).

Mr. Auld is sought after as a commentator on topics such as corporate governance, shareholder activism, fiduciary duty, corporate misconduct, and international class and collective litigation. He has been a regular speaker and panelist at law and investment conferences, including past events such as the Canadian Foundation for Advancement of Investor Rights (FAIR Canada) and Osgoode Hall Law School conference on public and private securities enforcement and investor recovery in Toronto, the IMF Bentham shareholder class action conference in Sydney, and the Annual International Bar Association meeting in Dubai.

Mr. Auld is the author of various articles of interest to the Firm's client base, including a recent analysis of shareholder remedies in Japan in *Law360*, and a piece regarding custodian bank fees and their impact on pension funds globally in *Nordic Regions Pensions and Investment News* magazine. He is quoted frequently in publications including *The Economist*, *The Financial Times*, *The New York Times*, *USA Today*, *The Times of London*, *The Evening Standard*, *The Guardian*, and *The Daily Mail*, and trade publications such as *Global Pensions*, *OP Risk and Regulation*, *The Lawyer*, *Investments and Pensions Europe*, *Professional Pensions*, and *Benefits Canada*. He also was interviewed by *Corporate Counsel* for a feature article on rogue trading.

Prior to founding the Firm, Mr. Auld was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, where he began his career as a member of the team responsible for prosecuting the landmark action *In re WorldCom Inc. Securities Litigation*, which resulted in a settlement of more than $6 billion.

Mr. Auld has years of experience working directly with institutional clients affected by securities fraud. For example, he worked extensively with the Ontario Teachers' Pension Plan Board as it led securities actions *In re Nortel Networks Corp. Securities Litigation*, *In re Williams Securities Litigation*, and *In re Biovail Corp. Securities Litigation*—cases that recovered a total of more than $1.7 billion for investors.

Mr. Auld earned a B.A. from Queen's University in Canada and a J.D. from Lewis and Clark Law School (1998). He is admitted to practice in New York (1998), and in the U.S. District Courts for the Southern and Eastern Districts of New York (2011).

WILSON MEEKS, III *Partner*	**New York**	• **Email: wmeeks@bfalaw.com** • **Tel: +1 212 789 1346** • **www.bfalaw.com/wilson-meeks**

Wilson Meeks, III is a key member of BFA's U.S. Case Evaluation and U.S. Securities Litigation teams. Mr. Meeks has nearly a decade of knowledge and experience in U.S. securities law and he currently concentrates his practice on prosecuting complex fraud claims on behalf of institutional investors.

Mr. Meeks played a significant role prosecuting *In re Genworth Financial Inc. Securities Litigation*, on behalf of Her Majesty the Queen in Right of Alberta and Genworth investors, in the notoriously fast-paced jurisdiction of the Eastern District of Virginia, known as the "rocket docket." The case alleged that Genworth, the largest seller of long-term care insurance in the United States, misled investors about the true state of the company's deteriorating long-term care business. Mr. Meeks spearheaded the Firm's prosecution and discovery efforts, helping to secure a $219 million settlement for investors—the largest ever securities class action recovery in Virginia.

He similarly played a key role in prosecuting *In re Weatherford International Securities Litigation* on behalf of the Anchorage Police & Fire Retirement System and Weatherford investors. The case alleged that Weatherford, which made three restatements of its audited financial statement totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the plaintiffs secured an outstanding recovery of $120 million.

Prior to joining the Firm, Mr. Meeks was an associate at Labaton Sucharow LLP, where he prosecuted financial litigation matters on behalf of institutional investors. He previously worked at Akin Gump Strauss Hauer & Feld LLP, where he focused on complex securities, commercial, and bankruptcy litigation.

Mr. Meeks earned a B.A. from Colgate University and a J.D. from Columbia Law School (2007), where he was a James Kent Scholar and was awarded both the Milton B. Conford Book Prize in Jurisprudence and the Samuel I. Rosenman Prize. He also completed judicial clerkships with the Honorable James Robertson of the U.S. District Court for the District of Columbia and the Honorable Dolores K. Sloviter of the U.S. Court of Appeals for the Third Circuit.

Mr. Meeks is admitted to practice in New York (2007), and the U.S. Courts of Appeals for the Second Circuit (2013), Third Circuit (2010), and Ninth Circuit (2012). He is also admitted in the U.S. District Courts for the District of Columbia (2009), and the Southern and Eastern Districts of New York (2011).

SARA PILDIS SIMNOWITZ *Special Counsel*	**New York**	• **Email: ssimnowitz@bfalaw.com** • **Tel: +1 212 789 2309** • **www.bfalaw.com/sara-simnowitz**

Sara Simnowitz has focused her practice in complex commercial and securities litigation for fifteen years and brings significant trial experience to the Firm.

Sara is a member of the Firm's U.S. Securities Litigation team, and she played a key role in the prosecution of *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. The plaintiffs recovered $219 million—the largest ever class action settlement in Virginia.

Before joining BFA, Sara was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. She previously practiced at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial and securities litigation.

Sara earned a B.A., *summa cum laude*, from Brandeis University, a J.D. from the University of Chicago Law School (2001), and an M.A. from the London School of Economics and Political Science (2002). She is admitted to practice in Massachusetts (2002), New York (2006), the U.S. Supreme Court (2008), the U.S. Court of Appeals for the First Circuit (2003), and the U.S. District Courts for the District of Massachusetts (2002), the Southern and Eastern Districts of New York (2006), and the Western District of New York (2008).

BLEICHMAR FONTI & AULD LLP

KENDRA SCHRAMM *Of Counsel*	New York	• Email: kschramm@bfalaw.com • Tel: +1 212 789 1358 • www.bfalaw.com/kendra-schramm

Kendra Schramm is a highly valued litigator with more than six years of experience prosecuting complex securities class actions. Kendra is a key member of the Firm's Non-U.S. Litigation and Claims Filing teams. She also assists the Client Reporting and Data Analysis team in assessing clients' loss exposure in both domestic and international matters.

Kendra acts as liaison counsel to institutional investors in securities and investment-related actions across the globe—including in Australia, Europe, and Japan. She provides highly pragmatic advice to sophisticated clients on the risks of participation in these cases, which often require a formal decision to pursue a claim. She is instrumental to BFA's outreach to institutional clients outside the United States. In addition, Kendra recently co-authored "A Look at Shareholder Remedies in Japan" in *Law360*, commenting on the evolving Japanese litigation regime.

Prior to joining the Firm, Kendra was an associate at Labaton Sucharow LLP, where she was a member of the team that recovered more than $1 billion in total settlements in the landmark securities class action against American International Group and numerous related defendants. She also was instrumental in prosecuting the complex securities litigation against the Federal National Mortgage Association (Fannie Mae), which successfully alleged that investors' losses were caused by the defendants' misstatements and misconduct, rather than the recent financial crisis, and recovered $170 million.

Kendra earned a B.A. from New York University and a J.D. from Brooklyn Law School (2011), where she was an Associate Managing Editor of the *Journal of Law & Policy*. During law school, she served as a law clerk to the Honorable Elizabeth S. Stong, U.S. Bankruptcy Court Judge for the Eastern District of New York. She is admitted to practice in New York (2012), New Jersey (2012), the U.S. Supreme Court (2014), and the U.S. District Courts for the Southern District of New York (2012) and the District of New Jersey (2012).

ERIN H. WOODS *Of Counsel*	New York	• Email: ewoods@bfalaw.com • Tel: +1 212 789 1353 • www.bfalaw.com/erin-woods

Erin Woods leads the Firm's outreach to institutional investors in the United States, advising public pension funds and other entities on securities, antitrust, and consumer litigation. She also is a member of the Firm's U.S. Case Evaluation team.

Erin has more than eight years of experience in securities law and the class action industry. Prior to joining BFA, Erin was a Director of Business Development for the Garden City Group, where she provided both plaintiff and defense counsel comprehensive, accurate, and practical approaches to class action and mass tort settlement administration.

Erin worked with the BFA attorneys as an associate at Labaton Sucharow LLP prior to joining the Garden City Group, litigating securities class actions such as *In re Celestica Inc. Securities Litigation* ($30 million settlement); *In re NovaGold Resources Inc. Securities Litigation* ($26.6 million cross-border settlement)—

at the time the largest ever class recovery under Canada's securities laws; and two related cases against OppenheimerFunds ($100 million settlement).

Erin earned a B.A. from Villanova University and a J.D. from Brooklyn Law School (2008). She is admitted to practice in New York (2009), the U.S. Courts of Appeals for the Ninth Circuit (2010) and Second Circuit (2011), and the U.S. District Court for the Southern District of New York (2009). She also is a member of the National Association of Public Pension Attorneys (NAPPA), the American Bar Association, the New York State Bar Association.

WILLIAM GERACI *Associate*	**New York**	• **Email: wgeraci@bfalaw.com** • **Tel: +1 212 789 1349** • **www.bfalaw.com/william-geraci**

William Geraci is a member of the Firm's U.S. Case Evaluation and U.S. Securities Litigation teams. Mr. Geraci has more than a decade of experience in complex litigation and is deeply familiar with all key aspects of securities class actions, including large-scale discovery efforts, evidentiary briefing, discovery disputes, dispositive motions, the use of expert testimony, and mediation proceedings.

Mr. Geraci was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered $219 million for investors—the largest ever class action settlement in Virginia.

He also was a member of the team that prosecuted *Weatherford International*. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately $1 billion, misled investors about the company's tax accounting. After more than three years of intense litigation, including 22 depositions and the production of eight million pages of documents, the plaintiffs secured a recovery of $120 million.

Prior to joining the Firm, Mr. Geraci worked at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted *In re Bear Stearns Companies, Inc. Securities Litigation* ($294.9 million settlement).

Mr. Geraci received a B.A., *cum laude*, from Hamilton College and a J.D. with honors from George Washington University (2005), where he was an Articles Editor of the *American Intellectual Property Association Quarterly Journal*. He is admitted to practice in New York (2006).

NICHOLAS DENNANY *Associate*	**New York**	• **Email: ndennany@bfalaw.com** • **Tel: +1 212 789 1354** • **www.bfalaw.com/nicholas-dennany**

Nicholas Dennany is a member of the Firm's U.S. Case Evaluation and U.S. Securities Litigation teams. He has more than a decade of litigation experience, with specific expertise in discovery matters and managing large-scale electronic document reviews. Mr. Dennany has been responsible for both the legal and technical aspects of the discovery process, and has routinely overseen production and receipt of electronic discovery in major securities actions.

He was a member of the team that prosecuted *Genworth Financial* in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that the defendants misled investors about the true state of the company's deteriorating long-term care business. BFA recovered $219 million for investors—the largest ever class action settlement in Virginia.

Mr. Dennany was also a key contributor to the Firm's recent success in *MF Global*, in connection with the company's dramatic collapse on October 31, 2011. The plaintiffs secured several settlements totaling more than $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Prior to joining the Firm, Mr. Dennany worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully prosecuted securities claims *In re Broadcom Corp. Securities Litigation* ($173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* ($26.6 million settlement).

Mr. Dennany earned a B.A., *cum laude*, from the University of Florida and a J.D. from the University of Florida, Levin College of Law (2004). He is admitted to practice in New York (2006).

EXHIBIT B

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

Firm Name: Bleichmar Fonti & Auld LLP **Reporting Period: March 1, 2017 through Present**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Weaver, Lesley (P)											4.70	8.60			13.30	$840.00	$11,172.00
Simnowitz, Sara (OC)												1.30			1.30	$675.00	$877.50
Aldridge, Emily (A)										0.30	2.30	0.30			2.90	$625.00	$1,812.50
Samra, Joshua (A)								5.40			7.50				12.90	$535.00	$6,901.50
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**5.40**	**0.00**	**0.30**	**14.50**	**10.20**	**0.00**	**0.00**	**30.40**		**$20,763.50**
NON-ATTORNEYS																	
Hensley, Kelsey (PL)												6.60			6.60	$350.00	$2,310.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.60**	**0.00**	**0.00**	**6.60**		**$2,310.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**5.40**	**0.00**	**0.30**	**14.50**	**16.80**	**0.00**	**0.00**	**37.00**		**$23,073.50**

EXHIBIT C

Date	Item	Timekeeper	Duration	Description
4/12/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Review and analyze Judge Gonazalez's order denying class certification without prejudice
4/12/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.4	identify key elements of Judge Gozalez's order denying clas cert. without prejudice [redacted];
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.2	develop proposed strategy with L. Renne and S. Cikes re: [redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.1	Coordinate with team re: [redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.2	Confer with L. Renne and S. Cikes re: th[redacted]
4/17/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.1	Review letter from co-lead counsel re: [redacted]
4/18/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Coordinate with S. Cikes and L. Renne re: [redacted];
4/18/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.4	Confer with clients re: [redacted];
4/26/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.3	Confer with B. Glackin re: [redacted];
5/24/2017	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with client regarding [redacted] and confer with lead counsel re [redacted]
12/7/2017	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	1.5	Research and draft summary of case status to inform client of [redacted].
12/8/2017	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	0.3	Research [redacted] to inform client.
12/11/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.5	Review and revise update re: [redacted]; send to Louise Renne, Steven Cikes to update clients re: [redacted]
12/11/2017	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	1	Review and revise update re: [redacted]; send to Louise Renne and Steve Cellars to update clients re: [redacted]
3/5/2018	(10) Class Certification/Experts	Aldridge, Emily	0.3	Analyze class certification opinion for [redacted].
5/3/2018	(11) Litigation Strategy, Analysis & Case Management	Aldridge, Emily	0.5	Draft update for clients to [redacted].
7/5/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Prepare for and confer with Shana Scarlett of Hagens Berman re [redacted].
7/5/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Follow up analysis of proposed settlements.
7/6/2018	(12) Negotiating Settlements	Weaver, Lesley	0.8	Confer re [redacted].
7/6/2018	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with Louise Renne and Steven Cikes re [redacted].
7/9/2018	(11) Litigation Strategy, Analysis & Case Management	Weaver, Lesley	0.9	Review and revise draft email to clients Palo Alto and Richmond re [redacted].
7/10/2018	(12) Negotiating Settlements	Aldridge, Emily	0.2	Research and identify [redacted] to which clients must [redacted].
7/10/2018	(12) Negotiating Settlements	Aldridge, Emily	0.1	Instruct Kelsey Hensley on [redacted].
7/10/2018	(12) Negotiating Settlements	Hensley, Kelsey	1.2	Draft and revise [redacted] for online [redacted]
7/10/2018	(12) Negotiating Settlements	Simnowitz, Sara	0.5	Attention to claims submissions and potential settlement analysis
7/13/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.7	Begin search for [redacted] and call TSG Reporting re [redacted] in support of drafting clients' claims forms.

7/16/2018	(12) Negotiating Settlements	Hensley, Kelsey	2.3	Work on obtaining [redacted] from TSG Reporting and review [redacted] for purposes of filling out claims forms for Richmond and Palo Alto clients.
7/16/2018	(12) Negotiating Settlements	Simnowitz, Sara	0.8	Attention to analysis of [redacted] and [redacted] filings.
7/16/2018	(12) Negotiating Settlements	Weaver, Lesley	0.5	Prepare for and attend call with Brendan Glackin of Lieff Cabraser re [redacted].
7/19/2018	(12) Negotiating Settlements	Weaver, Lesley	0.7	Prepare for and attend conference call with Louise Renne re [redacted]; confer with Steven Cikes re [redacted]
7/22/2018	(12) Negotiating Settlements	Weaver, Lesley	0.3	Confer with lead counsel re [redacted]
7/23/2018	(12) Negotiating Settlements	Weaver, Lesley	0.4	Coordinate call with lead counsel.
7/23/2018	(12) Negotiating Settlements	Hensley, Kelsey	1.8	Attention to settlement claims forms for cities of Richmond and Palo Alto.
7/24/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Confer with Steven Cikes and Louise Rene re [redacted]; confer re [redacted].
7/25/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Prepare for and attend call with S. Scarlett re [redacted].
9/5/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.5	Revise claims forms and send to claims administrator.
10/10/2018	(12) Negotiating Settlements	Weaver, Lesley	0.1	Follow up with claims administrator response to [redacted].
11/13/2018	(12) Negotiating Settlements	Hensley, Kelsey	0.1	Attention to emailing Marc Wall re [redacted].
11/20/2018	(12) Negotiating Settlements	Weaver, Lesley	0.9	Coordinate with L. Renne, S. Cikes re [redacted].
3/22/2019	(12) Negotiating Settlements	Weaver, Lesley	1.1	Coordinate with Joshua Samra re [redacted]; study [redacted] for Richmond and Palo Alto clients.
3/25/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	3	Conducting legal research regarding [redacted].
3/26/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.2	Conducting legal research regarding [redacted].
3/26/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	2.3	Conducting legal research regarding [redacted].
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	1.8	Drafting declaration in support of incentive awards.
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.2	Drafting declaration in support of incentive awards.
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	1.6	Drafting declaration in support of incentive awards.
3/27/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.8	Conducting legal research regarding [redacted].
3/27/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.7	Drafting declaration in support of incentive awards.
3/28/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	0.2	Conducting legal research regarding [redacted].
3/28/2019	(11) Litigation Strategy, Analysis & Case Management	Samra, Joshua	1	Conducting legal research regarding [redacted].
3/28/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.3	Drafting declaration in support of [redacted].
4/8/2019	(8) Drafting Pleadings, Briefs & Pretrial Motions	Samra, Joshua	0.8	Drafting declaration in support of [redacted].

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
Bleichmar Fonti & Auld LLP

Reported Expenses Incurred on Behalf of IPPs

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	$ 112.58
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	$ 13.07
Service of Process	
Special Supplies	
Telephone/Telecopier	$ 1.10
Travel	
Miscellaneous	
Total:	$ 126.75

EXHIBIT 7

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF LESLEY WEAVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLEICHMAR FONTI & AULD**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Lesley Weaver, declare:

1. I am Partner of Bleichmar Fonti & Auld, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to the City of Palo Alto, City of Richmond, and as counsel for IPPs throughout the course of this litigation. The background and experience of Bleichmar Fonti & Auld and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Bleichmar Fonti & Auld performed the following work: conferred with clients regarding settlement negotiations and approvals.

5. Attached hereto as **Exhibit B** is a billing summary of Bleichmar Fonti & Auld's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Bleichmar Fonti & Auld during this period of time was 1.9, with a corresponding lodestar based on current rates of $1520.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Bleichmar Fonti & Auld.

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

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

8. Bleichmar Fonti & Auld expended a total of $0.00 in unreimbursed costs and expenses in connections with the prosecution of this case and is not seeking any reimbursement of costs or expenses

9. I have reviewed the time and expenses reported by Bleichmar Fonti & Auld in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23rd, 2017 at New York, NY.

/s/ Lesley Weaver

Lesley Weaver

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BLEICHMAR FONTI & AULD LLP



FIRM RESUME

BLEICHMAR FONTI & AULD LLP

OVERVIEW

Founded in August 2014, Bleichmar Fonti & Auld LLP ("BFA" or the "Firm") is a boutique law firm based in New York, New York with an office in Oakland, California. The Firm focuses on evaluating and prosecuting complex securities fraud class actions and other investment-related matters on behalf of a wide range of domestic and international clients, including some of the largest institutional investors and asset managers in the world.

BFA has recovered over $600 million since the Firm's formation less than three years ago. This track record is reflective of what distinguishes BFA from other securities litigation boutiques: the collective experience of the Firm's litigators rivals that of older peer firms, while the Firm's lean operations and its outcome-driven litigation strategy allows us to focus on achieving the best possible result in each case. BFA's founding partners worked together for over a decade prior to launching BFA, recovering billions of dollars for investors while at other nationally-recognized firm. In just the last five years, BFA's founding partners have represented the lead plaintiffs in nearly two dozen securities class actions, including five since the Firm's founding. Our founders are supported by a team recruited for their excellence and dedication to our practice, having carefully built a talented team who have collaborated for years, ensuring a wealth of experience to draw on for our clients. Our Firm regularly challenges the top defense firms in the country, and our philosophy is central to the reputation we have built as tough adversaries.

Our attorneys are nationally recognized as leading litigators in the field of securities litigation, and our achievements have been profiled in a variety of national publications, including *The Wall Street Journal*, *The New York Times*, *Law 360*, the *National Law Journal's* Plaintiffs' Hot List, and the *Legal 500*. We are also frequently asked to comment on breaking developments in financial fraud, securities, and other investment-related issues.

BFA further distinguishes itself by not making any political contributions to government officials who have any role in the Firm's retention or selection as counsel.

LITIGATION HIGHLIGHTS

BFA has represented lead plaintiffs in the following five major securities class actions.

In re MF Global Holdings Ltd. Securities Litigation

- No. 11-cv-07866, Southern District of New York
- Client: Her Majesty the Queen in Right of Alberta
- Lead Attorneys: Javier Bleichmar, Dominic Auld, Cynthia Hanawalt

Total Settlements: $234 Million

Background: This case arose from MF Global's dramatic bankruptcy in October 2011. Plaintiffs alleged that defendants misrepresented the company's risk controls, liquidity position, and exposure to European sovereign debt, and failed to properly account for its deferred tax assets.

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BFA Role: BFA represented Court-appointed Co-Lead Plaintiff Alberta in this case. BFA partners Javier Bleichmar, Dominic J. Auld, and Cynthia Hanawalt, represented Alberta in this case since its inception in November 2011, and served as Court-appointed Co-Lead Counsel for the putative class since January 2012. When BFA launched in August 2014, the United States District Court approved Alberta's selection of BFA to serve as Co-Lead Counsel for the putative class continuing the core litigation team's representation.

Status: Lead Counsel achieved five partial settlements worth just over $234 million on behalf of investors: (1) a $74 million settlement with Goldman Sachs & Co. and certain other underwriters of the company's securities; (2) a $64.5 million settlement with former officers and directors, including former CEO Jon S. Corzine; (3) a $65 million settlement with the company's external auditor, PricewaterhouseCoopers LLP; (4) a $29.825 million settlement with Jefferies and other underwriters of the final bond offering issued during the Class Period, and (5) a separate $932,828 settlement with another underwriter defendant associated with the last offering. These settlements represent a recovery of approximately 35% of damages, an excellent result, particularly in light of the bankruptcy of the issuing entity.

These settlements were achieved after years of hard fought litigation. Following the Court's ruling sustaining the Complaint and denying defendants' six motions to dismiss in their entirety, Co-Lead Counsel reviewed millions of documents from defendants and third parties, and conducted over 50 depositions of former MF Global employees and other key witnesses, including four days of testimony from MF Global's former CEO Jon Corzine. The Court granted Plaintiffs' motion for class certification on October 14, 2015, which assisted in achieving the settlements.

In re Genworth Financial Inc. Securities Litigation

- No. 14-cv-00682, Eastern District of Virginia
- Client: Her Majesty the Queen in Right of Alberta
- Lead Attorneys: Joseph A. Fonti, Wilson Meeks

Total Settlement: $219 Million

Background: Plaintiffs alleged that defendants misrepresented the profitability of the company's core business and reported false financial results by grossly understating its long-term care insurance reserves. When Genworth announced a $531 million charge to its reserves, the company's stock price fell more than 55% – wiping out billions in market capitalization – and credit rating agencies downgraded the company and its corresponding debt to "junk" status.

BFA Role: BFA represented Court-appointed Co-Lead Plaintiff Alberta in this case. In November 2014, the United States District Court approved Alberta's selection of BFA to serve as Co-Lead Counsel for the putative class.

Status: On March 10, 2016, Genworth announced a proposed settlement of $219 million, the largest securities class action recovery ever achieved in Virginia. This result represents as much as 44% of the recoverable damages available at trial, many multiples of the average recoveries in securities class actions. BFA and Alberta sought and achieved a significant

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contribution from the company beyond available insurance: the Company funded $69 million of the settlement, while the remaining $150 million was funded by insurance.

This settlement came after 15 months of intense and rapid litigation. In December 2014, Lead Plaintiffs filed a consolidated complaint against the company and two of its former officers. In February 2015, defendants filed a motion to dismiss. BFA partner Joseph A. Fonti successfully argued against the motion in federal court on April 28, 2015, and the securities fraud claims were sustained on May 1, 2015.

BFA secured one of the most thoroughly-reasoned, investor-oriented decisions on the Supreme Court's then-recent *Omnicare* decision. The Court ruled that Lead Plaintiffs had sufficiently pled that defendants' statements were intended to mislead investors and to provide false assurances regarding the company's reserves. The Court also largely sustained allegations that defendants falsely certified that the company's internal controls were adequate.

The Eastern District of Virginia is known as the "rocket docket" for its rapid disposition of cases and strict adherence to scheduled deadlines. Plaintiffs filed their motion for class certification on December 3, 2015, fact discovery closed on January 15, 2016, and expert discovery ended on February 11, 2016. In effect, BFA conducted 30-48 months of litigation in 15 months. This effort included extensive trial preparation, over twenty depositions, and full briefing on class certification and summary judgment. At the time of settlement, BFA attorneys were preparing for trial, which was scheduled to begin on May 9, 2016.

Freedman et al. v. Weatherford International, Ltd.

- No. 12-cv-02121, Southern District of New York
- Client: Anchorage Police and Fire Retirement System
- Lead Attorney: Javier Bleichmar

Total Settlement: $120 Million

Background: Plaintiffs alleged that Weatherford, one of the world's largest oil and gas servicing companies, issued false financial statements that misled investors about its tax structure and internal controls. The company is alleged to have overstated its earnings by more than $900 million and was forced to issue three restatements pertaining to its failure to comply with Generally Accepted Accounting Principles ("GAAP").

BFA Role: BFA represented Court-appointed Co-Lead Plaintiff Anchorage in this case, and BFA partner Javier Bleichmar has represented Anchorage continuously since the case was filed in March 2012. BFA attorneys Joseph A. Fonti, Cynthia Hanawalt, and Wilson Meeks, also played key roles in the prosecution of this action.

Status: In September 2013, the team defeated defendants' motion to dismiss in its entirety. Class certification was granted in September 2014, fact discovery concluded in May 2015, after more than 20 depositions and the review of more than eight million pages of documents, and expert reports were exchanged in May 2015. Counsel announced the settlement in June 2015.

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The company agreed to settle all claims for $120 million out of pocket cash, with no available insurance, or approximately 30% of recoverable damages. The settlement approval hearing was held on November 3, 2015, and the judge filed his order approving the settlement the following day. Achieving this settlement required more than three years of intense litigation, including defeating defendants' motion to dismiss in its entirety, obtaining class certification, completing fact discovery, filing four expert reports, and preparing for expert discovery and summary judgment.

In re Computer Sciences Corp. Securities Litigation

- No. 11-cv-00610, Eastern District of Virginia
- Client: Ontario Teachers' Pension Plan Board
- Lead Attorney: Joseph A. Fonti

Total Settlement: $97.5 Million

Background: Plaintiffs alleged that the company and two of its officers misrepresented (i) a multi-billion dollar contract with the United Kingdom's National Health Service, and (ii) that the company's internal controls were adequate.

Lead Plaintiff: Ontario Teachers' Pension Plan Board ("OTPP").

BFA Role: BFA partners Javier Bleichmar, Joseph A. Fonti, and Dominic J. Auld represented Lead Plaintiff OTPP at all stages of this case. Partner Cynthia Hanawalt was also instrumental in prosecuting the action, prevailing at class certification and achieving the outstanding settlement. In August 2014, the United States District Court approved OTPP's selection of BFA as its counsel, continuing the team's representation.

At the time of the settlement, the settlement was the second-largest all cash recovery in the Eastern District of Virginia, and represented as much as 38% of recoverable damages at trial.

In re Celestica Inc. Securities Litigation

- No. 07-cv-00312, Southern District of New York
- Client: New Orleans Employees' Retirement System
- Lead Attorney: Joseph A. Fonti

Total Settlement: $30 Million

Background: Plaintiffs alleged false and misleading statements relating to a significant corporate restructuring plan, earnings, profitability, and financial outlook. When the company ultimately disclosed the truth, its stock price dropped 50%, reducing market capitalization by $1.3 billion.

Lead Plaintiffs: New Orleans Employees' Retirement System; Drywall Acoustic Lathing & Insulation Local 675 of the United Brotherhood of Carpenters and Joiners of America (Ontario, Canada).

BFA Role: BFA partner Joseph A. Fonti and Of Counsel Erin Rump represented Lead Plaintiffs in this case. Notably, Joseph successfully argued before the United States Court of

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Appeals for the Second Circuit, securing an investor-oriented interpretation of the pleading standard for scienter. Joseph also successfully argued class certification and summary judgment motions before the United States District Court, securing the first decision post-*Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S. Ct. 2398 (2014), in favor of investors on the issue of class-wide reliance.

Status: In April 2015, plaintiffs filed a motion for preliminary approval of a proposed $30 million settlement resolving all claims against the company and officer defendants. After the final settlement approval hearing was held on July 28, 2015, Judge George B. Daniels approved the $30 million settlement.

* * *

BFA attorneys have also played key roles in some of the most significant investor protection litigation in recent history, helping shareholders recover significant losses caused by financial misconduct in various industries across the marketplace. Select cases include:

In re Broadcom Corp. Class Action Litigation, Civ. No. 06-cv-5036 (C.D. Cal.).

The class action against Broadcom was based on allegations that the company inflated its stock price by intentionally backdating its stock option grants for over five years. Ultimately, the company was forced to issue a $2.2 billion restatement of its financial statements for the period spanning from 1998 through 2005, which became the largest restatement ever due to options backdating.

The company acknowledged the "substantial evidence" of backdating, and lead plaintiffs secured a $173.5 million settlement, which, at the time, was the second largest cash settlement ever involving a company accused of options backdating. This was also the only such case in which claims against the auditors were sustained.

In re HealthSouth Corp. Securities Litigation, Civ. No. 03-cv-1501-S (N.D. Ala.).

This case involved the largest securities fraud ever arising out of the healthcare industry, and ultimately resulted in a total settlement amount of $804.5 million for the class. The class action involved claims against HealthSouth for falsifying its revenues and conducting a series of acquisition transactions in order to effectuate a massive fraud against the Medicare system.

False statements by the company and its officers led to the inflation of HealthSouth's stock price, while at the same time company executives were amassing significant personal wealth by selling their own shares of HealthSouth stock.

Significantly, the litigation also resulted in the recovery of $109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm.

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In re Schering-Plough Corp. / ENHANCE Securities Litigation, Civ. No. 08-397 (D.N.J.).

Lead Plaintiffs brought litigation in the District of New Jersey against Schering-Plough Corporation and Merck/Schering-Plough Pharmaceuticals, and certain company officers, in *In re Schering-Plough Corp. / ENHANCE Securities Litigation*, alleging that they failed to disclose material information about the prospects of cholesterol-lowering drugs.

After nearly six years of litigation, Defendants agreed to pay $473 million to settle the matter on the eve of trial. This marked the largest securities class action recovery in history obtained from a pharmaceutical company. Together with a related securities class action against Merck, the *ENHANCE* litigation settled for $688 million.

TEAM PROFILES

JAVIER BLEICHMAR

Partner

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Javier Bleichmar brings a long career of litigation success to his prosecution of large-scale securities fraud class actions on behalf of institutional investors. Javier has been "recommended" in the field of securities litigation by the *Legal 500*.

Javier was the lead attorney on the team that litigated *In re MF Global Holdings Limited Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors, in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained the complaint in its entirety, and plaintiffs secured several settlements totaling over $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Javier similarly led the team that prosecuted *Freedman v. Weatherford International Ltd., et al.* on behalf of the Anchorage Police & Fire Retirement System. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately $1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, the parties announced a $120 million settlement on June 30, 2015.

In addition to driving daily litigation, Javier is also a successful appellate advocate. After Javier argued before the Eighth Circuit in *Public Pension Fund Group v. KV Pharmaceutical, Co.*, the Eighth Circuit reversed an earlier dismissal and clarified the standard governing pharmaceutical companies' disclosures relating to FDA notifications.

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Javier is also active in educating international institutional investors on developing trends in the law, particularly the ability of international investors to participate in securities class actions in the United States. Through these efforts, many of Javier's non-U.S. clients were able to join the organization representing investors (i.e., the Foundation) in the first securities class action settlement under the then-recently enacted Dutch statute against Royal Dutch Shell. He also provides thought leadership as a regular contributor on securities issues in the New York Law Journal. He most recently co-authored "IndyMac Leaves Uncertain Landscape for Opt-Out Litigation" and "The Evolving Legacy of Fait v. Regions Financial." Javier is an active member of the National Association of Public Pension Plan Attorneys (NAPPA).

Prior to founding the Firm, Javier was a Partner of Labaton Sucharow LLP. He previously practiced at Bernstein Litowitz Berger & Grossmann LLP, where he was actively involved in the *Williams Securities Litigation*, which resulted in a $311 million settlement, as well as significant securities matters involving Lucent Technologies, Inc., Conseco, Inc. and Biovail Corp. He began his legal career at Kirkland & Ellis LLP. During his time at Columbia Law School, Javier served as a law clerk to the Honorable Denny Chin, United States District Court Judge for the Southern District of New York. Javier is a native Spanish speaker and fluent in French.

Javier is admitted to the New York Bar, the Supreme Court of the State of New York, the United States Supreme Court, the U.S. Courts of Appeals for the Second, Eighth, Ninth, Tenth, and Eleventh Circuits, and the U.S. District Courts for the Southern and Eastern Districts of New York.

JOSEPH A. FONTI

Partner

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Joseph A. Fonti concentrates his practice on prosecuting complex securities and investment-related matters on behalf of institutional investors. Joseph's client commitment, advocacy skills, and litigation results have earned him recognition as a *Law360* "Rising Star." He was one of only five securities lawyers in the country—and the only investor-side securities litigator—to receive the distinction. Joe was also "recommended" in the field of securities litigation by the *Legal 500*.

Joseph served as co-lead counsel in *In re Genworth Financial Inc. Securities Litigation*, in the Eastern District of Virginia, widely known as the "rocket docket." In defeating defendants' motion to dismiss, Joseph secured one of the first pro-investor opinions after the Supreme Court's recent decision in the *Omnicare* matter. Joseph led the litigation to a remarkable recovery for the class in the amount of $219 million, the largest securities class action recovery ever achieved in that jurisdiction.

Joseph previously achieved notable success in the high-pressure environment of the Eastern

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District of Virginia. In 2013, Joseph was the lead trial lawyer litigating on behalf of shareholders of Computer Science Corp. After prevailing at class certification, and only four weeks before trial, Joseph and his team secured a $97.5 million settlement – what was then the second-largest cash securities settlement in the court's history.

With over a dozen years of experience in investor litigation, Joseph's career is also marked by significant successes in the area of auditor liability and stock options backdating. While representing shareholders in the *In re HealthSouth Securities Litigation*, which settled for $671 million, Joseph played a significant role in recovering $109 million from HealthSouth's outside auditor Ernst & Young LLP, one of the largest recoveries to date against an auditing firm. He also contributed to securing a $173.5 million settlement in *In re Broadcom Corp. Securities Litigation*, which, at the time, was the second-largest cash settlement involving a company accused of options backdating. This was the only such case in which claims against the auditors were sustained.

In addition to representing several significant U.S. institutional investors, Joseph has represented a number of Canada's significant pension systems and asset managers. He led the prosecution of *In re NovaGold Resources Inc. Securities Litigation*, which resulted in the largest settlement under Canada's securities class action laws. He also provides thought leadership on issues particularly relevant to these clients. For example, he recently co-authored "Cross-Listed Securities Cases Present Challenges" for the *National Law Journal*, which addresses recent *Morrison* interpretations in light of modern financial markets.

Joseph has also achieved notable success as an appellate advocate. His argument in *In re Celestica Inc. Securities Litigation* resulted in the Second Circuit's reversal of an earlier dismissal, turning the tide of then-recent decisions by realigning pleading standards in favor of investors. Joseph was also instrumental in the advocacy before the Ninth Circuit Court of Appeals in the *In re Broadcom Corp. Securities Litigation.* This appellate victory marked the first occasion a court sustained allegations against an outside auditor related to options backdating.

Prior to founding the Firm, Joseph was a Partner of Labaton Sucharow LLP. He also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, and began his legal career at Sullivan & Cromwell LLP, where he represented Fortune 100 corporations and financial institutions in complex securities litigation and in multifaceted SEC investigations and trials. Joseph is a member of the ABA, the NY State Bar Association and the Bar of the City of New York.

Joseph is admitted to the New York Bar, the U.S. Courts of Appeals for the First, Second, Ninth, and Tenth Circuits, and the U.S. District Courts for the Southern and Eastern Districts of New York.

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DOMINIC J. AULD

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Dominic J. Auld has over a decade's worth of experience advising clients in large-scale securities and investment-related lawsuits. Dominic was honored as a "Super Lawyer" in the field of securities litigation by *Super Lawyer* awards, marking his second consecutive year receiving that distinction. He has also been "recommended" in the field of securities litigation by the *Legal 500*.

Dominic spearheads the Firm's International Litigation Practice. Dominic is also responsible for the Firm's outreach to pension systems and sovereign wealth funds outside the United States – regularly advising clients in Europe, Australia, Asia, and across his home country of Canada.

Dominic is a frequent speaker and panelist on topics such as Corporate Governance, Shareholder Activism, Fiduciary Duty, Corporate Misconduct, and International Class and Collective Litigation. As a result of his expertise in these areas, he has become a sought-after commentator for issues concerning public pension funds, listed corporations, and securities and market regulation.

Dominic is also a regular speaker at law and investment conferences, including the Canadian Foundation for Advancement of Investor Rights and Osgoode Hall Investor Recovery Conference in 2015, as well as the IMF (Australia) Shareholder Class Action Conference in Sydney, and the Annual International Bar Association meeting in Dubai. Additionally, Dominic is frequently quoted in newspapers such as *The Economist*, *The Financial Times*, *The New York Times*, *USA Today*, *The Times of London*, *The Evening Standard*, *The Daily Mail*, *The Guardian*, and trade publications like *Global Pensions*, *OP Risk and Regulation*, *The Lawyer*, *Corporate Counsel*, *Investments and Pensions Europe*, *Professional Pensions*, and *Benefits Canada*.

Dominic is the author of various articles of interest to his client base, including a recent analysis of shareholder remedies in Japan on *Law360*, and a piece on custodian bank fees and their impacts on pension funds globally in *Nordic Regions Pensions and Investment News* magazine. He was also interviewed by Corporate Counsel for a feature article on rogue trading. Dominic is on the front-line of reforming the corporate environment, driving improved accountability and responsibility for the benefit of clients, the financial markets, and the public as a whole.

Prior to founding the Firm, Dominic was a Partner of Labaton Sucharow LLP. Dominic also practiced securities litigation at Bernstein Litowitz Berger & Grossmann LLP, where he began his career as a member of the team responsible for prosecuting the landmark *WorldCom* action which resulted in a settlement of more than $6 billion. He also has a great deal of experience working directly with institutional clients affected by securities fraud; he worked extensively with the Ontario Teachers' Pension Plan as it led securities actions *In re Nortel*

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Networks Corporation Securities Litigation, *In re Williams Securities Litigation*, and *In re Biovail Corporation Securities Litigation* – cases that settled for a total of more than $1.7 billion.

Dominic is admitted to the New York Bar, the Supreme Court of the State of New York, and the U.S. District Courts for the Southern and Eastern Districts of New York.

Cynthia Hanawalt Partner	• Email: chanawalt@bfalaw.com • Tel: 212-789-1345 • http://www.bfalaw.com/cynthia-hanawalt

Cynthia Hanawalt litigates complex securities fraud cases on behalf of institutional investors in class and direct actions nationwide. She was honored as a "Rising Star" in the field of securities litigation by *Super Lawyer* awards in 2015, marking her third consecutive year receiving this distinction.

Cynthia prosecuted *In re MF Global Holdings Limited Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta and MF Global investors in connection with the company's dramatic collapse on October 31, 2011. Judge Marrero in the Southern District of New York sustained plaintiffs' complaint in its entirety, and parties engaged in a complex discovery process, including several dozen depositions coordinated across multiple MF Global litigations. Plaintiffs achieved several settlements totaling over $234 million, resolving claims against MF Global's former officers and directors, several underwriter defendants, and MF Global's outside auditor.

Cynthia also prosecuted *In re Genworth Financial Inc. Securities Litigation*, a "rocket docket" matter that alleged the fraudulent concealment of Genworth's deteriorating long-term care business. And she recently contributed to the intense litigation of *Freedman v. Weatherford International Ltd., et al.*, seeking to recover losses for investors stemming from three restatements of audited financials by the company. On June 30, 2015, the parties announced a $120 million proposed settlement on behalf of the class.

Cynthia previously litigated *In re Computer Sciences Corporation Securities Litigation*, another highly compressed Eastern District of Virginia case, on behalf of Ontario Teachers' Pension Plan Board and the class, which settled for $97.5 million just a few weeks before trial. She also has significant experience prosecuting fraudulent activity in the securitization and sale of mortgage-backed securities.

Cynthia writes regularly on issues pertaining to the securities industry, and is the co-author of several articles, including: "A Look at Shareholder Remedies in Japan," *Law360*, June 15, 2016; "Cross-Listed Securities Cases Present Challenges," *The National Law Journal*, May 30, 2016, addressing recent Morrison interpretations in light of modern financial markets; "IndyMac Leaves Uncertain Landscape for Opt-Out Litigation," *New York Law Journal*, October 28, 2014; "The Evolving Legacy of Fait v. Regions Financial," *New York Law Journal*,

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May 3, 2013; "Dodd-Frank: Rating Agencies and the ABS Market," *Law360*, January 25, 2011; and "Theory of Implied Misrepresentation in Securities Fraud Cases," *New York Law Journal*, April 5, 2010.

Prior to joining the firm, Cynthia was an associate at Labaton Sucharow LLP. She began her legal career at McKee Nelson LLP, where she was part of the team that launched the firm's structured finance litigation practice. Prior to attending Columbia Law School, Cynthia was a consultant with The Boston Consulting Group, providing strategic and operational advice to Fortune 500 companies and local not-for-profit organizations. Cynthia serves on the Board of Directors of Wave Hill.

Cynthia is admitted to the New York Bar, the Supreme Court of the State of New York, and the U.S. District Courts for the Southern and Eastern Districts of New York.

WILSON MEEKS, III Partner	• Email: wmeeks@bfalaw.com • Tel: 212-789-1346 • http://www.bfalaw.com/wilson-meeks

Wilson ("Bill") Meeks, III concentrates his practice on prosecuting complex securities fraud cases on behalf of institutional investors.

Bill has played a key role litigating *In re Genworth Financial Securities Litigation*, on behalf of Her Majesty the Queen in Right of Alberta in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that Genworth, the largest seller of long-term care insurance in the U.S., misled investors about the true state of its deteriorating long-term care business. Bill spearheaded the Firm's prosecution and discovery efforts, which were conducted in accord with a highly accelerated schedule. The plaintiffs' claims against Genworth were resolved for $219 million, the largest securities class action recovery ever achieved in Virginia.

Bill was also a key member of the team who prosecuted *Freedman v. Weatherford International Ltd., et al.* on behalf of the Anchorage Police & Fire Retirement System, alleging that Weatherford, which made three restatements of audited financials totaling approximately $1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and complex expert testimony, plaintiffs reached an outstanding recovery of $120 million on behalf of shareholders.

Prior to joining the Firm, Bill was an associate at Labaton Sucharow LLP, where he also prosecuted financial litigation matters on behalf of institutional investors. He previously worked at Akin Gump Strauss Hauer & Feld LLP, where he focused on complex securities, commercial and bankruptcy litigation.

Bill completed judicial clerkships with the Honorable James Robertson of the United States District Court for the District of Columbia, as well as with the Honorable Dolores K. Sloviter of the United States Court of Appeals for the Third Circuit. Bill received his J.D. from

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Columbia Law School where he was a James Kent Scholar, and was awarded both the Milton B. Conford Book Prize in Jurisprudence and the Samuel I. Rosenman Prize.

Bill is admitted to the New York Bar, the U.S. Courts of Appeals for the Third and Ninth Circuits, and the U.S. District Courts for the Southern and Eastern Districts of New York and the District of Columbia.

LESLEY WEAVER Partner	• Email: lweaver@bfalaw.com • Tel: 415-445-4005 • http://www.bfalaw.com/lesley-weaver

Lesley Weaver has worked tirelessly throughout her nearly twenty-year career to protect the rights of investors, consumers, and public entities. Most recently, Lesley was appointed by U.S. District Judge Charles R. Breyer to the Plaintiffs' Steering Committee for *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litig.*, MDL No. 2672 CRB (JSC), the case involving VW's knowing sale of vehicles whose emission controls systems did not function while on the road by deliberate design. Lesley is one of twenty-two plaintiffs' lawyers selected from 150 nationwide applicants to lead the case. Following the selection process, the *National Law Journal* called the twenty-two lawyers the "class action 'dream team.'" The team has delivered landmark results. Working in unprecedented coordination with the Department of Justice, the California Attorney General, and the Federal Trade Commission, the team has recovered more than $18 billion for class members, the largest automotive class action recovery ever. As stated in Judge Breyer's March 17, 2017 Order, "class counsel provided enormous benefit to the Class, and did so in an unprecedentedly speedy fashion." The FTC declared that consumers have been "made whole," with current average recovery of 133% per class member expenditure.

Lesley also has extensive experience in securities litigation matters. She played significant roles in *In re Marsh & McLennan Cos. Sec. Litig.* ($400 million settlement); *In re Cardinal Health Inc. Sec. Litig.* ($600 million settlement); and *In re Cisco Systems, Inc. Sec. Litig.* ($99 million settlement), among other notable cases. Lesley has represented numerous NAPPA members in the course of her career, both in such actions and in an advisory role. In addition, she counsels private clients seeking to opt out of class action litigation, assisting them in negotiating confidential, private settlements, with outstanding results.

Lesley's most recent focus has been on antitrust matters, in which she represents both individual consumers and business entities. She represents the Cities of Palo Alto and Richmond, California, leading a municipal subclass in *In re Lithium Ion Batteries Antitrust Litig.*, and she represents Oakland County, Michigan in *In re Liquid Aluminum Sulfate Antitrust Litig.* She is also significantly involved in other pending cases, including *In re: Contact Lens Antitrust Litig., In re: Seafood Products Antitrust Litig., In re: Domestic Airlines Antitrust Litig., and In re: LIBOR Antitrust Litig.*

Lesley's extensive trial experience has spanned her career. Lesley is committed to public service through volunteer efforts, and currently serves on the advisory council of the East

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Bay Community Law Center, as well as the Executive Committee for the Bar Association of San Francisco. She is a past Co-Chair of Bay Area Lawyers for Individual Freedom, a past Co-Chair of the San Francisco LGBT Community Center, past National Chair of the National Center for Lesbian Rights, and past Vice-President and Director of the Board of the Frameline Film Festival. She has previously served on the boards of Women Lawyers of Alameda County, Equality California, the International Gay and Lesbian Human Rights Commission, and the Alice B. Toklas Democratic Club.

Lesley is admitted to the Bars of California and Delaware (inactive), the U.S. District Courts for the Eastern, Southern, Central, and Northern Districts of California, and the U.S. Courts of Appeals for the Ninth and Eleventh Circuits.

Lesley holds degrees from the University of Virginia, Harvard College, and the University of Bonn (Germany), and attended high school at Haderslev Katedraleskole in Denmark. She speaks fluent German and Danish, and some French.

ERIN H. RUMP Of Counsel	• Email: erump@bfalaw.com • Tel: 510-844-7759 • http://www.bfalaw.com/erin-rump

With more than 8 years in the class action industry, Erin Rump leads institutional investor outreach and advises pension funds and other entities on lawsuits concerning violations of U.S. and non-U.S. securities and investment laws as well as antitrust and consumer laws.

Prior to joining BFA, Erin was a Director of Business Development for the Garden City Group, LLC, where she provided plaintiffs' and defense counsel comprehensive, accurate, and practical approaches to class action and mass tort settlement administration.

While working with the BFA attorneys as an associate at Labaton Sucharow LLP prior to joining the Garden City Group, Erin litigated securities class actions such as *In re Celestica Inc. Securities Litigation*, *In re NovaGold Resources Inc. Securities Litigation*, which resulted in a cross-border settlement that was at the time the largest settlement under Canada's securities class action laws, and two related cases against OppenheimerFunds Inc. that resulted in a $100 million settlement.

Erin is a member of the American Bar Association and the New York State Bar Association.

Erin is admitted to the New York Bar, the U.S. Courts of Appeal of for the Second and Ninth Circuits, and the U.S. District Court for the Southern District of New York.

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KENDRA SCHRAMM Associate	• Email: kschramm@bfalaw.com • Tel: 212-789-1358 • http://www.bfalaw.com/kendra-schramm

A highly valued litigator with meaningful experience in large and complex securities matters, Kendra Schramm is a member of the Firm's International Litigation Group, where she advises and represents BFA clients in securities and investment-related cases filed across the globe – including matters in Japan, France, Belgium, the UK, the Netherlands, Germany, Italy and elsewhere. Kendra provides highly pragmatic advice to leading institutional investors on the comparative risks and merits of potential litigation – the majority of which requires a formal decision to participate. Kendra is instrumental to the Firm's outreach to pension systems and sovereign wealth funds outside the United States to ensure their interests are represented in meritorious international litigation matters. Kendra also works with the Firm's Client Monitoring and Case Evaluation Group to assist in the assessment and prosecution of domestic securities class actions.

Kendra recently co-authored "A Look at Shareholder Remedies in Japan," in *Law360*, analyzing the evolving Japanese litigation regime.

Prior to joining the Firm, Kendra was an associate at Labaton Sucharow LLP, where she was a member of the team that recovered more than $1 billion in total settlements in the landmark securities litigation against American International Group, Inc. and numerous related defendants. Kendra was also instrumental in prosecuting the complex securities litigation against the Federal National Mortgage Association (Fannie Mae), which successfully alleged that investors' losses were caused by Fannie Mae's statements and actions rather than the financial crisis. The case resulted in a $170 million settlement.

Kendra is admitted to the New York and New Jersey Bars, the United States Supreme Court, the Supreme Court of the State of New York, the New Jersey Supreme Court, and the U.S. District Courts for the Southern District of New York and the District of New Jersey.

ROBYN ENGLISH Associate	• Email: renglish@bfalaw.com • Tel: 212-789-1359 • http://www.bfalaw.com/robyn-english

Robyn R. English is an associate dedicated to prosecuting securities, antitrust, and consumer fraud class actions. These matters include a large-scale emissions fraud perpetrated by Volkswagen and other defendants in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litig.*, which has resulted to date in settlements totaling over $17 billion, the largest auto manufacturer class settlement yet, and one of the largest consumer recoveries ever.

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Robyn completed a judicial clerkship with the Honorable Beryl A. Howell, Chief Judge of the United States District Court for the District of Columbia, where she worked on civil and criminal matters. Prior to joining the firm, she was an associate at Paul, Weiss, Rifkind, Wharton & Garrison, where she litigated complex antitrust and investment-related disputes. Ms. English also worked at Kirkland and Ellis, LLP, where she gained experience in antitrust, commercial, and bankruptcy litigation.

Robyn received her J.D. from Georgetown University Law Center, and graduated Phi Beta Kappa from Georgetown University, where she was a member of Georgetown's NCAA Women's Golf Team.

Robyn is admitted to the New York Bar.

WILLIAM GERACI Associate	• Email: wgeraci@bfalaw.com • Tel: 212-789-1349 • http://www.bfalaw.com/william-geraci

William ("Bill") has nearly a decade of litigation experience and is deeply familiar with many key aspects of complex litigation, including large-scale discovery efforts, evidentiary briefing – including discovery disputes and summary judgment motions – the use of expert witnesses, and mediation proceedings.

Bill was a member of the team that litigated *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that Genworth, the largest seller of long-term care insurance in the U.S., misled investors about the true state of its deteriorating long-term care business. On May 1, 2015, U.S. District Judge James R. Spencer denied defendants' motion to dismiss, ruling that plaintiffs had sufficiently pled securities fraud claims against Genworth and its CEO and CFO. On March 10, 2016, Genworth announced a proposed settlement of $219 million, the largest securities class action recovery ever achieved in Virginia.

Bill was previously a key member of the team that prosecuted securities litigation against Weatherford International Ltd. on behalf of the Anchorage Police & Fire Retirement System. The case alleged that Weatherford, which made three restatements of audited financials totaling approximately $1 billion, misled investors about the Company's tax accounting. After more than three years of intense litigation, including 22 depositions and the production of eight million pages of documents, the parties announced a $120 million settlement on June 30, 2015.

Prior to joining the Firm, Bill worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully litigated *In re Bear Stearns Companies, Inc. Securities Litigation*, securing a $275 million settlement with

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Bear Stearns Companies, and a $19.9 million settlement with Deloitte & Touché LLP, Bear Stearns' outside auditor. Bill received his J.D. from George Washington University Law School, where he graduated with honors.

Bill is admitted to the New York Bar.

MILI DESAI Associate	• Email: mdesai@bfalaw.com • Tel: 510-844-7740 • http://www.bfalaw.com/mili-desai

Mili Desai is an experienced litigator dedicated to prosecuting antitrust and consumer fraud class actions on behalf of a variety of institutional, municipal, and individual clients. She is a key member of the team suing several contact lens manufacturers for an alleged retail price maintenance scheme in *In re Disposable Contact Lens Antitrust Litigation*, and also has significant responsibility on the team prosecuting the large-scale emissions fraud perpetrated by Volkswagen and other defendants in *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*.

Prior to joining BFA, Mili was an associate at Akin Gump Strauss Hauer & Feld, litigating on behalf of creditors and debtors in the bankruptcy process, representing senior executives of financial institutions before various government prosecutors and regulators, and litigating complex commercial disputes. Previously, Ms. Desai worked at Willkie Farr & Gallagher, gaining experience in antitrust, white collar, and commercial litigation.

Mili received her J.D. from Harvard Law School, and graduated magna cum laude from the University of Texas with a BBA in Finance and a BA in English.

Mili is admitted to the New York and California Bars and U.S. District Courts for the Eastern, Southern, and Northern Districts of California.

NICHOLAS DENNANY Associate	• Email: ndennany@bfalaw.com • Tel: 212-789-1354 • http://www.bfalaw.com/nicholas-dennany

Nicholas ("Nick") has nearly a decade of discovery expertise, having managed multiple large-scale electronic document reviews from start to finish. Nick has also been responsible for both the legal and technical aspects of the discovery process, and has routinely overseen the production and receipt of electronic discovery in major securities litigations.

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Nick was a member of the team that litigated *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that Genworth, the largest seller of long-term care insurance in the U.S., misled investors about the true state of its deteriorating long-term care business. On May 1, 2015, U.S. District Judge James R. Spencer denied defendants' motion to dismiss, ruling that plaintiffs had sufficiently pled securities fraud claims against Genworth and its CEO and CFO. On March 10, 2016, Genworth announced a proposed settlement of $219 million, the largest securities class action recovery ever achieved in Virginia.

Prior to joining the Firm, Nick worked with many of the attorneys now at BFA while at Labaton Sucharow LLP, where he was a member of the team that successfully litigated and ultimately secured significant settlements in *In re Broadcom Corp. Securities Litigation* ($173.5 million settlement) and *In re NovaGold Resources Inc. Securities Litigation* ($28 million CDN).

Nicholas is admitted to the New York Bar.

SARA PILDIS SIMNOWITZ Special Litigation Counsel	• Email: ssimnowitz@bfalaw.com • Tel: 212-789-2309 • http://www.bfalaw.com/sara-simnowitz

Sara is an experienced litigator who brings significant trial experience to the Firm. She played a key role in the litigation of *In re Genworth Financial Securities Litigation* on behalf of Her Majesty the Queen in Right of Alberta in the notoriously fast-paced jurisdiction of the Eastern District of Virginia. The case alleged that Genworth misled investors about the true state of its deteriorating long-term care business.

Before joining BFA, Sara was a senior associate at Arnold & Porter LLP, where she focused on complex commercial litigation. Sara was previously an associate at Heller Ehrman LLP in New York and Foley Hoag LLP in Massachusetts, where she focused on complex commercial litigation and securities litigation.

Sara is admitted to the New York and Massachusetts Bars, the United States Supreme Court, the U.S. Court of Appeals for the First Circuit, and the U.S. District Courts for the Southern, Eastern, and Western Districts of New York and the District of Massachusetts.

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BRITT CIBULKA Special Projects Attorney	• Email: bcibulka@bfalaw.com • Tel: 510-844-7740 • http://www.bfalaw.com/britt-cibulka

Britt has over a decade of discovery experience and has managed multiple document and privilege reviews. She has contributed to multiple trial teams, using her expertise to identify case-critical documents and managing their use through deposition and trial. Britt has also provided privilege law training to in-house counsel and numerous attorney review teams.

Britt is currently litigating *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*. Working in coordination with the Department of Justice, the California Attorney General, and the Federal Trade Commission, Plaintiffs have secured settlements totaling over $15.7 billion covering over 465,000 Volkswagen 2.0L diesel car owners, and continue to pursue relief for over 85,000 owners of 3.0L Volkswagen, Audi and Porsche diesel cars.

Prior to joining BFA, Britt was an attorney at Wilson, Sonsini, Goodrich & Rosati in Palo Alto, California, where she managed multiple privilege reviews and conducted pre-trial discovery for intellectual property and white collar criminal cases. She previously contracted with Google's in-house legal discovery team, where she managed large and complex privilege reviews for antitrust, intellectual property, and securities cases. She was also a member of several trial teams at Morrison & Foerster, where she contributed to the successful defense of clients from initial production through trial.

Britt is admitted to the California and Illinois Bars.

MICHAEL A. RUSSO Director of Operations	• Email: mrusso@bfalaw.com • Tel: 212-789-1350 • http://www.bfalaw.com/michael-russo

As BFA's Director of Operations, Michael Russo oversees the management of the Firm, including all technology, human resources, and facilities-related functions. Michael works to ensure that the Firm is operating at the highest level, with the capabilities and responsiveness necessary to serve BFA's clients. In this capacity, he facilitates the day-to-day needs of the Firm as well as its long-term strategic goals.

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Michael brings over a decade of law firm experience to his role, and his insight into the practical requirements of successful litigation is central to his management of Firm operations. Prior to joining the firm, Michael was a Senior Paralegal at Labaton Sucharow LLP. He has accumulated significant experience managing the litigation needs of dozens of complex cases throughout his career, and has a thorough understanding of staff oversight, caseload management, and all aspects of litigation ranging from case initiation through trial.

Michael received his B.A. from Marist College where he earned his degree in economics. He is a member of the Association of Legal Administrators (ALA).

JANEL LOSOYA

Director of Client Reporting & Data Analysis

- Email: jlosoya@bfalaw.com
- Tel: 212-789-1351
- http://www.bfalaw.com/janel-losoya

Janel Losoya is the Firm's Director of Client Reporting and Data Analysis. She oversees BFA's Global Investment Monitoring Program, analyzing clients' exposure to financial fraud across the global marketplace. Janel works to strengthen relationships with Firm clients and the financial institutions that support them, and provides infrastructure and technical support as needed to manage clients' investment data. Her analysis is vital to the Firm's analysis of the merits, parties, and risks of participation in potential new matters, including class cases, direct actions and international litigation.

Prior to joining the Firm, Janel was a data analyst at Labaton Sucharow LLP, where she spearheaded the firm's efforts to develop a platform to assess clients' vulnerability in investments on international exchanges.

Janel began her career as a pricing analyst at AllianceBernstein LP, where she worked on complex financial instruments including mortgage-backed securities and derivative products. Janel received her bachelor's degree in business administration from the University of Texas at San Antonio.

For more information, please visit: www.BFAlaw.com

EXHIBIT B

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

Firm Name: Bleichmar Fonti & Auld **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Lesley Weaver (P)											0.20	1.70			1.90	$800.00	$1,520.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**1.70**	**0.00**	**0.00**	**1.90**		**$1,520.00**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**1.70**	**0.00**	**0.00**	**1.90**		**$1,520.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

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ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Lesley Weaver	08/01/17 - Present	800/hr
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

Client	Matter	Date	Status	Invoice Nu	Item	Event	Timekeepe	Initials	Title	Duration	Rate	Cost	Amount	Description	Approval Status
2004.001	In re Lithiur	11/23/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.1	0	0	0	Confer re: new proposed [redacted]	Pending
2004.001	In re Lithiur	11/23/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.2	0	0	0	reach out to [redacted]	Pending
2004.001	In re Lithiur	11/28/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.1	0	0	0	discuss [redacted]	Pending
2004.001	In re Lithiur	11/28/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.2	0	0	0	Coordinate with LR, SC [redacted]	Pending
2004.001	In re Lithiur	11/29/2016	Submitted		(11)	Litigation Strategy	Weaver, L	LW		0.2	0	0	0	Follow up with RG	Pending
2004.001	In re Lithiur	11/29/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.2	0	0	0	confer with RG [redacted]	Pending
2004.001	In re Lithiur	11/30/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.1	0	0	0	communicate [redacted]	Pending
2004.001	In re Lithiur	11/30/2016	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.1	0	0	0	Confer with [redacted]	Pending

Client	Matter	Date	Status	Invoice Nu	Item	Event	Timekeepe	Initials	Title	Duration	Rate	Cost	Amount	Description	Approval Status
2004.001	In re Lithiu	1/2/2017	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.3	0	0	0	Follow up with [redacted]	Pending
2004.001	In re Lithiu	1/19/2017	Submitted		(12)	Negotiating Settle	Weaver, L	LW		0.4	0	0	0	Confer with [redacted]	Pending

EXHIBIT 8

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF WHITNEY E. STREET IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLOCK & LEVITON LLP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Whitney E. Street, declare:

1. I am a partner at Block & Leviton LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to counsel for IPPs throughout the course of this litigation. The background and experience of Block & Leviton LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Block & Leviton performed the following work: coordinated discovery of municipal plaintiffs, the City of Richmond and Palo Alto; defended client depositions; performed Korean and English language document review; assisted with factual research for IPPs' expert reports; assisted with preparation for depositions of Defendants' expert witnesses; and, performed legal research and drafting related to the reply in support of IPPs' motion for class certification.

5. A summary of work performed by Block & Leviton and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Whitney E. Street in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Block & Leviton LLP and filed on May 26, 2017. (ECF No. 1813-7). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Block & Leviton LLP since June 1, 2013 was 1,513.70, with a corresponding lodestar of $697,196.00 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses Block & Leviton LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Block & Leviton LLP expended a total of $52,449.31 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Block & Leviton LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Block & Leviton LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at San Francisco, California.

/s/ Whitney E. Street

Whitney E. Street

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT

B C E IT I E E

BLOCK & LEVITON LLP

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610 16th Street, Suite 214 | Oakland CA 94612
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Firm Resume

BLOCK & LEVITON LLP

FIGHT FOR A LEVEL PLAYING FIELD.

Block & Leviton believes investors, pensioners, consumers and employees deserve an advocate who will take a stand to protect their rights. We value our role not only in recovering our clients' immediate losses, but in protecting their long-term interests by helping to shape corporate policy. We genuinely enjoy our work, which each day offers an opportunity to tackle novel problems and unique challenges in a continuously evolving economy. We concur with Aristotle's observation that pleasure in the job puts perfection in the work. We believe this is reflected in our track record, which includes our ability to take a case to trial and win, as well as our appointment as lead or co-lead counsel in many dozens of high profile matters, including:

In re BP Securities Litig., Case No. 4:10-MD-02185 (S.D. Tex.) (settled for $175 million), *In re Google Class C Shareholder Litig.*, Case No. 7469-CS (Del. Ch.) (settled for $522 million), *In re: Drywall Antirust Litig.,* Case No. 13-md-02437 (E.D. Pa.) (settled for approximately $17 million), and *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices and Products Liability Litig.*, Case No. 3:15-md- 02672 (N.D. Cal.) (settlement valued at approximately $15 billion). Our attorneys have successfully recovered billions for our clients and class members and have done so even under adverse conditions, including successfully litigating against bankrupt and foreign-based corporations.

DEFY CONVENTION.

Instrumental to our philosophy is the willingness to embrace new ways of seeing, and solving, our clients' problems. For example, we challenged Google Inc.'s plan to issue a new class of non-voting stock that threatened to diminish the value of minority investors' holdings in the company. With trial set to begin in less than two days, Block & Leviton brokered a settlement with Google Inc. and its directors that provided for a forwardlooking payment ladder (valued at up to $7.5 billion) to protect minority investors against future diminution in their stock value. As a result of the payment ladder, shareholders ultimately recovered $522 million in cash and stock in May 2015. Appreciation of the fact that each of our clients has a unique viewpoint allows us to tailor our advice and representation accordingly to achieve superior results, and to do so with maximum efficiency.

SURROUND YOURSELF WITH THE BEST.

The Firm credits its success to its entire team of extremely talented, dedicated attorneys, the majority of whom have significant litigation experience. An in-depth curriculum vitae highlighting each attorney's areas of expertise, unique experience, recognition in the field and education credentials follows.



JEFFREY C. BLOCK

Partner

jeff@blockesq.com

EDUCATION

- Brooklyn Law School, J.D., *cum laude* 1986
- State University of New York, B.A., Political Science, *cum laude* 1983

BAR ADMISSIONS

- New York
- Massachusetts

COURT ADMISSIONS

- United States Supreme Court
- First, Second, Third, Ninth, and Eleventh Circuit Courts of Appeal
- D. Mass.
- S.D.N.Y. and E.D.N.Y.

PUBLICATIONS | SPEAKING EVENTS

- ALI-ABA Conference for Insurance and Financial Services Industry Litigation, July 2009, Lecturer and Panelist
- Damages in Securities Litigation, sponsored by Law Seminars International at the Harvard Club, Panelist
- Litigation to Remedy Meltdown Damages: What Can Be Gained?, Harvard Law School's Capital Matters Conference, Speaker
- Guest commentator on NBC
- International Strategies Recoveries for Foreign Investments, Post Morrison, San Francisco Bar Association, Panel Moderator

Jeffrey Block is a co-founding partner of Block & Leviton. With a career spanning thirty years, Jeff is recognized as one of the nation's preeminent class action attorneys and is recognize as a "Super Lawyer" by Massachusetts Super Lawyers. Jeff currently represents the Ohio Public Employees Retirement System in *In re BP Sec. Litig.*, No. 4:10-MD-02185 (S.D. Tex.), charging that BP misled investors as to the amount of oil leaking from the Macondo well after the explosion aboard the Deepwater Horizon oil rig in the Gulf of Mexico in 2010. Jeff, on behalf of the plaintiffs, successfully argued against defendants' motions to dismiss, in favor of class certification, in opposition to summary judgment, and helped secure a settlement of $175 million for the class, which represents more than 60% of the class' actual losses. Jeff also represented the Brockton Retirement System in an action challenging Google's attempt to split its stock into voting and non-voting shares. *See In re Google, Inc. Class C S'holder Litig.*, Case No. 7469-CS (Del. Ch. Ct.). Two days before the start of trial, the action settled for significant corporate governance changes and a payment ladder valued up to $7.5 billion, which was designed to protect shareholders against any diminution in the value of their shares during the first year of trading. Because of the payment ladder, shareholders ultimately recovered $522 million in cash and stock in May 2015.

In addition, Jeff represents some of the country's largest institutional investors, including the Massachusetts Pension Reserves Investment Management Board (PRIM), the Ohio Public Employees Retirement System, the Ohio State Teachers Retirement System, the Washington State Investment Board, the New Mexico Educational Retirement Board, the New Mexico Public Employees Retirement System, the New Mexico State Investment Council and the Oklahoma Police Pension and Retirement System.

Some of the major class actions that Jeff has either led, or played a significant role in, include: *In re First Executive Corp. Securities Litig.*, 89-cv-7135 (C.D. Cal.) (settled for $100 million); *In re Xerox Corp. Sec. Litig.*, 3:00-cv- 01621 (D. Co11nn.) (settled for $750 million); *In re Bristol Myers Squibb Sec. Litig.*, 02-cv-2251 (S.D.N.Y.) (settled for $300 million); *In re Lernout & Hauspie Sec. Litig.*, 1:00-cv-11589 (D. Mass.) (settled for $180 million); *In re Symbol Technologies Sec. Litig.*, 2:02-cv-1383 (E.D.N.Y.) (settled for $127 million); *In re Prison Realty Corp. Sec. Litig.*, 3:99-cv-0452 (M.D. Tenn.) (settled for over $100 million); *In re Philip Services Corp. Sec. Litig.*, 98-cv-835 (S.D.N.Y.) (settled for $79.75 million); *In re American Home Mortgage Sec. Litig.*, 07-MD-1898 (E.D.N.Y.) (settled for $50.5 million); *In re Force Protection Sec. Litig.*, 2:08-cv-845 (D.S.C.) ($24 million settlement); *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.) ($5.5 million settlement).

Jeff has a proven record of overcoming significant challenges to obtain substantial recoveries on behalf of his clients. For example, in the Philip Services securities litigation, Jeff persuaded the United States Court of Appeals for the Second Circuit to reverse the District Court's dismissal of the action on the grounds of forum non conveniens. *See Dirienzo v. Philip Services Corp.*, 294 F.3d 21 (2d. Cir. 2002).

Upon reversal, Jeff led the team of attorneys in taking more than 40 depositions and, upon the eve of trial, the action settled for $79.50 million, among the largest recoveries ever in a securities action from a Canadian accounting firm. Jeff's skills were discussed in great lengths by the court, specifically noting that counsel:

> pursued this fact-intensive and legally complex litigation vigorously over a nine-year period, rejected offers of settlement for amounts inferior to the amounts upon which the parties ultimately agreed, and assumed significant risks of non-recovery. Co-Lead Counsel had to overcome the disclaimers and uncertainties of insurance coverage, and vigorous advocacy of extremely able and deeply-staffed defense counsel. … And **they did their work efficiently, with minimal duplication, and maximum effectiveness.**

> **I was careful to choose attorneys who have great ability [and] great reputation… And I think you've undertaken the representation of these people, you've done an excellent job, you've reached a settlement that I think is fair and in their benefit .**

Honorable C. Weston Houck

In re Force Protection Sec. Litig., 2:08-cv-845 CWH (D.S.C.)
($24 million settlement)

In re Philip Servs. Corp. Sec. Litig., 2007 U.S. Dist. LEXIS 101427, 13-14 (S.D.N.Y. Mar. 27, 2007) (Honorable Alvin K. Hellerstein). Similarly, in *Lernout & Hauspie Sec. Litig.*, Jeff was the lead attorney in securing over $180 million for defrauded investors. The action involved an accounting fraud of a company headquartered in both the United States and Belgium.

Recently, Jeff led a team of litigators, private investigators and a forensic accountant through a complex accounting fraud case. Jeff settled the case on terms extremely beneficial to the class, as recognized by the court. *See In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.).



JASON M. LEVITON

Partner

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EDUCATION

- Georgetown University Law Center, LL.M., Securities and Financial Regulations - Dean's Award (1 of 6)
- Gonzaga University School of Law, J.D., *cum laude*, Moot Court Council, International Law Review
- Gonzaga University, B.A., Philosophy and Political Science

BAR ADMISSIONS

- Massachusetts
- District of Columbia
- Washington (voluntarily inactive)
- Florida (voluntarily inactive)

COURT ADMISSIONS

- First Circuit Court of Appeals
- D. Mass.
- D. D.C.
- W.D. Wash.

PUBLICATIONS | SPEAKING EVENTS

- Guest on Rights Radio
- Law360 Securities Law Editorial Advisory Board
- SEC Litigation Release No. 18638, primary author
- Contributor, After the Ball is Over: Investor Remedies in the Wake of the Dot-Com Crash and Recent Scandals, Nebraska Law Review,
- 2005
- Speaker at Georgetown University Law Center on prosecution of securities class action lawsuits
- Presenter at Business Law Symposium entitled Shareholder Rights: An Idea Whose Time has Come, November 2013
- Presenter at National Conference on Public Employee Retirement Systems

Mr. Jason Leviton is a co-founding partner of Block & Leviton and focuses his practice on investor protection and shareholder rights matters. He serves as Co-Chair of the Firm's New Case Investigation and Monitoring Team and Chair of the Merger and Acquisition Litigation Team. In 2011 and each year thereafter, Jason was named a Super Lawyer or Rising Star by Massachusetts Super Lawyers, an honor given to only 3% of all lawyers in the Commonwealth. Jason also has a Martindale-Hubbell AV Preeminent Rating. In 2014, Jason was named as a Top 100 Trial Lawyer by the National Trial Lawyer Association. After receiving his law degree, Jason attended the Georgetown University Law Center and received a Master of Laws (LL.M.) in Securities and Financial Regulation (Dean's Award, 1 of 6). During that time, he was the inaugural LL.M. student selected for an externship with the S.E.C., Enforcement Division. Jason is now a member of the Association of Securities and Exchange Commission Alumni.

Currently, Jason represents several Ohio Pension Funds against BP following the largest oil spill in United States history. *See In re BP plc Securities Litigation*, Case No. 10-cv-2185 (S.D. Tex.) (settled for $175 million). He also served as co-lead counsel in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, Case No. CIV523789 (Cal. Sup. Ct) (settled for $30 million).

Jason has been named lead or co-lead counsel in numerous class actions, including: *In re Plains Exploration & Production Co. Stockholder Litig.*, Case No. 8090-VCN (Del. Ch.) (litigation led to an increase of approximately $400 million to the original merger amount); *In re Rentrak Shareholders Litig.*, No. 15CV27429 (Ore. Sup.) ($19 million settlement); *In re Cybex Int'l Shareholders Litig.*, Case No. 653794/2012 (N.Y. Sup. Ct) (settlement involved substantial dividend payment to shareholders)

Jason has achieved significant recoveries on behalf of class members, including but not limited to: *In re Empire State Realty Trust, Inc. Investor Litigation*, Case No. 650607/2012 (settled for $55 million); *In re KIT Digital, Inc. Securities Litigation*, Case No. 12-04199 (S.D.N.Y.) (settled for more than $6 million following the company's voluntary petition for bankruptcy); *In re Swisher Hygiene, Inc. Sec. and Deriv. Litig.*, MDL No. 3:12-MD-2384-GCM (W.D.N.C) (settled for nearly 40% of all cognizable damages); and *Brockton Retirement Board and City of Quincy Contributory Retirement Systems v. Oppenheimer Global Resource Private Equity Fund I, L.P., et al.*, Case No. 1:12-cv-10552 (D. Mass.) (settled for numerous improvements to Oppenheimer's corporate governance structure regarding the valuation of assets).

In addition to his class action experiences, Jason has litigated other forms of complex litigation. For instance, he worked with a former State of New York Attorney General in the defense of an attorney accused of insider trading, which included a criminal referral to the United States Department of Justice.

He was also heavily involved in the representation of four detainees being held at the Guantánamo Bay Naval Station in Cuba. Moreover, Jason has represented former employee whistleblowers before the S.E.C. where, in one instance, he successfully argued that his clients should receive the maximum whistleblower award of 30% pursuant to the Dodd-Frank Act, which equated to nearly $1 million. He also represented the same whistleblower in a retaliation claim against several Oppenheimer-related entities. *See John Doe v. Oppenheimer Asset Management, Inc., et al.*, Case No. 1:14-cv-00779-LAP (S.D.N.Y.).

Jason also has considerable experience litigating consumer class action cases involving deceptive business practices. For example, Jason, as co-lead counsel, successfully recovered 100% of the class's alleged damages stemming from the overcharging of scooped coffee beans at Starbucks stores throughout the country. *See In re Starbucks Consumer Litig.*, Case No. 2:11-cv-01985-MJP (W.D. Wa.).

Prior to forming Block & Leviton, Jason was an attorney at three other preeminent class action firms. There, he was instrumental in recovering $10.5 million in the *Welmon v. Chicago Bridge & Iron*, Case No. 06-cv- 01283, securities class action litigation. In that case, Jason represented Fortis Investments, a major European asset management company and, in addition to the monetary settlement, was able to institute several corporate governance changes at the company. In granting the Chicago Bridge & Iron settlement, the Honorable John Sprizzo stated that **"Plaintiffs' counsel have conducted the litigation and achieved the settlement with skill, perserversance and diligent advocacy."** *Chicago Bridge & Iron* (June 3, 2008).

Moreover, in the *Ong v. Sears Roebuck & Co.*, Case No. 03 C 4142 (N.D. Ill.), securities class action, Jason represented the State Universities Retirement System of Illinois (SURS) and helped settle the action for $15.5 million. He also represented the Iowa Public Employees' Retirement System, the Policemen's Annuity & Benefit Fund of Chicago, the Central States, Southeast and Southwest Areas Pension Fund in the securities class action against MF Global that settled for $90.0 million. *Rubin v. MF Global, LTD., et al.*, Case No. 08-cv- 02233 (S.D.N.Y.). Likewise, he was a member of the *In re VeriSign Securities Litigation*, Case No. C-02-2270 (N.D. Cal.) team that recovered more than $78.0 million for investors.

> **The settlement is – gosh. . . . the fact that it's occurring within the context of a securities case, which is very difficult for plaintiffs to win, is extremely impressive to me. . . . [T]his is a matter which has been fairly litigated by people.**
>
> **Honorable Graham C. Mullen,**
>
> *In re Swisher Hygiene, Inc., Securities and Derivative Litig.,* 3:12-md-2384 GCM (W.D.N.C.) ($5.5 million settlement)



WHITNEY E. STREET

Partner

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EDUCATION

- University of Virginia School of Law, J.D.
- University of Virginia, B.A., Economics and Literature

BAR ADMISSIONS

- California
- New York
- Massachusetts
- Texas

COURT ADMISSIONS

- N.D. Cal. and E.D. Cal.
- S.D.N.Y. and E.D.N.Y.
- D. Mass.

PROFESSIONAL ACTIVITIES

- Founder and former Co-Chair of the AAJ Antitrust Litigation Group
- Member of the Steering Committee for the Complex Litigation E-Discovery Forum

PUBLICATIONS | SPEAKING EVENTS

- Moderator, Introduction to the Use of Regression Analysis in Antitrust Class Action Litigation, American Association for Justice Webinar (August 2016)
- Co-Author, What Lies Ahead in High Stakes Pay-For-Delay Antitrust Litigation, American Association of Justice Business Torts Newsletter (May 2015)
- Author, Technology Assisted Review: the Disclosure of Training Sets and Related Transparency Issues, Georgetown Law Advanced eDiscovery Institute (Fall 2014)
- Faculty, Georgetown University Law Advanced eDiscovery Institute (November 2014)
- Co-Author, Decision Re-Affirms Critical Role of Shareholders Benefits and Pensions Monitor (October 2014)

Block & Leviton Partner Whitney Street has over fifteen years of complex litigation experience and significant expertise in antitrust and securities class action litigation. Whitney, who serves as Chair of the Firm's Competition Law Group, was appointed Co-Lead Counsel on behalf of a class of indirect purchasers in *In re Domestic Drywall Antitrust Litig.,* 13- md-02437 (E.D.Pa.), which involved allegations of price fixing and other forms of concerted conduct in violation of the antitrust laws. Whitney recovered approximately $17 million on behalf of the class of indirect purchasers in that action.

In addition, Whitney represents the City of Providence and a class of indirect purchasers in an antitrust class action suit against Celgene Corp. for unlawfully excluding generic competition for vital cancer treatment drugs. See *In re Thalomid and Revlimid Antitrust Litig.*, 14-cv-06997 (D.N.J.). Whitney was also appointed to the Plaintiffs' Steering Committee in *In re Packaged Seafood Antitrust Litig.,* 15-md-02670 (S.D.Cal.) (alleging price fixing in the market for shelf-stable seafood products) and in *In re Liquid Aluminum Sulfate Antitrust Litig.,* 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and price fixing in the market for aluminum sulfate). Whitney is also a member of the litigation team representing direct purchasers in *In re Broiler Chicken Antitrust Litig.,* No. 16-cv-8637 (N.D.Ill.), a class action alleging that broiler chicken producers engaged in a price fixing conspiracy.

Whitney was also an integral part of the litigation teams in the following antitrust class actions: *Air Cargo Shipping Services Antitrust Litigation,* 06-md-1775 (E.D.N.Y.) (settlements totaling more than $270.0 million); *In re: Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation*, 3:03-md-1542 (D. Conn.) (partial settlements totaling $87.0 million); *In re: Methyl Methacrylate (MMA) Antitrust Litigation,* 06-md-01768 (E.D. Pa.) (settled for $15.0 million); and *In re: Hydrogen Peroxide Antitrust Litigation*, 05-civ-666 (E.D. Pa.) (partial settlements of more than $4.0 million).

Whitney received her training at prominent litigation firms in New York and Boston where she represented clients in antitrust and securities class actions. She began her career at Pillsbury Winthrop Shaw Pittman, one of the largest law firms in California.

R. JOSEPH BARTON
Partner

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EDUCATION

- College of William & Mary, Marshall-Wythe Law School, J.D.
- College of William & Mary, B.A., History and Classical Studies

BAR ADMISSIONS

- California
- District of Columbia

COURT ADMISSIONS

- Second, Fourth, Fifth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuit Courts of Appeal
- D.D.C.
- N.D. Cal., C.D. Cal., and S.D. Cal.
- D. Md.
- N.D. Tex. and W.D. Tex.
- N.D. Ill.

PROFESSIONAL ACTIVITIES

- Co-Chair of the Civil Procedure Subcommittee for the ABA Employee Benefits Committee
- Co-Chair of AAJ
- Chair of Employment Rights Section of the AAJ from 2013 to 2014

R. Joseph Barton is the Chair of the Firm's Employee Benefits Group and the Firm's Veterans/Servicemember Rights Group at the Firm. Joe has more than 15 years experience handling a diverse array of complex and class litigation. Joe has a Martindale-Hubbell AV Preeminent Rating, has been selected every year since 2013 as a Washington, D.C. Super Lawyer, has a 10.0 rating from Avvo, and is listed in the Marquis' Who's Who in American Law.

Notable ERISA Cases

Over the last 15 years, Joe has handled a wide variety of employee benefit (i.e. ERISA) cases. He has been trial counsel in four ERISA cases. He was lead trial counsel in a case challenging a complex transaction involving the Trachte ESOP and the Alliance ESOP on behalf of a class of employees of *Trachte, Chesemore v. Alliance Holdings, Inc.*, No. 3:09-cv-00413 (W.D. Wis.). In that case, Joe obtained a favorable trial decisions on a liability and remedies of $17.2 million (plus prejudgment interest) for the Class which was affirmed by the Seventh Circuit. In *Severstal Wheeling Inc. Ret. Comm. v. WPN Corporation*, No. 10-cv-954 (S.D.N.Y.), Joe was lead trial counsel representing the fiduciaries of two pension plan suing their former investment manager for improper investments and obtained a judgment for plaintiffs of over $15 million which was affirmed by the Second Circuit.

Joe is among a handful of lawyers who regularly represent participants in litigation involving ESOPs holding privately held stock. In addition to the Alliance/Trachte ESOP litigation, Joe has litigated and is litigating a number of private ESOP cases, including the Jeld-Wen ESOP, the Tharaldson Motels, Inc. ESOP and, the Azon Corporation ESOP.

Joe has also been involved in a number of cases involving breaches of fiduciary duty and self-dealing, including improperly investing 401k plan assets in artificially inflated stock of publicly traded companies, in improper and risky investments such as hedge funds or private equity. He litigated one of the earliest cases challenging the prudence of investment and fees of the pension and 401k plans sponsored by New York Life Insurance Company.

Joe has also litigated cases involving the failure to properly pay benefits. In *Slipchenko v. Brunel*, No. 4-11-cv- 01465 (S.D. Tex.), Joe obtained a settlement in a COBRA class action which resulted in the largest per classmember recovery in any reported COBRA class action. In *Simpson v. Fireman's Fund Insurance Company* (N.D. Cal.), Joe represented a class employees alleging that FFIC's policy of terminated persons on disability violated the discrimination provisions of ERISA, and obtained a settlement restoring their right to benefits for a period of years and also reimbursement of past expenses.

Notable Cases Involving Veterans & Servicemembers

In cases involving the rights of veterans and servicemembers,Joe is proud to have achieved results which one court described as "outstanding, worthy of being emulated by class representatives and counsel in other comparable litigation." In that case, *Tuten v. United Airlines*, No. 12-cv-1561-WJM-MEH (D. Col.), he was lead counsel for a class of United Airlines Pilots alleging USERRA violations in connection with their pension contributions. The case was settled for an amount that provided the Class with 100% of their actual damages.

In *Bush v. Liberty Life Assurance Co.*, Joe was lead class counsel on behalf of a class participants whose long term disability benefits were insured by Liberty Life alleging that those benefits should not have been reduced by the amount of benefits provided through the Department of Veterans Affairs. As part of the settlement, Liberty Life agreed to return 60% of the monies imposed as offsets and to cease imposing such reductions/offsets unless and until the state departments of insurance had approved them.

Notable Cases Involving Veterans & Servicemembers

Joe considers pro bono representation an important part of his practice and has represented clients in actions concerning their employer's failure to pay wages and/or overtime. In one such case, the Judge in D.C. Superior Court described Mr. Barton's representation as follows: **"everything done on behalf of the Plaintiff has been professional, timely and thorough."**



JOEL FLEMING

Partner

joel@blockesq.com

EDUCATION

- Harvard Law School, J.D., *cum laude*
- Wilfrid Laurier University, B.A., Political Science with high distinction

BAR ADMISSIONS

- California
- Massachusetts

COURT ADMISSIONS

- First and Ninth Circuit Courts of Appeal
- N.D. Cal. and C.D. Cal.
- D. Mass.

PUBLICATIONS

- Co-author, Decision Re-Affirms Critical Role of Shareholders, Benefits and Pensions Monitor (October 2014)
- Co-author, Meltdowns crank up muni-bond litigation, Daily Journal (September 18, 2013)
- Co-author, SEC takes hard line on 'cyber incidents', Daily Journal (April 5, 2013)
- Co-author, Lower Courts Interpret The Supreme Court's Decision In Janus Capital Group, Inc. v. First Derivative Traders, Financial Fraud Law Report 4:5 (May 2012)

PROFESSIONAL ACTIVITIES

- Visiting Lecturer, Tufts University: Experimental College (2013-2015)

Block & Leviton Partner Joel Fleming has significant experience in shareholder litigation. Since graduating with honors from the Harvard Law School, Joel has spent his entire career practicing shareholder litigation and has been recognized as a "Rising Star" in securities litigation by Super Lawyers magazine for four years in a row.

Joel was a lead attorney for Block & Leviton in *In re Rentrak Corporation Shareholders Litigation*, No. 15CV27429, which resulted in a $19 million settlement for a class of former shareholders of Rentrak Corporation. This is believed to be largest settlement of merger litigation in Oregon state court history. It was also one of the top five largest settlements, since 2010, of merger litigation arising from transactions valued at less than $1 billion.

Joel was also the lead associate in *Vladimir Gusinsky Living Trust v. Berman*, No. 2:14-01420-JAK (C.D. Cal.), a derivative action on behalf of Jakks Pacific, Inc., which resulted in a settlement that imposed significant corporate governance reforms, valued by expert testimony as worth $20 to $40 million to the company.

Joel is currently serving as one of the lead attorneys in litigation challenging a conflicted transaction between Reynolds American and its largest shareholder, British American Tobacco: a $4.7 billion share issuance to British American Tobacco at a below-market price. In December 2016, in a question of first impression, the North Carolina Court of Appeals held in favor of the putative class represented by Block & Leviton, finding that Plaintiffs had adequately pled that British American Tobacco was a controlling shareholder and owed a fiduciary duty to public shareholders. *Corwin v. British Am. Tobacco PLC*, 796 S.E.2d 324, 327 (N.C. Ct. App. 2016).

Joel also serves as a lead attorney for a putative class of Charter Communications shareholders, challenging an unfair share issuance to Charter's controlling shareholders, Liberty Broadband and John Malone, in connection with Charter's purchase of Time Warner Cable and Bright House Networks. In May 2017, the Delaware Chancery Court held that plaintiffs had adequately pled that the stockholder vote to approve the share issuance was "structurally coercive." *Sciabacucchi v. Liberty Broadband Corporation*, No. CV 11418-VCG, 2017 WL 2352152, at *3 (Del. Ch. May 31, 2017).

Prior to joining the firm, Joel was a member of the Securities Litigation and Enforcement group at Wilmer Cutler Pickering Hale and Dorr—a large defense firm headquartered in Boston and Washington, D.C. While at WilmerHale, he served as a member of the trial team in AATI v. Skyworks, the first-ever arbitration to go to trial before the Delaware Chancery Court, in a case involving a merger-related dispute between two companies in the high technology industry. Joel represented both companies in a subsequent shareholder class action that ended with the dismissal with prejudice of all counts.



JACOB WALKER

Partner

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EDUCATION

- University of Michigan Law School, J.D., *cum laude*
- Babson College, B.S., Business Administration

BAR ADMISSIONS

- Massachusetts
- California

COURT ADMISSIONS

- Supreme Court
- First and Ninth Circuit Courts of Appeal
- D. Mass.
- N.D. Cal. and C.D. Cal.

PROFESSIONAL CERTIFICATIONS

- Certified Information Privacy Professional (CIPP/US)

PUBLICATIONS

- Co-author, PLI's Securities Litigation treatise – chapters on loss causation and securities trials

Among other cases, Jake is currently the lead associate in *In re EZCORP Securities Litigation* (W.D. Tex.), and *Budde v. Global Power Equipment Inc.*, (N.D. Tex.), both federal securities fraud class actions involving accounting restatements and financial misrepresentations. Jake served as a lead associate in *In re Atossa Genetics, Inc.*, and *In re Amicus Therapeutics Securities Litigation* (D. N.J.), both securities fraud class actions concerning misrepresentations made to investors about the companies' interactions with the Food and Drug Administration. Both Atossa and Amicus resulted in favorable settlements for shareholder class members. Jake has also worked on litigation involving the private equity-buyout of a health and fitness chain with substantial real estate assets, *In re Lifetime Fitness Shareholder Litigation* (D. Minn.), which is currently on appeal to the Eighth Circuit.

Recently, Jake obtained a settlement for Massachusetts customers of Gate House Media newspaper subscriptions, estimated to exceed $2 million in total value. Jake was also a key member of the team that represented the Louisiana Municipal Police Employees' Retirement System in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, (Cal. Sup. Ct.), obtaining a $30 million settlement for shareholders in a matter arising out of Onyx's $11-billion-dollar merger with Amgen.

Prior to joining Block & Leviton in 2015, Jake was an associate at two of the country's top defense firms; Gibson Dunn in Palo Alto and Skadden, Arps in Boston. There, he represented boards of directors, corporate acquisition targets, and acquirers in litigation related to mergers and acquisitions. For example, Jake represented defendants in litigation related to the $5.3 billion private equity acquisition of Del Monte Foods Company in state and federal courts in California and in the Delaware Court of Chancery, as well as in litigation related to Intel's $7.7 billion acquisition of McAfee Inc. in the Superior Court of California, Santa Clara County. He has also represented numerous third-parties, including various investment banks, in M&A litigation in California and Delaware courts.

While Jake's eight-year career has centered on securities and corporate governance litigation, Jake also has significant experience representing several large technology companies, including in the defense of consumer class actions related to privacy and technology issues. He is a Certified Information Privacy Professional and has a deep understanding of technology and privacy issues. Jake has also represented companies in antitrust class actions and investigations, stockholder derivative actions, securities class actions, and in investigations before the F.T.C. and the Massachusetts Attorney General's office.

Jake has been named a "Rising Star" in securities litigation by Massachusetts Super Lawyers for three years in a row (2016-2018).

VINCENT CHENG
Senior Associate

vincent@blockesq.com

EDUCATION

- University of California Berkeley School of Law, J.D.
- University of California, Berkeley, B.A., Philosophy and Mathematics

BAR ADMISSIONS

- California

PUBLICATIONS

- Author, "National Railroad Passenger Corporation v. Morgan: A Problematic Formulation of the Continuing Violation Theory," California Law Review (October 2003)

Vincent Cheng is an associate at the firm and a member of the Employee Benefits Group and Veterans/Servicemember Rights Group. Since graduating from law school, Vincent has focused his work on advocating for the rights of employees and retirees and of veterans and servicemembers. Prior to joining Block & Leviton, he had over 8 years of experience in litigating a variety of lawsuits on behalf of employees. These lawsuits included cases brought under the Employee Retirement Income Security Act (ERISA) involving breach of fiduciary duty and benefit denial claims and cases brought under the Uniformed Services Employment and Reemployment Rights Act (USERRA) involving veterans' employment rights and benefits, as well as employment cases involving unpaid overtime wages under the Fair Labor Standards Act and the California Labor Code and race and gender discrimination under Title VII and the California Fair Employment and Housing Act (FEHA).

Notable Employee Benefits Cases

- *Carlson v. Northrop Grumman Severance Plan*, No. 13-cv-02635 (N.D. Ill.): represent a putative class of employees who were laid off from Northrop Grumman alleging that they improperly denied cash severance under the severance Plan.

- *Aguilar v. Melkonian Enterprises, Inc.*, No. 05-cv-00032 (E.D. Cal.): represented a class of participants in two pension plans alleging that the fiduciaries failed to prudently invest the plan assets; obtained a settlement that provided for recovery of more than 85% of the losses to the plans.

- *Simpson v. Fireman's Fund Insurance Company*, No. C05- 000225 (N.D. Cal.): represented disabled employee-participants alleging that FFIC terminated them in violation of ERISA § 510 to prevent them from continuing to receive medical benefits; obtained a settlement that provided for restoration of their right to benefits for a period of years and reimbursement of past medical expenses.

- *Paulsen v. CNF Inc.*, No. C 03-3960 (N.D. Cal.): represented a group of employees alleging that the fiduciaries breached their duties under ERISA in connection with the spinoff of a division of CNF, and that the CNF pension plan's actuary breached its duty of care under state law in valuing the plan liabilities to be transferred at spinoff and certifying postspinoff that the new plan was adequately funded.

- *Hurlic v. Southern California Gas Company*, No. 05-5027 (C.D. Cal.): represented a group of participants alleging that the pension benefit accrual formula under SCGC's cash balance defined benefit plan violated ERISA's prohibition against age discrimination and ERISA's anti-backloading rules.

Notable Cases Involving Veterans and Servicemembers Rights

- *Allman v. American Airlines, Inc. Pilot Retirement Benefit Program Variable Income Plan*, No. 14-cv- 10138 (D. Mass.), where American Airlines allegedly violated USERRA and ERISA by making deficient pension contributions for a class of pilots who took military leave.

- *Bush v. Liberty Life Assurance Company of Boston*, No. 14-cv-01507 (N.D. Cal.), where Liberty Life agreed to return significant portions of reduced long-term disability benefits to veteran-claimants and not to reduce future benefits absent state approval.

- *Munoz v. InGenesis STGi Partners, LLC*, No. 14-cv-1547 (S.D. Cal.), a USERRA discrimination and failure-to-reemploy case where we obtained through settlement the full

Notable Employment Cases

- *Gutierrez v. Schmid Insulation Contractors, Inc.*, No. 07-cv-5852 (C.D. Cal.), a wage-and-hour class action alleging that the defendants failed to pay for travel time from offices to construction sites, provide meal and rest breaks, and pay overtime to a group of Spanish-speaking, immigrant workers.

- *Wynne v. McCormick & Schmick's Seafood Restaurants, Inc.*, 06-cv-03153 (N.D. Cal.), a Title VII and FEHA class action alleging race discrimination in hiring and job assignments, which resulted in a consent decree through settlement that provided for significant injunctive relief to promote equal employment opportunity in defendants' employment practices.

- *Holloway v. Best Buy Co., Inc.*, No. 05-5056 (N.D. Cal.), a Title VII and FEHA class action alleging raceand gender discrimination by Best Buy in hiring, promotions, and job assignments.



STEPHEN TETI

Senior Associate

steti@blockesq.com

EDUCATION

- Quinnipiac University School of Law, J.D., *magna cum laude*
- Fairfield University, B.A., Political Science and French, *cum laude*

BAR ADMISSIONS

- Massachusetts
- Connecticut

COURT ADMISSIONS

- Ninth Circuit Court of Appeals
- D. Mass.
- D. Conn.
- D. Colo.
- S.D.N.Y. and W.D.N.Y.

Stephen Teti is a senior associate at Block & Leviton LLP, focusing his practice on antitrust litigation. Steve's antitrust matters include *In re Thalomid & Revlimid Antitrust Litigation,* No. 14-cv-6997 (D.N.J.), a class action alleging that the defendant's extensive anticompetitive conduct excluded generic alternatives for Thalomid and Revlimid, two drugs used to treat rare but deadly conditions, from entering the market, causing end payors to incur millions of dollars in overcharges. Steve is also a member of the team representing direct purchasers in *In re Broiler Chicken Antitrust Litig.,* No. 16-cv-8637 (N.D. Ill.), a class action alleging that broiler chicken producers engaged in a price fixing conspiracy.

Steve joined Block & Leviton after practicing securities, derivative, and consumer class litigation for six years at a nationally-recognized plaintiffs' law firm in Connecticut. He previously clerked for the judges of the Connecticut Superior Court. During law school, Steve served as Publications Editor of the Quinnipiac Law Review, a judicial extern to the Honorable Stefan R. Underhill in the United States District Court for the District of Connecticut, an intern for the State of Connecticut Office of the Attorney General, and as a legislative extern to the Judiciary Committee of the Connecticut General Assembly.

Notable Cases

- Obtained a significant decision for consumers in *Friedman v. Maspeth Fed. Loan & Savings Ass'n*, 30 F. Supp. 3d 183 (E.D.N.Y. 2014). In a case before the Honorable Jack B. Weinstein, raising "issues of first impression on the reach of the Real Estate Settlement Procedures Act," Steve defeated a motion to dismiss, and later obtained a settlement that reimbursed consumers for 100% of their losses in the case which involved wrongful imposition of late charges on timely received mortgage payments;

- Lead associate in cases achieving notable recoveries under the Securities Act of 1933, including *City of Birmingham Retirement & Relief System v. MetLife, Inc.*, Case No. CV-2012-902101 (Ala. Cir. Ct.) ($9.75 million settlement); *Rosenberg v. Cliffs Natural Resources, Inc.*, No. 2014 CV 828140 (Ohio Ct. Com. Pleas) ($10 million settlement); and *Niitsoo v. Alpha Natural Resources, Inc.*, No. AD-303-2014 (Pa. Ct. Com. Pleas) ($3.6 million settlement);

- Lead associate in several successful appeals, including *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Retirement System v. Parkinson*, 737 F.3d 719 (7th Cir. 2013); and *Chavez v. Nestlé USA, Inc.*, 511 Fed. Appx. 606 (9th Cir. 2013);

- Achieved several favorable decisions regarding the improper removal of class actions under the Securities Act of 1933, including *Niitsoo v. Alpha Natural Resources, Inc.*, 902 F. Supp. 2d 797 (S.D. W. Va. 2012); *Rosenberg v. Cliffs Natural Resources, Inc.*, 2015 WL 1534033 (N.D. Ohio Mar. 25, 2015); and *Rajasekaran v. CytRx Corp.*, 2014 WL 4330787 (C.D. Cal. Aug. 21, 2014);

- Represented banks and other financial institutions in *In re Home Depot Inc. Customer Data Security Breach Litig.*, 14-md-2583 (N.D. Ga.) (served on Plaintiffs' Coordination & Discovery Committee); *In re Target Corp. Customer Data Security Breach Litig.*, 14-md-2522 (D. Minn.); and *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv 2228 (N.D. Ill.)

DAN DEMARIA
Senior Associate

dan@blockesq.com

EDUCATION

- University of Western Ontario, J.D.
- University of Calgary, B.A., Political Science
- Canadian Securities Course

BAR ADMISSIONS

- D. Mass

Dan DeMaria is a senior associate at Block & Leviton LLP. He handles case and client development for the firm.

Dan has established himself as a distinguished trial lawyer. He has been lead counsel at trial in five federal cases, and has handled a number of federal appeals. In 2017, he won a landmark decision in *United States v. Jenkins,* 854 F.3d 181 (2d Cir. 2017). Prior to joining the firm, Dan's practice included class action securities litigation, tobacco litigation, and products liability cases.

In 2014, Dan was named "Top 40 Under 40" by the National Trial Lawyers Association, and in 2015 he was named a "Top 100 Trial Lawyer".



NATE SILVER

Associate

nate@blockesq.com

EDUCATION

- Boston College Law School, J.D., *magna cum laude*
- Suffolk University, B.A., History, *magna cum laude*

BAR ADMISSIONS

- Massachusetts
- New York

COURT ADMISSIONS

- First Circuit Court of Appeals
- D. Mass

PUBLICATIONS

- Contributing author to Massachusetts Evidence: A Courtroom Reference (MCLE)

Nate Silver is an associate at Block & Leviton LLP, focusing his practice on securities litigation. Nate recently joined Block & Leviton from the Boston firm of J. W. Carney, Jr. & Associates, LLC, where he practiced criminal defense and appeals in state and federal court.

Nate also represented indigent individuals accused of crimes in state court as a member of Middlesex Defense Attorneys, Inc., a non-profit organization that administers criminal defense services to those who cannot afford legal services. While attending law school, Nate served as a senior editor for the Boston College Law Review.

COLIN M. DOWNES
Associate

colin@blockesq.com

EDUCATION

- University of Virginia School of Law, J.D
- University of Massachusetts, B.A., Philosophy

BAR ADMISSIONS

- District of Columbia
- New York

PUBLICATIONS

- *Appointing Chapter 11 Trustees in Reorganizations of Religious Institutions,* 101 Va. L. Rev. 2225 (2015)

Colin M. Downes is an associate with the firm who focuses his practice on defending the rights and benefits of workers and retirees. His experience includes cases brought under the Employee Retirement Income Security Act (ERISA) involving employee stock ownership plans, excessive 401k and 403b fees, pension plan underfunding, and the ERISA obligations of religiously affiliated nonprofits. He has also provided pro bono representation to indigent clients in contested asylum and child custody matters.

Prior to joining the firm, Colin practiced as an associate with Groom Law Group (an employer-side employment benefits boutique) and with the international law firm Clifford Chance. Colin served on the editorial board of the Virginia Law Review while in law school.

MATTHEW SMITH
Associate

matt@blockesq.com

EDUCATION

- Duke Law School, J.D., L.L.M, *magna cum laude* & Order of the Coif
- Columbia University, B.A., History

BAR ADMISSIONS

- California
- New York (inactive)
- District of Columbia (inactive)

COURT ADMISSIONS

- Second and Third Circuit Court of Appeals
- N.D. Cal. and C.D. Cal.
- E.D. Mich.
- D. Colo.

Matt is an associate in the Firm's Employee Benefits practices. After graduating magna cum laude from Duke Law School, Matt served as a law clerk to the Honorable Rosemary Barkett on the Eleventh Circuit Court of Appeals.

Before joining Block and Leviton, Matt practiced at nationally recognized plaintiffs' firms based in Washington, D.C., and Seattle, Washington, where his practice concentrated on antitrust and employee benefits cases. Matt collaborated with R. Joe Barton in *Severstal Wheeling, Inc. Retirement Committee et al. v. WPN Corp., et. al. (*2d. Circuit). As part of a two-attorney trial team, they won a $15 million judgment on behalf of thousands of retired steelworkers. Matt has valuable experience serving as lead associate in a myriad of successful litigation, ranging from cases where military veterans were wrongfully denied long-term disability benefits (*Bush v. Liberty Life Assurance Co. of Boston et. al.* (N.D. Cal.)), to nationally-contested issues of federal pension regulation (*Kaplan v. Saint Peter's Healthcare System, et. al.* (3d Circuit)).



AMANDA R. CRAWFORD

Associate

amanda@blockesq.com

EDUCATION

- University of North Carolina School of Law, J.D.
- Eugene Gressman and Daniel H. Pollitt Oral Advocacy Award for Best Overall Argument
- Certificate of Merit for highest grade in Legal Research, Reasoning, Writing, and Advocacy
- California State University, Fullerton, Criminal Justice, *cum laude*

BAR ADMISSIONS

- Massachusetts

COURT ADMISSIONS

- D. Mass

Amanda Crawford is an associate in Block & Leviton LLP's shareholder litigation practice.

Before joining Block & Leviton, Amanda gained practical corporate work experience in finance and employment law. During law school, she served as Executive Editor of the North Carolina Journal of International Law, Cochair of the Craven Moot Court Board, a research assistant to the Assistant Dean of the Writing and Learning Resources at UNC School of law, a law clerk at TIAA, and a summer associate at Mayer Brown LLP.



JEFFREY GRAY

Associate

jgray@blockesq.com

EDUCATION

- Suffolk University Law School, J.D.
- Sawyer Business School, Suffolk University, M.B.A.
- Connecticut College, B.A., Economics

BAR ADMISSIONS

- Massachusetts

Jeff Gray joined Block & Leviton as an associate in 2016, where his practice focuses on consumer class action litigation. Jeff is experienced in conducting large scale document review projects.

Jeff is a member of the Block & Leviton LLP litigation team representing members of the class in the matter *Volkswagen "Clean Diesel" MDL*. Prior to joining Block & Leviton, Jeff also received valuable experience with class action shareholder suits, breach of contract cases, and defense of trademark infringement claims, as well as SEC and DOJ investigations of pharmaceutical companies and hedge funds.

Earlier in his career, Jeff was a management consultant at a financial services firm in the Boston area and, prior to that, was a project manager in commercial lending at FleetBoston Financial. While in law school, he completed internships with MFS and with The Nature Conservancy and was a law clerk at CT Corporation System.

ELIZABETH NEWMAN

Associate

enewman@blockesq.com

EDUCATION

- Golden Gate University School of Law, J.D., Business Law Concentration
- University of California, Berkeley, B.A., History

BAR ADMISSIONS

- California

COURT ADMISSIONS

- E.D. Cal.

Elizabeth Newman joined Block & Leviton LLP as an Associate in 2018. Her practice focuses on securities, antitrust, and class action litigation. She is currently a member of the litigation team representing shareholders in the *In re McKesson Corporation Derivative Litigation* matter. Prior to joining Block & Leviton LLP, Elizabeth was a member of litigation teams on numerous cases including: *In Re TFT-LCD (Flat Panel) Antitrust Litigation*, M-07-1827 SI, MDL 1827 (N.D.Cal.) (alleging price fixing of TFT panels, resulting in approximately $1.1 billion in settlements); *In re Optical Disk Drive Products Antitrust Litigation,* M:10-cv-2143-RS (N.D.Cal.) (alleging price fixing of electronic components used in DVDs, Blu-rays and CDs, resulting in $37 million in settlements); *In re Lithium Ion Batteries Antitrust Litigation,* 13-md-02420-YGR (DMR) (N.D.Cal.) (alleging price fixing of Li-Ion batteries, resulting in $64.45 million in settlements to date); *Hamilton v. Barnes, et al.* (Advanced Micro Devices), 4:15-cv-01890-YGR (N.D.Cal.) (alleging false and misleading statements and omissions, resulting in a $29.5 million settlement); *In re Apple Iphone/Ipod Warranty Litigation,* CV-10-01610 (N.D.Cal.) (alleging failure to honor warranties, resulting in a $53 million settlement); *In re Anthem Inc. Data Breach Litigation*, 15-MD-02617-LHK (N.D.Cal.) (alleging a data security breach compromising the records of 79 million members, and resulting in a $115 million settlement).

While in law school, Elizabeth received the Witkin Award for Securities Regulation, the CALI Award for Appellate Advocacy, the CALI Award for Contracts II, and was a member of the Moot Court Board. Prior to her legal career, Elizabeth worked in Contracts and Licensing at Oracle Corporation.

Contact Us

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EXHIBIT B

BLOCK & LEVITON LLP'S EXPENSE REPORT

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
B C E IT
Reported Expenses Incurred on Behalf of IPPs

EX E E E T

C TE	**T I C ED**
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	$450.00
Federal Express	$14.00
Hearing Transcripts	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	$110.00
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	$1,479.20
Telephone/Telecopier	$89.02
Travel	$307.09
Miscellaneous	
T T	$52,449.31

EXHIBIT 9

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whitney@blockesq.com
Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF WHITNEY E. STREET IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BLOCK & LEVITON LLP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Whitney E. Street, declare:

1. I am a partner at Block & Leviton LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel for IPPs throughout the course of this litigation. The background and experience of Block & Leviton LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Block & Leviton LLP has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims

against the defendants. While Block & Leviton LLP devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation Block & Leviton LLP performed the following work: coordinated discovery of municipal plaintiffs, the City of Richmond and Palo Alto; defended client depositions; performed Korean and English language document review; assisted with factual research for IPPs' expert reports; assisted with preparation for depositions of Defendants' expert witnesses; and, performed legal research and drafting related to reply in support of IPPs' motion for class certification.

5. Attached hereto as **Exhibit B** is a billing summary of Block & Leviton LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Block & Leviton LLP during this period of time was 1,513.70, with a corresponding lodestar based on current rates of $697,196.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Block & Leviton LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Block & Leviton LLP has incurred during the course of this litigation. Block & Leviton LLP expended a total of $102,482.11 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Block & Leviton LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense

vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Block & Leviton LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 22, 2017 at Oakland, California.

/s/ Whitney E. Street

Whitney E. Street

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BLOCK & LEVITON LLP

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Fight for a level playing field. Block & Leviton believes investors, pensioners, consumers and employees deserve an advocate who will take a stand to protect their rights. We value our role not only in recovering our clients' immediate losses, but in protecting their long-term interests by helping to shape corporate policy. We genuinely enjoy our work, which each day offers an opportunity to tackle novel problems and unique challenges in a continuously evolving economy. We concur with Aristotle's observation that *pleasure in the job puts perfection in the work.* We believe this is reflected in our track record, which includes our ability to take a case to trial and win, as well as our appointment as lead or co-lead counsel in many dozens of high profile matters, including: *In re BP Securities Litig,*, Case No. 4:10-MD-02185 (S.D. Tex.) (settled for $175 million), *In re Google Class C Shareholder Litig.*, Case No. 7469-CS (Del. Ch.) (settled for $522 million) and *In re: Drywall Antirust Litigation*, Case No. 13-md-02437 (E.D. Pa.) (to date, settlements with 2 of 6 defendants totaling more than $10 million), and *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices and Products Liability Litig.*, Case No. 3:15-md-02672 (N.D. Cal.) (settled for approximately $15 billion). Our attorneys have successfully recovered billions for our clients and class members and have done so even under adverse conditions, including successfully litigating against bankrupt and foreign-based corporations.

Defy convention. Instrumental to our philosophy is the willingness to embrace new ways of seeing, and solving, our clients' problems. For example, we challenged Google Inc.'s plan to issue a new class of non-voting stock that threatened to diminish the value of minority investors' holdings in the company. With trial set to begin in less than two days, Block & Leviton brokered a settlement with Google Inc. and its directors that provided for a forward-looking payment ladder (valued at up to $7.5 billion) to protect minority investors against future diminution in their stock value. As a result of the payment ladder, shareholders ultimately recovered $522 million in cash and stock in May 2015. Appreciation of the fact that each of our clients has a unique viewpoint allows us to tailor our advice and representation accordingly to achieve superior results, and to do so with maximum efficiency.

Surround yourself with the best. The Firm credits its success to its entire team of extremely talented, dedicated attorneys, the majority of whom have significant litigation experience. An in-depth *curriculum vitae* highlighting each attorney's areas of expertise, unique experience, recognition in the field and education credentials follows.

JEFFREY C. BLOCK



Partner
Tel. 617-398-5600
Fax. 617-507-6020
Email. jeff@blockesq.com

EDUCATION

- Brooklyn Law School, J.D., *cum laude* 1986
- State University of New York, B.A., Political Science, *cum laude* 1983

BAR ADMISSIONS

- New York
- Massachusetts

COURT ADMISSIONS

- Southern District of New York
- Eastern District of New York
- District of Massachusetts
- United States Court of Appeals for the First, Second, Third, Ninth and Eleventh Circuits
- United States Supreme Court

PUBLICATIONS | SPEAKING EVENTS

- ALI-ABA Conference for Insurance and Financial Services Industry Litigation, July 2009, Lecturer and Panelist
- *Damages in Securities Litigation*, sponsored by Law Seminars International at the Harvard Club, Panelist
- *Litigation to Remedy Meltdown Damages: What Can Be Gained?*, Harvard Law School's Capital Matters Conference, Speaker
- Guest commentator on NBC
- International Strategies Recoveries for Foreign Investments, Post *Morrison*, San Francisco Bar Association, Panel Moderator

Mr. Block is a co-founding partner of Block & Leviton. With a career spanning thirty years, Mr. Block is recognized as one of the nation's preeminent class action attorneys and is recognize as a "Super Lawyer" by *Massachusetts Super Lawyers*. Mr. Block currently represents the Ohio Public Employees Retirement System in *In re: BP Sec. Litig.*, No. 4:10-MD-02185 (S.D. Tex.), charging that BP misled investors as to the amount of oil leaking from the Macondo well after the explosion aboard the *Deepwater Horizon* oil rig in the Gulf of Mexico in 2010. Mr. Block, on behalf of the plaintiffs, successfully argued against defendants' motions to dismiss, in favor of class certification, in opposition to summary judgment, and helped secure a settlement of $175 million for the class, which represents more than 60% of the class' actual losses. Mr. Block also represented the Brockton Retirement System in an action challenging Google's attempt to split its stock into voting and non-voting shares. *See In re Google, Inc. Class C S'holder Litig.*, case no. 7469-CS (Del. Ch. Ct.). Two days before the start of trial, the action settled for significant corporate governance changes and a payment ladder valued up to $7.5 billion, which was designed to protect shareholders against any diminution in the value of their shares during the first year of trading. Because of the payment ladder, shareholders ultimately recovered $522 million in cash and stock in May 2015.

In addition, Mr. Block represents some of the country's largest institutional investors, including the Massachusetts Pension Reserves Investment Management Board (PRIM), the Ohio Public Employees Retirement System, the Ohio State Teachers Retirement System, the Washington State Investment Board, the New Mexico Educational Retirement Board, the New Mexico Public Employees Retirement System, the New Mexico State Investment Council and the Oklahoma Police Pension and Retirement System.

Some of the major class actions that Mr. Block has either led, or played a significant role in, include: *In re First Executive Corp. Securities Litig.*, 89-cv-7135 (C.D. Cal.) (settled for $100 million); *In re Xerox Corp. Sec. Litig.*, 3:00-cv-01621 (D. Conn.) (settled for $750 million); *In re Bristol Myers Squibb Sec. Litig.*, 02-cv-2251 (S.D.N.Y.) (settled for $300 million); *In re Lernout & Hauspie Sec. Litig.*, 1:00-cv-11589 (D. Mass.) (settled for $180 million); *In re*

Symbol Technologies Sec. Litig., 2:02-cv-1383 (E.D.N.Y.) (settled for $127 million); *In re Prison Realty Corp. Sec. Litig.*, 3:99-cv-0452 (M.D. Tenn.) (settled for over $100 million); *In re Philip Services Corp. Sec. Litig.*, 98-cv-835 (S.D.N.Y.) (settled for $79.75 million); *In re American Home Mortgage Sec. Litig.*, 07-MD-1898 (E.D.N.Y.) (settled for $50.5 million); *In re Force Protection Sec. Litig.*, 2:08-cv-845 (D.S.C.) ($24 million settlement); *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.) ($5.5 million settlement).

"I was careful to choose attorneys who have great ability [and] great reputation... And I think you've undertaken the representation of these people, you've done an excellent job, you've reached a settlement that I think is fair and in their benefit ...".

Honorable C. Weston Houck, *In re Force Protection Sec. Litig., 2:08-cv-845 CWH* (D.S.C.) ($24 million settlement)

Mr. Block has a proven record of overcoming significant challenges to obtain substantial recoveries on behalf of his clients. For example, in the *Philip Services* securities litigation, Mr. Block persuaded the United States Court of Appeals for the Second Circuit to reverse the District Court's dismissal of the action on the grounds of *forum non conveniens*. *See Dirienzo v. Philip Services Corp.*, 294 F.3d 21 (2d. Cir. 2002). Upon reversal, Mr. Block led the team of attorneys in taking more than 40 depositions and, upon the eve of trial, the action settled for $79.50 million, among the largest recoveries ever in a securities action from a Canadian accounting firm. Mr. Block's skills were discussed in great lengths by the court, specifically noting that counsel:

> "pursued this fact-intensive and legally complex litigation vigorously over a nine-year period, rejected offers of settlement for amounts inferior to the amounts upon which the parties ultimately agreed, and assumed significant risks of non-recovery. Co-Lead Counsel had to overcome the disclaimers and uncertainties of insurance coverage, and vigorous advocacy of extremely able and deeply-staffed defense counsel. … And **THEY DID THEIR WORK EFFICIENTLY, WITH MINIMAL DUPLICATION, AND MAXIMUM EFFECTIVENESS**."

In re Philip Servs. Corp. Sec. Litig., 2007 U.S. Dist. LEXIS 101427, 13-14 (S.D.N.Y. Mar. 27, 2007) (Honorable Alvin K. Hellerstein). Similarly, in *Lernout & Hauspie Sec. Litig.*, Mr. Block was the lead attorney in securing over $180 million for defrauded investors. The action involved an accounting fraud of a company headquartered in both the United States and Belgium.

Recently, Mr. Block led a team of litigators, private investigators and a forensic accountant through a complex accounting fraud case. Mr. Block settled the case on terms extremely beneficial to the class, as recognized by the court. *See In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.).

"The settlement is – gosh. . . . the fact that it's occurring within the context of a securities case, which is very difficult for plaintiffs to win, is extremely impressive to me. . . . [T]his is a matter which has been fairly litigated by people who know what they're doing."

Honorable Graham C. Mullen, *In re Swisher Hygiene, Inc., Securities and Derivative Litig.*, 3:12-md-2384 GCM (W.D.N.C.) ($5.5 million settlement)

JASON M. LEVITON

Partner
Tel. 617-398-5600
Fax. 617-507-6020
Email. jason@blockesq.com



EDUCATION

- Georgetown University Law Center, LL.M., Securities and Financial Regulations (Dean's Award (1 of 6))
- Gonzaga University School of Law, J.D., *cum laude*, Moot Court Council, International Law Review
- Gonzaga University, B.A., Philosophy and Political Science

BAR ADMISSIONS

- Massachusetts
- District of Columbia
- State of Washington
- State of Florida

COURT ADMISSIONS

- District of Massachusetts
- District of Washington D.C.
- Western District of Washington

PUBLICATIONS | SPEAKING EVENTS

- Guest on *Rights Radio*
- Law360 Securities Law Editorial Advisory Board
- SEC Litigation Release No. 18638, primary author
- Contributor, *After the Ball is Over: Investor Remedies in the Wake of the Dot-Com Crash and Recent Scandals*, Nebraska Law Review, 2005
- Speaker at Georgetown University Law Center on prosecution of securities class action lawsuits
- Presenter at Business Law Symposium entitled *Shareholder Rights: An Idea Whose Time has Come*, November 2013
- Presenter at National Conference on Public Employee Retirement Systems' Summer Conference, May 2013

Mr. Leviton is a co-founding partner of Block & Leviton and focuses his practice on investor protection and shareholder rights matters. He serves as Co-Chair of the Firm's New Case Investigation and Monitoring Team and Chair of the Merger and Acquisition Litigation Team. In 2011 and each year thereafter, Mr. Leviton was named a "Rising Star" by *Massachusetts Super Lawyers*, an honor given to only 3% of all lawyers in the Commonwealth. In 2014, Mr. Leviton was named as a Top 100 Trial Lawyer by the National Trial Lawyer Association. After receiving his law degree, Mr. Leviton attended the Georgetown University Law Center and received a Master of Laws (LL.M.) in Securities and Financial Regulation (Dean's Award, 1 of 6). During that time, he was the inaugural LL.M. student selected for an externship with the S.E.C., Enforcement Division. Mr. Leviton is now a member of the Association of Securities and Exchange Commission Alumni.

Currently, Mr. Leviton represents several Ohio Pension Funds against BP following the largest oil spill in United States history. *See In re BP plc Securities Litigation*, Case No. 10-cv-2185 (S.D. Tex.) (settled for $175 million). Mr. Leviton also serves as co-lead counsel in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, Case No. CIV523789 (Cal. Sup. Ct) (settled for $30 million). In addition, Mr. Leviton has been named lead or co-lead counsel in numerous class actions, including: *In re Plains Exploration & Production Co. Stockholder Litig.*, Case No. 8090-VCN (Del. Ch.) (litigation led to an increase of approximately $400 million to the original merger amount); *In re MIPS Technologies, Inc. Stockholder Litig.*, Case No. 8103-VCN (Del. Ch.) (settled for numerous material disclosures and amendments to the merger agreement); *In re Cybex Int'l Shareholders Litig.*, Case No. 653794/2012 (N.Y. Sup. Ct) (settlement involved substantial dividend payment to shareholders); and *In re Sunoco, Inc.*, Case No. 1204-03894 (settlement required Sunoco to publish an update to its Proxy Statement to correct for material omissions).

Mr. Leviton has achieved significant recoveries on behalf of class members, including but not limited to: *In re Empire State Realty Trust, Inc. Investor Litigation*, case no. 650607/2012 (settled for $55 million); *In re KIT Digital, Inc. Securities Litigation*, Case No. 12-04199 (S.D.N.Y.) (settled for more than $6 million following the company's voluntary petition for bankruptcy); *In re Swisher Hygiene, Inc. Sec. and Deriv. Litig.*, MDL No. 3:12-MD-2384-GCM (W.D.N.C) (settled for nearly 40% of all cognizable damages); and *Brockton Retirement*

Board and City of Quincy Contributory Retirement Systems v. Oppenheimer Global Resource Private Equity Fund I, L.P., et al., Case No. 1:12-cv-10552 (D. Mass.) (settled for numerous improvements to Oppenheimer's corporate governance structure regarding the valuation of assets). In addition to his class action experiences, Mr. Leviton has litigated other forms of complex litigation. For instance, he worked with a former State of New York Attorney General in the defense of an attorney accused of insider trading, which included a criminal referral to the United States Department of Justice. He was also heavily involved in the representation of four detainees being held at the Guantánamo Bay Naval Station in Cuba.

Moreover, Mr. Leviton has represented former employee whistleblowers before the S.E.C. where, in one instance, he successfully argued that his clients should receive the maximum whistleblower award of 30% pursuant to the Dodd-Frank Act, which equated to nearly $1 million. He also represented the same whistleblower in a retaliation claim against several Oppenheimer-related entities. *See John Doe v. Oppenheimer Asset Management, Inc., et al.*, Case No. 1:14-cv-00779-LAP (S.D.N.Y.).

Mr. Leviton also has considerable experience litigating consumer class action cases involving deceptive business practices. For example, Mr. Leviton, as co-lead counsel, successfully recovered 100% of the class's alleged damages stemming from the overcharging of scooped coffee beans at Starbucks stores throughout the country. *See In re Starbucks Consumer Litig.*, Case No. 2:11-cv-01985-MJP (W.D. Wa.).

Prior to forming Block & Leviton, Mr. Leviton was an attorney at three other preeminent class action firms. There, he was instrumental in recovering $10.5 million in the *Welmon v. Chicago Bridge & Iron*, Case No. 06-cv-01283, securities class action litigation. In that case, Mr. Leviton represented Fortis Investments, a major European asset management company and, in addition to the monetary settlement, was able to institute several corporate governance changes at the company. In granting *the Chicago Bridge & Iron* settlement, the Honorable John Sprizzo stated that "**PLAINTIFFS' COUNSEL HAVE CONDUCTED THE LITIGATION AND ACHIEVED THE SETTLEMENT WITH SKILL, PERSEVERANCE AND DILIGENT ADVOCACY**." *Chicago Bridge & Iron* (June 3, 2008). Moreover, in the *Ong v. Sears Roebuck & Co.*, Case No. 03 C 4142 (N.D. Ill.), securities class action, Mr. Leviton represented the State Universities Retirement System of Illinois (SURS) and helped settle the action for $15.5 million. He also represented the Iowa Public Employees' Retirement System, the Policemen's Annuity & Benefit Fund of Chicago, the Central States, Southeast and Southwest Areas Pension Fund in the securities class action against MF Global that settled for $90.0 million. *See Rubin v. MF Global, LTD., et al.*, Case No. 08-cv-02233 (S.D.N.Y.). Likewise, he was a member of the *In re VeriSign Securities Litigation*, Case No. C-02-2270 (N.D. Cal.) team that recovered more than $78.0 million for investors.

WHITNEY E. STREET

Partner
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EDUCATION

- University of Virginia School of Law, J.D.
- University of Virginia, B.A., Economics and Literature

BAR ADMISSIONS

- California
- New York
- Massachusetts
- Texas

COURT ADMISSIONS

- Northern District of California
- Southern District of New York
- Eastern District of New York
- District of Massachusetts

PROFESSIONAL ACTIVITIES

- Co-Chair of the American Association for Justice Antitrust Litigation Group
- Law360 Competition Law Editorial Advisory Board
- Massachusetts Academy of Trial Attorneys
- National Association of Public Pension Attorneys

PUBLICATIONS | SPEAKING EVENTS

- Co-Author, *What Lies Ahead in High Stakes Pay-For-Delay Antitrust Litigation*, American Association of Justice Business Torts Newsletter (May 2015)
- Author, *Technology Assisted Review: the Disclosure of Training Sets and Related Transparency Issues*, Georgetown Law Advanced eDiscovery Institute (Fall 2014)
- Faculty, Georgetown University Law Advanced eDiscovery Institute (November 2014)
- Co-Author, *Decision Re-Affirms Critical Role of Shareholders* Benefits and Pensions Monitor (October 2014)
- Panelist, American Association for Justice Class Certification Seminar (2013)

Block & Leviton Partner Whitney Street has nearly fourteen years of complex litigation experience and significant expertise in antitrust and securities class action litigation. Ms. Street, who serves as Chair of the Firm's Competition Law Group, was appointed Co-Lead Counsel on behalf of a class of indirect purchasers in *In re Domestic Drywall Antitrust Litig.*, 13-md-02437 (E.D.Pa.), which involves allegations of price fixing and other forms of concerted conduct in violation of the antitrust laws. To date, Ms. Street has recovered more than $10 million on behalf of the class of indirect purchasers. The litigation is ongoing against the remaining four defendants. In addition, Ms. Street represents the City of Providence in an antitrust class action suit against Celgene Corp. for unlawfully excluding generic competition for vital cancer treatment drugs. *See In re Thalomid and Revlimid Antitrust Litig.*, 14-cv-06997 (D.N.J.). Most recently, Ms. Street was appointed to the Plaintiffs' Steering Committee in *In re Packaged Seafood Antitrust Litig.*, 15-md-02670 (S.D.Cal.) (alleging price fixing in the market for shelf-stable seafood products) and in *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and price fixing in the market for aluminum sulfate).

Ms. Street was also an integral part of the litigation teams in the following antitrust class actions: *Air Cargo Shipping Services Antitrust Litigation*, 06-md-1775 (E.D.N.Y.) (settlements totaling more than $270.0 million); *In re: Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation*, 3:03-md-1542 (D. Conn.) (partial settlements totaling $87.0 million); *In re: Methyl Methacrylate (MMA) Antitrust Litigation*, 06-md-01768 (E.D. Pa.) (settled for $15.0 million); and *In re: Hydrogen Peroxide Antitrust Litigation*, 05-civ-666 (E.D. Pa.) (partial settlements of more than $4.0 million).

Ms. Street received her training at prominent litigation firms in New York and Boston where she represented clients in antitrust and securities class actions. She began her career at Pillsbury Winthrop Shaw Pittman, one of the largest law firms in California.

R. JOSEPH BARTON
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EDUCATION

- College of William & Mary, Marshall-Wythe Law School, J.D.
- College of William & Mary, B.A., History and Classical Studies

BAR ADMISSIONS

- California
- District of Columbia

COURT ADMISSIONS

- Second, Fourth, Fifth, Seventh, Eighth, Ninth, Tenth and Eleventh Circuit Courts of Appeal
- District of Columbia
- Southern, Central and Northern Districts of California
- District of Maryland
- Northern and Western Districts of Texas
- Northern District of Illinois

PROFESSIONAL ACTIVITIES

- Co-Chair of the Civil Procedure Subcommittee for the ABA Employee Benefits Committee
- Co-Chair of American Association of Justice (AAJ)
- Chair of Employment Rights Section of the AAJ from 2013 to 2014

R. Joseph Barton, a Partner at the Firm, is the Chair of the Firm's Employee Benefits Group and the Firm's Veterans/Servicemember Rights Group at the Firm. Mr. Barton has more than 15 years experience handling a diverse array of complex and class litigation. Mr. Barton has a Martindale-Hubbell AV Preeminent Rating, has been selected every year since 2013 as a Washington, D.C. Super Lawyer, has a 10.0 rating from Avvo, and is listed in the Marquis' Who's Who in American Law.

Notable ERISA Cases

Over the last 15 years, Mr. Barton has handled a wide variety of employee benefit (i.e. ERISA) cases. He has been trial counsel in four ERISA cases. He was lead trial counsel in a case challenging a complex transaction involving the Trachte ESOP and the Alliance ESOP on behalf of a class of employees of Trachte, *Chesemore v. Alliance Holdings, Inc.*, No. 3:09-cv-00413 (W.D. Wis.). In that case, Mr. Barton obtained a favorable trial decisions on a liability and remedies of $17.2 million (plus prejudgment interest) for the Class which was affirmed by the Seventh Circuit. In *Severstal Wheeling Inc. Ret. Comm. v. WPN Corporation*, No. 10-cv-954 (S.D.N.Y.), Mr. Barton was lead trial counsel representing the fiduciaries of two pension plan suing their former investment manager for improper investments and obtained a judgment for plaintiffs of over $15 million which was affirmed by the Second Circuit.

Mr. Barton is among a handful of lawyers who regularly represent participants in litigation involving ESOPs holding privately held stock. In addition to the Alliance/Trachte ESOP litigation, Mr. Barton has litigated and is litigating a number of private ESOP cases, including the Jeld-Wen ESOP, the Tharaldson Motels, Inc. ESOP and, the Azon Corporation ESOP.

Mr. Barton has also been involved in a number of cases involving breaches of fiduciary duty and self-dealing, including improperly investing 401k plan assets in artificially inflated stock of publicly traded companies, in improper and risky investments such as hedge funds or private equity. Mr. Barton litigated one of the earliest cases challenging the prudence of investment and fees of the pension and 401k plans sponsored by New York Life Insurance Company.

Mr. Barton has also litigated cases involving the failure to properly pay benefits. In *Slipchenko v. Brunel*, No. 4-11-cv-01465 (S.D.

Tex.), Mr. Barton obtained a settlement in a COBRA class action which resulted in the largest per class-member recovery in any reported COBRA class action. In *Simpson v. Fireman's Fund Insurance Company* (N.D. Cal.), Mr. Barton represented a class employees alleging that FFIC's policy of terminated persons on disability violated the discrimination provisions of ERISA, and obtained a settlement restoring their right to benefits for a period of years and also reimbursement of past expenses.

Notable Cases Involving Veterans & Servicemembers

In cases involving the rights of veterans and servicemembers, Mr. Barton is proud to have achieved results which one court described as "outstanding, worthy of being emulated by class representatives and counsel in other comparable litigation." In that case, *Tuten v. United Airlines*, No. 12-cv-1561-WJM-MEH (D. Col.), Mr. Barton was lead counsel for a class of United Airlines Pilots alleging USERRA violations in connection with their pension contributions. The case was settled for an amount that provided the Class with 100% of their actual damages. In *Bush v. Liberty Life Assurance Co.*, Mr. Barton was lead class counsel on behalf of a class participants whose long term disability benefits were insured by Liberty Life alleging that those benefits should not have been reduced by the amount of benefits provided through the Department of Veterans Affairs. As part of the settlement, Liberty Life agreed to return 60% of the monies imposed as offsets and to cease imposing such reductions/offsets unless and until the state departments of insurance had approved them.

Pro Bono Cases

Mr. Barton considers pro bono representation an important part of his practice and has represented clients in actions concerning their employer's failure to pay wages and/or overtime. In one such case, the Judge in D.C. Superior Court described Mr. Barton's representation as follows: "everything done on behalf of the Plaintiff has been professional, timely and thorough."

JACOB WALKER

Senior Associate
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EDUCATION

- University of Michigan Law School, J.D., *cum laude*
- Babson College, B.S., Business Administration

BAR ADMISSIONS

- Massachusetts
- California

COURT ADMISSIONS

- District of Massachusetts
- Northern District of California
- Central District of California

PROFESSIONAL CERTIFICATIONS

- Certified Information Privacy Professional (CIPP/US)

PUBLICATIONS

- Co-author, PLI's Securities Litigation treatise – chapters on loss causation and securities trials

Prior to joining Block & Leviton, Mr. Walker was an associate at two of the country's top defense firms, Gibson Dunn and Skadden Arps. Mr. Walker has represented boards of directors, corporate acquisition targets, and acquirers in litigation related to mergers and acquisitions. For example, he represented defendants in litigation related to the $5.3 billion private equity acquisition of Del Monte Foods Company in state and federal courts in California and Delaware, as well as in litigation related to Intel's $7.7 billion acquisition of McAfee Inc. in the Superior Court of California. He has also represented numerous third-parties, including various investment banks, in M&A litigation in California and Delaware courts.

In addition, Mr. Walker has represented several large technology companies, including in the defense of consumer class actions related to privacy and technology issues. He is a Certified Information Privacy Professional and has a deep understanding of technology and privacy issues. Mr. Walker has also represented companies in antitrust class actions and investigations, stockholder derivative actions, securities class actions, and in investigations before the F.T.C. and the Massachusetts Attorney General's office.

Mr. Walker represents the Louisiana Municipal Police Employees' Retirement System in *In re Onyx Pharmaceuticals Inc. Shareholder Litigation*, case no. CIV523789 (Cal. Sup. Ct.), a matter arising out of Onyx's $11 billion dollar merger with Amgen (settled for $30 million). Mr. Walker is also part of a team of Block & Leviton attorneys conducting work on behalf of consumer plaintiffs in the VW diesel engine litigation, case no. 3:15-md-02672 (N.D. Cal.) (initial settlement valued at over $15 billion). Mr. Walker also represents lead plaintiffs in securities class actions against Amicus Therapeutics (D. N.J.) and Global Power Equipment Corporation (N.D. Tex.), and in litigation related to the $4 billion private equity take-out of Life Time Fitness, Inc., case no. 15-cv-01911 (D. Minn.).

As part of his pro bono practice, Mr. Walker was part of a team of attorneys who represented Indian workers illegally trafficked to the Gulf Coast. Claims against the company have been proposed to be settled for over $20 million as part of a pending bankruptcy case. Mr. Walker has also been recognized by the American Bar Association for his pro bono work on behalf of active duty military members and for his work teaching financial literacy skills to Boston-area high school students.

EDUCATION

- University of California Berkeley School of Law, J.D.
- University of California, Berkeley, B.A., Philosophy and Mathematics

BAR ADMISSION

- California

VINCENT CHENG
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Vincent Cheng joined Block & Leviton LLP in January 2017. He is an associate at the firm and a member of the Employee Benefits Group and Veterans/Servicemember Rights Group.

Since graduating from law school, Mr. Cheng has focused his work on advocating for the employment and employee benefits rights of employees and retirees and of veterans. Prior to joining Block & Leviton in January 2017, he was actively involved in a variety of class action lawsuits brought under the Employee Retirement Income Security Act (ERISA) involving breach of fiduciary duty and benefit denial claims, as well as cases brought under the Uniformed Services Employment and Reemployment Rights Act (USERRA) involving veterans rights and benefits.

JOEL A. FLEMING

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EDUCATION

- Harvard Law School, J.D., *cum laude*
- Wilfrid Laurier University, B.A., Political Science *with high distinction*

BAR ADMISSIONS

- California
- Massachusetts

COURT ADMISSIONS

- Ninth Circuit
- First Circuit
- Northern District of California
- Central District of California
- District of Massachusetts

PUBLICATIONS

- Co-author, *Decision Re-Affirms Critical Role of Shareholders,* Benefits and Pensions Monitor (October 2014)
- Co-author, *Meltdowns crank up muni-bond litigation*, Daily Journal (September 18, 2013)
- Co-author, *SEC takes hard line on 'cyber incidents'*, Daily Journal (April 5, 2013)
- Co-author, *Lower Courts Interpret The Supreme Court's Decision In Janus Capital Group, Inc. v. First Derivative Traders*, Financial Fraud Law Report 4:5 (May 2012)

PROFESSIONAL ACTIVITIES

- Visiting Lecturer, Tufts University: Experimental College (2013-Present)

Block & Leviton Associate Joel Fleming has significant experience in securities and other complex litigation. Mr. Fleming is currently the lead associate for Block & Leviton in *Bessler v. Zafgen, Inc.*, 1:15-cv-13618-FDS (D. Mass.), in which the firm is acting as co-lead counsel for a putative class of shareholders alleging securities fraud in connection with material omissions regarding Zafgen's clinical trials of its lead drug candidate, beloranib.

Mr. Fleming also serves as the lead associate challenging Reynolds' conflicted transaction with its controlling shareholder, British American Tobacco, in connection with its purchase of Lorillard Inc. for $27.4 billion and as the lead associate for a putative class of Charter Communications shareholders, challenging an unfair share issuance to Charter's controlling shareholders, Liberty Broadband and John Malone, in connection with Charter's purchase of Time Warner Cable and Bright House Networks. *Corwin v. British Am. Tobacco, et al.*, 14 CVS 8130 (N.C. Sup.) and *Sciabacucchi v. Liberty Broadband Corp., et al.*, No. 11418-VCG (Del. Ch.).

Mr. Fleming was the lead associate in *Vladimir Gusinsky Living Trust v. Berman*, No. 2:14-01420-JAK (C.D. Cal.), a derivative action on behalf of Jakks Pacific, Inc., which was resulted in a pending settlement that would impose significant corporate governance reforms, valued by expert testimony as worth $20 to $40 million to the company.

Prior to joining the firm, Mr. Fleming was a member of the Securities Litigation and Enforcement group at Wilmer Cutler Pickering Hale and Dorr—a large defense firm headquartered in Boston and Washington, D.C. While at WilmerHale, Mr. Fleming served as a member of the trial team in *AATI v. Skyworks*, the first-ever arbitration to go to trial before the Delaware Chancery Court, in a case involving a merger-related dispute between two companies in the high technology industry. Mr. Fleming represented both companies in a subsequent shareholder class action that ended with the dismissal with prejudice of all counts. Mr. Fleming also served as a trial team member representing the Public Service Department of the State of Vermont in a contested proceeding involving the proposed relicensing of the Vermont Yankee nuclear plant.

EDUCATION

- Northeastern University School of Law, J.D.
- Vanderbilt University, B.A., Economics & Corporate Strategy

BAR ADMISSIONS

- Massachusetts

COURT ADMISSIONS

- District of Massachusetts
- Eleventh Circuit Court of Appeals

PROFESSIONAL ACTIVITIES

- American Bar Association
- Women's Bar Association
- National Association of Public Pension Attorneys

ERICA G. LANGSEN
Associate
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Email. erica@blockesq.com



Ms. Langsen is an associate at Block & Leviton where her practice focuses on antitrust, securities and employment class action litigation. Ms. Langsen is an integral member of a team of attorneys litigating the antitrust class action *In re Domestic Drywall Antitrust Litigation*, case no. 13-md-02437 (E.D.Pa.), recovering more than $10 million on behalf of the class to date. The litigation is ongoing against the remaining four defendants. Ms. Langsen also represents the City of Providence in an antitrust class action against Celgene Corp. (*In re Thalomid and Revlimid Antitrust Litig.*, case no. 14-cv-06997 (D.N.J)), which alleges that Celgene unlawfully excluded generic competition for vital cancer treatment drugs. Ms. Langsen is also part of a team of attorneys conducting work on behalf of plaintiffs in *In re Packaged Seafood Antitrust Litig.*, 15-md-02670 (S.D.Cal.) (alleging price fixing in the market for shelf-stable seafood products) and *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and price fixing in the market for aluminum sulfate).

Ms. Langsen, who is a member of the Firm's New Case Investigation and Portfolio Monitoring Team, has also represented numerous classes of investors asserting various securities claims. For example, she is currently litigating *In re BP plc Securities Litigation*, case no. 4:10-md-02185 (S.D.Tex.), *In re EZCORP, Inc. Securities Litigation*, No. 1:15-cv-00608 (W.D.Tex.) and *Budde v. Global Power Equipment Inc. et al.*, 3:15-cv-02120 (N.D. Tex.), and was part of a team of attorneys who recovered favorable settlements for investors in the securities class actions *In re Cybex Int'l*, case no. 653794/2012 (merger premium increased by over 10%), and *In re Swisher Hygiene, Inc.*, case no. 3:12-MD-2384-GCM (settlement of $5.5 million).

In addition, Ms. Langsen is a member of the Firm's Employment Litigation Team, where she has represented tradesmen seeking unpaid employment benefits and other damages from national and multi-national retailers. She recovered a significant settlement ($6.5 million) in favor of a class of California installers in *Shephard v. Lowe's HIW, Inc.*, case no. 12-cv-03893 (N.D.Cal.).

Before joining Block & Leviton, Ms. Langsen was one of three Northeastern University School of Law students selected for an internship with the S.E.C., Enforcement Division.

EDUCATION

- Washington University in Saint Louis School of Law, J.D. (Dean's List)
- Metropolitan State University of Denver, B.A., History

BAR ADMISSIONS

- Massachusetts
- Illinois
- Missouri

COURT ADMISSIONS

- District of Massachusetts
- Southern District of Illinois

BRADLEY VETTRAINO
Associate
Tel. 617-398-5600
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Email. bradley@blockesq.com



Prior to joining Block & Leviton in 2015, Mr. Vettraino worked as an associate at both Bubalo Goode Sales & Bliss, and Maune Raichle Hartley French & Mudd.

Mr. Vettraino is experienced in all stages of complex civil litigation, including discovery and dispositive motion practice. In addition, he has worked on an array of complex civil matters, including products liability cases, consumer protection matters and business litigation in both state and federal courts.

In addition, Mr. Vettraino has experience managing and litigating over fifteen plaintiffs' toxic tort cases, securing favorable settlements in numerous matters. In addition, he successfully argued in opposition to a motion for summary judgment before a state court.

Mr. Vettraino is a member of the team representing the Ohio Public Employees' Retirement System in the securities class action *In re BP plc Sec. Litig.*, Case No. 4:10-md-02185 (S.D. Tex.), which recovered $175 million to investors related to the explosion and subsequent massive oil spill in the Gulf of Mexico in 2010. Additionally, Mr. Vettraino is a member of the team representing a pension fund in the class action *In re Onyx Pharmaceuticals, Inc. Securities Litigation*, case no. CIV523789 (Cal. Sup. Ct.), in which a $30 million settlement is pending and, if approved, will be the second largest post-close merger and acquisition settlement in California state court history. Mr. Vettraino also represents shareholders of Rentrak Corporation in a lawsuit currently pending in Oregon against the Company and its Board of Directors relating to the proposed acquisition of Rentrak Corporation by comScore. *See In re Rentrak Corporation Shareholders Litigation*, Case No. 15-cv-27429 (Ore. Cir. Ct.). Mr. Vettraino also represents Amalgamated Bank in a books and records action against Wal-Mart in Delaware Chancery Court and secured a key ruling against Wal-Mart on a motion to compel and for monetary sanctions.

Upon graduating from Washington University in St. Louis, Mr. Vettraino received the Dan Carter-Earl Tedrow Memorial Award, an award given to the student who most exemplifies the aims of the legal profession. Mr. Vettraino also served as an Executive Board Member and Primary Editor of the Global Studies Law Review.

MATTHEW SMITH
Associate
Tel. 415-968-8992
Fax. 617-507-6020
Email. matt@blockesq.com

EDUCATION

- Duke Law School, J.D., L.L.M., *magna cum laude* & Order of the Coif
- Columbia University, B.A., History

BAR ADMISSIONS

- New York
- District of Columbia
- California

COURT ADMISSIONS

- Second and Third Circuit Courts of Appeals
- Eastern District of Michigan
- District of Colorado
- Northern and Central Districts of California

Matt is an Associate in the Firm's Antitrust and Employee Benefits practices. After graduating *magna cum laude* from Duke Law School, Matt served as a law clerk to the Honorable Rosemary Barkett on the Eleventh Circuit Court of Appeals.

Before joining Block and Leviton, Matt practiced at nationally-recognized plaintiff's firms based in Washington, D.C., and Seattle, Washington, where his practice concentrated on antitrust and employee benefits cases. Matt collaborated with R. Joe Barton in *Severstal Wheeling, Inc. Retirement Committee et al. v. WPN Corp., et al.* (2d. Circuit). As part of a two-attorney trial team, they won a $15 million judgment on behalf of thousands of retired steelworkers. Matt has valuable experience serving as lead associate in a myriad of successful litigation, ranging from cases where military veterans were wrongfully denied long-term disability benefits (*Bush v. Liberty Life Assurance Co. of Boston et al.* (N.D. Cal.)), to nationally-contested issues of federal pension regulation (*Kaplan v. Saint Peter's Healthcare System, et al.* (3d Circuit)).

Currently, Matt represents the City of Providence in an antitrust class action against Celgene Corporation (*In re Thalomid and Revlimid Antitrust Litig*., case no. 14-cv-06997 (D.N.J)), which alleges that Celgene unlawfully excluded generic competition for vital cancer treatment drugs. He is also part of a team of attorneys working on behalf of plaintiffs in *In re Packaged Seafood Antitrust Litig*., 15-md-02670 (S.D.Cal.) (alleging price- fixing in the market for shelf-stable seafood products), *In re Liquid Aluminum Sulfate Antitrust Litig.*, 16-md-02687 (D.N.J.) (alleging bid rigging, market allocation, and pricefixing in the market for aluminum sulfate), and *In re Broiler Chicken Antitrust Litig.*, No. 1:16-cv-08637 (N.D. Ill.).

Matt has maintained an active pro bono practice including advising the Sierra Club's Environmental Law Program on antitrust and competition policy issues concerning the nation's energy infrastructure, and representing an applicant to serve as chaplain in the United States Navy.

A recent California transplant, Matt enjoys spending his free time hiking in Los Padres National Forest with his three-year old Brittany Spaniel.

JEFFREY GRAY

Associate
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Email. jgray@blockesq.com

EDUCATION

- Suffolk University Law School, J.D.
- Sawyer Business School, Suffolk University, M.B.A.
- Connecticut College, B.A., Economics

BAR ADMISSIONS

- Massachusetts

Mr. Gray joined Block & Leviton as an associate in 2016, where his practice focuses on consumer class action litigation. Mr. Gray is experienced in conducting large scale document review projects.

Mr. Gray is a member of the Block & Leviton LLP litigation team representing members of the class in the matter Volkswagen “Clean Diesel” MDL. Prior to joining Block & Leviton, Mr. Gray also received valuable experience with class action shareholder suits, breach of contract cases, and defense of trademark infringement claims, as well as SEC and DOJ investigations of pharmaceutical companies and hedge funds.

Earlier in his career, Mr. Gray was a management consultant at a financial services firm in the Boston area and, prior to that, was a project manager in commercial lending at FleetBoston Financial. While in law school, he completed internships with MFS and with The Nature Conservancy and was a law clerk at CT Corporation System.

EXHIBIT B

EXHIBIT B

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

Firm Name: Block & Leviton LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jeff Block (P)											0.50				0.50	$825.00	$412.50
NameWhitney Street			0.50				1.80	0.25	4.85		11.35				18.75	$715.00	$13,406.25
Lesley Weaver (P)			14.60		109.00	9.50	34.10	0.30	8.60	9.30	38.40	0.60			224.40	$725.00	$162,690.00
Mili Desai (A)	13.80		12.10		40.70	2.10	13.30	14.80	3.00	54.70	5.10				159.60	$575.00	$91,770.00
Leigh O'Neil (A)			6.40				237.80		2.60		51.00				297.80	$395.00	$117,631.00
Erica Langsen (Sorg) (A)	5.10														5.10	$525.00	$2,677.50
Daniel Fishman											14.70				14.70	$185.00	$2,719.50
Kasey Sullivan							3.10								3.10	$350.00	$1,085.00
Yunah Rah		12.00	16.00		14.00		637.40		8.90	30.10	1.00				719.40	$395.00	$284,163.00
Britt Cabulka							36.00		2.50						38.50	$350.00	$13,475.00
SUB-TOTAL	**18.90**	**12.00**	**49.60**	**0.00**	**163.70**	**11.60**	**963.50**	**15.35**	**30.45**	**94.10**	**122.05**	**0.60**	**0.00**	**0.00**	**1481.85**		**$690,029.75**
NON-ATTORNEYS																	
Julie Ledwig (PL)		1.50	0.60					5.85			15.15				31.85	$225.00	$7,166.25

SUB-TOTAL	**0.00**	**1.50**	**0.60**	**0.00**	**0.00**	**0.00**	**0.00**	**5.85**	**0.00**	**0.00**	**15.15**	**0.00**	**0.00**	**0.00**	**31.85**		**$7,166.25**
GRAND TOTAL:	**18.90**	**13.50**	**50.20**	**0.00**	**163.70**	**11.60**	**963.50**	**21.20**	**30.45**	**94.10**	**137.20**	**0.60**	**0.00**	**0.00**	**1513.70**		**$697,196.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BLOCK & LEVITON LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Jeffrey Block	Starting January 2017	$825.00
Jeffrey Block	2013 – 2016	$795.00
Whitney Street	Starting January 2017	$715.00
Whitney Street	Starting January 2016	$675.00
Whitney Street	2013 – 2015	$595.00
Lesley Weaver	Starting January 2016	$725.00
Lesley Weaver	2015	$650.00
Mili Desai		$575.00
Leigh O'Neil (for Doc. Review tasks)		$350.00
Leigh O'Neil	Starting in January 2014	$395.00
Leigh O'Neil	June 2013 – Dec. 2013	$325.00
Erica Langsen (Sorg)	Starting January 2017	$525.00
Erica Langsen (Sorg)	2013 – 2016	$350.00
Daniel Fishman		$185.00
Kasey Sullivan		$350.00
Yunah Rha		$395.00
Britt Cibulka		$350.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Julie Ledwig		$225.00

EXHIBIT D

(REDACTED)

Block & Leviton LLP - User Time and Lodestar Summary

Date Start: 6/1/2013 | Date End: 12/31/2013 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Leigh O'Neil								
07/30/2013	Lithium Ion Batteries	Batteries	Draft letters to clients regarding executed copies of retainers	(11) Litigation Strategy, Analysis & Case Management	$325.00 hr	2.20	2.20	$715.00
					Total Labor For Leigh O'Neil	**2.20**	**2.20**	**$715.00**
Whitney Street								
06/11/2013	Lithium Ion Batteries	Batteries	Conference calls regarding Illinois plaintiff, Brad Marcus.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
06/12/2013	Lithium Ion Batteries	Batteries	Conference calls with co-counsel and client's employer, J. Kessler; follow up call and emails re: same.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.50	0.50	$297.50
06/20/2013	Lithium Ion Batteries	Batteries	Follow-up regarding B. Marcus.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
06/30/2013	Lithium Ion Batteries	Batteries	Follow-up with co-counsel regarding confidentiality agreements; call re: same.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.30	0.30	$178.50
07/02/2013	Lithium Ion Batteries	Batteries	Follow-up regarding confidentiality agreements; discuss case status with team.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
07/16/2013	Lithium Ion Batteries	Batteries	Draft email to client.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
07/26/2013	Lithium Ion Batteries	Batteries	Follow-up on request from co-counsel regarding 93A letters; review filings regarding amended complaints and motions to dismiss.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	0.80	0.80	$476.00
07/27/2013	Lithium Ion Batteries	Batteries	Research follow-up request from co-counsel regarding 93A letters; draft response re: same.	(3) Drafting Discovery Answers/Responses	$595.00 hr	0.50	0.50	$297.50
07/29/2013	Lithium Ion Batteries	Batteries	Follow-up regarding retainers and questionnaires.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
07/30/2013	Lithium Ion Batteries	Batteries	Draft email to client regarding role in case; conference call with counsel regarding retainer letters; confer with L. O'Neil re: same.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.30	0.30	$178.50
08/05/2013	Lithium Ion Batteries	Batteries	Draft letter to B. Martinez; review recent court submissions and update files accordingly.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	0.50	0.50	$297.50
08/12/2013	Lithium Ion Batteries	Batteries	Review letter briefs filed by defendants and IPP and DPP responses thereto.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	1.00	1.00	$595.00
08/14/2013	Lithium Ion Batteries	Batteries	Review proposed order and emails; call with co-counsel re: case status and developments.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	0.30	0.30	$178.50
09/17/2013	Lithium Ion Batteries	Batteries	Review and file recent submissions to the court.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$595.00 hr	0.25	0.25	$148.75
11/07/2013	Lithium Ion Batteries	Batteries	Review recent submissions to the court.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	0.10	0.10	$59.50
12/01/2013	Lithium Ion Batteries	Batteries	Review Kessler letter to the court regarding proposed agenda; email L. Weaver re: same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$595.00 hr	0.25	0.25	$148.75
12/09/2013	Lithium Ion Batteries	Batteries	Call with L. Weaver re: update on the hearing.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
					Total Labor For Whitney Street	**6.20**	**6.20**	**$3,689.00**
					Grand Total Labor	**8.40**	**8.40**	**$4,404.00**

Block & Leviton LLP - User Time and Lodestar Summary

Date Start: 1/1/2014 | Date End: 12/31/2014 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Julie Ledwig								
12/11/2014	Lithium Ion Batteries	Batteries	Calendar motion deadlines.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
12/23/2014	Lithium Ion Batteries	Batteries	Research CA Rules regarding Notice of Change of Address; begin drafting Notice for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.90	0.90	$202.50
12/24/2014	Lithium Ion Batteries	Batteries	Draft Notice of Change of Address for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.40	0.40	$90.00
12/29/2014	Lithium Ion Batteries	Batteries	Revise notice change of address.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.40	0.40	$90.00
				Total Labor For Julie Ledwig		**1.90**	**1.90**	**427.50**
Leigh O'Neil								
01/30/2014	Lithium Ion Batteries	Batteries	Calculate and update 2013 time and expense chart	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.90	1.90	$750.50
01/31/2014	Lithium Ion Batteries	Batteries	Revise and submit 2013 time and expense sheets broken down by month	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	3.90	3.90	$1,540.50
05/30/2014	Lithium Ion Batteries	Batteries	Discuss case status with WES	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
06/01/2014	Lithium Ion Batteries	Batteries	Review coding manual	(7) Document Review	$350.00 hr	1.10	1.10	$385.00
06/02/2014	Lithium Ion Batteries	Batteries	Review coding manual and pleadings	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcrip	$395.00 hr	1.20	1.20	$474.00
06/04/2014	Lithium Ion Batteries	Batteries	Catalyst Document Review Training	(7) Document Review	$350.00 hr	1.30	1.30	$455.00
06/09/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT0000001-429]; review coding manual	(7) Document Review	$350.00 hr	2.40	2.40	$840.00
06/11/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000459-644]	(7) Document Review	$350.00 hr	3.30	3.30	$1,155.00
06/12/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000644N-812]	(7) Document Review	$350.00 hr	1.30	1.30	$455.00
06/13/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00000816-994]	(7) Document Review	$350.00 hr	4.10	4.10	$1,435.00
06/15/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00001006-1132]	(7) Document Review	$350.00 hr	2.70	2.70	$945.00
06/16/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00001132N-18880]	(7) Document Review	$350.00 hr	6.30	6.30	$2,205.00
06/17/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00018880N-19167]	(7) Document Review	$350.00 hr	5.80	5.80	$2,030.00
06/18/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019174-19375N]	(7) Document Review	$350.00 hr	4.10	4.10	$1,435.00
06/20/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019382-19580]	(7) Document Review	$350.00 hr	6.90	6.90	$2,415.00
06/24/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00019582-19700]	(7) Document Review	$350.00 hr	1.80	1.80	$630.00
06/28/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040526-40550]	(7) Document Review	$350.00 hr	2.40	2.40	$840.00

06/30/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040552-40581]	(7) Document Review	$350.00 hr	4.20	4.20	$1,470.00
07/01/2014	Lithium Ion Batteries	Batteries	Review NEC documents; document review conference call [NECT000040582-40646]	(7) Document Review	$350.00 hr	4.60	4.60	$1,610.00
07/10/2014	Lithium Ion Batteries	Batteries	Review NEC documents for evidence of conspiracy [NECT00040647-40675]	(7) Document Review	$350.00 hr	8.10	8.10	$2,835.00
07/11/2014	Lithium Ion Batteries	Batteries	Review NEC and Panasonic documents for evidence of conspiracy [NECT00040676-40692; P-DO	(7) Document Review	$350.00 hr	5.80	5.80	$2,030.00
07/14/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ00002846-14775]	(7) Document Review	$350.00 hr	7.10	7.10	$2,485.00
07/15/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0014780-24814]	(7) Document Review	$350.00 hr	8.40	8.40	$2,940.00
07/16/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0024819-28555]	(7) Document Review	$350.00 hr	8.40	8.40	$2,940.00
07/17/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0028576-32363]	(7) Document Review	$350.00 hr	8.30	8.30	$2,905.00
07/21/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0032364-32832]	(7) Document Review	$350.00 hr	8.20	8.20	$2,870.00
07/22/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0032833-35085]	(7) Document Review	$350.00 hr	8.10	8.10	$2,835.00
07/23/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0035086-47990]	(7) Document Review	$350.00 hr	5.10	5.10	$1,785.00
07/24/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0047991-49393]	(7) Document Review	$350.00 hr	5.20	5.20	$1,820.00
07/25/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0049394-49496]	(7) Document Review	$350.00 hr	8.10	8.10	$2,835.00
07/28/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0049467-52875]	(7) Document Review	$350.00 hr	8.20	8.20	$2,870.00
07/29/2014	Lithium Ion Batteries	Batteries	Review coding manual; review Panasonic documents for evidence of conspiracy [P-DOJ0052876-58785]	(7) Document Review	$350.00 hr	8.10	8.10	$2,835.00
07/30/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0058786-58843]	(7) Document Review	$350.00 hr	7.20	7.20	$2,520.00
07/31/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0058844-61700]	(7) Document Review	$350.00 hr	7.20	7.20	$2,520.00
08/01/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0061925-78329]	(7) Document Review	$350.00 hr	5.10	5.10	$1,785.00
08/04/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0078343-80084]	(7) Document Review	$350.00 hr	2.70	2.70	$945.00
08/06/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0080092-84157]	(7) Document Review	$350.00 hr	1.20	1.20	$420.00
08/07/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0084888-95000N]	(7) Document Review	$350.00 hr	7.50	7.50	$2,625.00
08/08/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0095005-96183]	(7) Document Review	$350.00 hr	6.70	6.70	$2,345.00
08/14/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0098489-102920]	(7) Document Review	$350.00 hr	5.10	5.10	$1,785.00
08/17/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0103007-103428]	(7) Document Review	$350.00 hr	1.30	1.30	$455.00
08/18/2014	Lithium Ion Batteries	Batteries	01034Review Panasonic documents for evidence of conspiracy. [P-DOJ103432-113682]	(7) Document Review	$350.00 hr	3.10	3.10	$1,085.00
08/19/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ1113684-114024]	(7) Document Review	$350.00 hr	4.10	4.10	$1,435.00
08/20/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy P-DOJ0114102-122596]	(7) Document Review	$350.00 hr	6.70	6.70	$2,345.00

08/21/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0122597-123302]	(7) Document Review	$350.00 hr	8.10	8.10	$2,835.00
08/22/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy [P-DOJ0123303-128948]	(7) Document Review	$350.00 hr	7.40	7.40	$2,590.00
08/27/2014	Lithium Ion Batteries	Batteries	Review Pansonic documents for evidence of conspiracy [P-DOJ0128948N-129101]	(7) Document Review	$350.00 hr	2.10	2.10	$735.00
08/28/2014	Lithium Ion Batteries	Batteries	Review Panasonic documents for evidence of conspiracy. [P-DOJ0129107-132509N]	(7) Document Review	$350.00 hr	2.50	2.50	$875.00
09/30/2014	Lithium Ion Batteries	Batteries	Review team conference call; review updated coding manual	(7) Document Review	$350.00 hr	0.90	0.90	$315.00
10/02/2014	Lithium Ion Batteries	Batteries	Review Sony documents for evidence of conspiracy [SONY-LIB-000023623-23627]	(7) Document Review	$350.00 hr	2.40	2.40	$840.00
					Total Labor For Leigh O'Neil	**238.00**	**238.00**	**$83,628.50**

Whitney Street

01/22/2014	Lithium Ion Batteries	Batteries	Review recent submissions to the court and the court's order re: the motions to dismiss; confer with co-counsel and team re: same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcrip	$595.00 hr	1.20	1.20	$714.00
01/23/2014	Lithium Ion Batteries	Batteries	Review case status; conference call with L. Weaver re: same.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
01/28/2014	Lithium Ion Batteries	Batteries	Review email from liaison counsel	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.10	0.10	$59.50
02/07/2014	Lithium Ion Batteries	Batteries	Email team re: clients.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.30	0.30	$178.50
02/09/2014	Lithium Ion Batteries	Batteries	Review email from L. Weaver regarding products; review letter to court; follow-up with team regarding state representatives.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.30	0.30	$178.50
02/11/2014	Lithium Ion Batteries	Batteries	Retainer; confer with L. Weaver re: client development and case status.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.50	0.50	$297.50
02/12/2014	Lithium Ion Batteries	Batteries	Conference call with L. Weaver; review documents and correspondence; draft email to co-lead counsel re: state representatives; follow-up emails with L. Weaver re: same.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	1.30	1.30	$773.50
02/13/2014	Lithium Ion Batteries	Batteries	Retainer agreement.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
02/21/2014	Lithium Ion Batteries	Batteries	Follow-up regarding client development efforts (Montana and Utah).	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
02/28/2014	Lithium Ion Batteries	Batteries	Follow-up with team re: client development efforts.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
04/01/2014	Lithium Ion Batteries	Batteries	Review recent submissions; follow-up re: receipts for Montana and Utah clients.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
05/27/2014	Lithium Ion Batteries	Batteries	Review recent submissions to the court and orders	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	1.00	1.00	$595.00
05/27/2014	Lithium Ion Batteries	Batteries	confer with L. Weaver regarding case status and strategy	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	1.00	1.00	$595.00
05/27/2014	Lithium Ion Batteries	Batteries	draft client update memo	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.40	0.40	$238.00
05/27/2014	Lithium Ion Batteries	Batteries	confer with J. Block and J. Leviton re: staffing.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
05/28/2014	Lithium Ion Batteries	Batteries	Conference call with co-counsel re: client update; review/organize opposition briefs.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.30	0.30	$178.50
05/29/2014	Lithium Ion Batteries	Batteries	Finalize client update memos.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.50	0.50	$297.50
05/30/2014	Lithium Ion Batteries	Batteries	Email clients with status report	(7) Document Review	$595.00 hr	0.80	0.80	$476.00
05/30/2014	Lithium Ion Batteries	Batteries	Assist L. O'Neil with locating operative documents to prepare for document review; begin reviewing same.	(7) Document Review	$595.00 hr	1.00	1.00	$595.00

06/03/2014	Lithium Ion Batteries	Batteries	Client update.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
06/12/2014	Lithium Ion Batteries	Batteries	Update status memo and transmit to clients; review CMO and calendar dates.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
06/14/2014	Lithium Ion Batteries	Batteries	Resolve issue with client's email address; resend client update.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
12/08/2014	Lithium Ion Batteries	Batteries	Review recent order.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcrip	$595.00 hr	0.40	0.40	$238.00
				Total Labor For Whitney Street		**11.15**	**11.15**	**$6,634.25**
					Grand Total	**251.05**	**251.05**	**$90,690.25**

Block & Leviton LLP - User Time and Lodestar Summary

Date Start: 1/1/2015 | Date End: 12/31/2015 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Daniel Fishman								
05/29/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	3.80	3.80	$703.00
06/01/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	0.40	0.40	$74.00
06/02/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	0.60	0.60	$111.00
06/03/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	2.40	2.40	$444.00
06/04/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	4.10	4.10	$758.50
06/09/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	0.70	0.70	$129.50
06/10/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	2.20	2.20	$407.00
06/11/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$185.00 hr	0.50	0.50	$92.50
Total Labor For Daniel Fishman						**14.70**	**14.70**	**$ 2,719.50**
Erica Langsen (née Sorg)								
05/12/2015	Lithium Ion Batteries	Batteries	Research [redacted]	(1) Investigations, Factual Research	$350.00 hr	5.10	5.10	$1,785.00

Total Labor For Erica Langsen						**5.10**	**5.10**	**$1,785.00**
Jeff Block								
08/27/2015	Lithium Ion Batteries	Batteries	Conf LEW re: case staffing and strategy	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.50	0.50	$350.00
Total Labor For Jeff Block						**0.50**	**0.50**	**$350.00**
Julie Ledwig								
01/08/2015	Lithium Ion Batteries	Batteries	Revise notice of change of firm affiliation and address for L. Weaver, and register LW for ECF.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.00	1.00	$225.00
01/08/2015	Lithium Ion Batteries	Batteries	Register LW for ECF.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.10	0.10	$22.50
01/13/2015	Lithium Ion Batteries	Batteries	Revise change of address notice for L. Weaver to reflect new Oakland office location.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.10	0.10	$22.50
01/21/2015	Lithium Ion Batteries	Batteries	Revise change of address notice for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.20	0.20	$45.00
01/28/2015	Lithium Ion Batteries	Batteries	Update pleadings index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
02/13/2015	Lithium Ion Batteries	Batteries	Calendar upcoming events/deadlines.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.70	0.70	$157.50
03/11/2015	Lithium Ion Batteries	Batteries	Calendar court deadlines.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
03/13/2015	Lithium Ion Batteries	Batteries	Finalize and efile Notice of Change of Address for L. Weaver	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.40	0.40	$90.00
04/23/2015	Lithium Ion Batteries	Batteries	Calendar discovery deadlines; search for preservation letter and e-mails to/from L. Weavery regarding same.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.30	0.30	$67.50
04/29/2015	Lithium Ion Batteries	Batteries	Draft shell RPD and ROG responses for both City of Richmond and Palo Alto clients	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	2.00	2.00	$450.00

04/29/2015	Lithium Ion Batteries	Batteries	Save client documents to the system; e-mails from/to L. Weaver, L. O'Neil regarding same.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.30	0.30	$67.50
04/30/2015	Lithium Ion Batteries	Batteries	Revise Response to Defendants' RPDs.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.30	0.30	$67.50
05/06/2015	Lithium Ion Batteries	Batteries	Case management of incoming client documents and prepare same for production.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	2.00	2.00	$450.00
05/07/2015	Lithium Ion Batteries	Batteries	Bates label production documents and stamp confidential; e-mails from/to L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.70	0.70	$157.50
05/08/2015	Lithium Ion Batteries	Batteries	Revise Palo Alto Production; emails from/to L. Weaver regarding same; save written discovery to the system.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.40	0.40	$90.00
05/18/2015	Lithium Ion Batteries	Batteries	Finalize and electronically serve Interrogatory Responses and Richmond production documents to all parties; e-mails to/from L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.80	1.80	$405.00
05/27/2015	Lithium Ion Batteries	Batteries	Save incoming Palo Alto documents to the system and emails from/to L. Weaver regarding production; bates stamp documents in preparation for June production.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.70	0.70	$157.50
05/28/2015	Lithium Ion Batteries	Batteries	Prepare/finalize PaloAlto production documents and emails to/from L. Weaver, co-counsel regarding same.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.00	1.00	$225.00
05/29/2015	Lithium Ion Batteries	Batteries	E-mails to/from co-counsel and L. Weaver regarding draft production documents; finalize production documents and revise Interrogatory responses.	(3) Drafting Discovery Answers/Responses	$225.00 hr	0.60	0.60	$135.00
06/09/2015	Lithium Ion Batteries	Batteries	Revise terms list discovery letter and e-mails to/from L. Weaver regarding same; finalize and serve letter upon all counsel via e-mail.	(2) Drafting Discovery Requests	$225.00 hr	1.50	1.50	$337.50
06/11/2015	Lithium Ion Batteries	Batteries	Case management of preservation letters and discovery.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.25	0.25	$56.25
06/12/2015	Lithium Ion Batteries	Batteries	Update attorney service list.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
07/07/2015	Lithium Ion Batteries	Batteries	Draft time and expense report for June.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.75	1.75	$393.75
07/31/2015	Lithium Ion Batteries	Batteries	Create 2nd quarter T&E report and e-mails to/from L. Weaver regarding same.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.70	1.70	$382.50
08/03/2015	Lithium Ion Batteries	Batteries	Emails to/from J. Anderson, K. Good regarding time and expenses.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.10	0.10	$22.50

09/01/2015	Lithium Ion Batteries	Batteries	Draft notice of change of address for L. Weaver.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.15	0.15	$33.75
09/10/2015	Lithium Ion Batteries	Batteries	Draft/revise and e-file Notice of Change of address for L. Weaver and W. Street; arrange with vendor for production/delivery of mandatory chambers copies.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.70	0.70	$157.50
10/14/2015	Lithium Ion Batteries	Batteries	Bates/confidential stamp client documents in preparation for production to opposing counsel.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.90	0.90	$202.50
10/16/2015	Lithium Ion Batteries	Batteries	Save finalized 10/14/2015 production documents to the system.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.10	0.10	$22.50
10/16/2015	Lithium Ion Batteries	Batteries	Calendar upcoming briefing and hearing deadlines.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.40	0.40	$90.00
11/09/2015	Lithium Ion Batteries	Batteries	Calendar upcoming hearing and filing deadline.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.15	0.15	$33.75
12/03/2015	Lithium Ion Batteries	Batteries	Calendar upcoming hearing and briefing deadlines.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.30	0.30	$67.50
Total Labor For Julie Ledwig						**21.20**	**21.20**	**$ 4,770.00**

Kasey Sullivan

06/08/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	$350.00 hr	0.60	0.60	$210.00
06/09/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	$350.00 hr	1.20	1.20	$420.00
06/18/2015	Lithium Ion Batteries	Batteries	Training for batteries document review.	(7) Document Review	$350.00 hr	1.20	1.20	$420.00
07/02/2015	Lithium Ion Batteries	Batteries	Email with Yunah Rha re batteries document review.	(7) Document Review	$350.00 hr	0.10	0.10	$35.00
Total Labor For Kasey Sullivan						**3.10**	**3.10**	**$ 1,085.00**

Leigh O'Neil

04/29/2015	Lithium Ion Batteries	Batteries	Draft RPD responses for Palo Alto	(3) Drafting Discovery Answers/Responses	$395.00 hr	2.90	2.90	$1,145.50
05/01/2015	Lithium Ion Batteries	Batteries	Draft Interrogatory Responses for Palo Alto and Richmond	(3) Drafting Discovery Answers/Responses	$395.00 hr	3.50	3.50	$1,382.50
05/05/2015	Lithium Ion Batteries	Batteries	Draft client verification forms; send discovery responses to LEW	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	1.40	1.40	$553.00
05/19/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	8.10	8.10	$3,199.50
05/20/2015	Lithium Ion Batteries	Batteries	Draft chart analyzing Richmond purchases	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	3.90	3.90	$1,540.50
06/02/2015	Lithium Ion Batteries	Batteries	Prepare spreadsheet documenting Richmond's purchases	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	3.10	3.10	$1,224.50
06/11/2015	Lithium Ion Batteries	Batteries	compile document review materials	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.80	0.80	$316.00
06/12/2015	Lithium Ion Batteries	Batteries	Review fraudulent concealment documents; update Richmond damages spreadsheet	(7) Document Review	$350.00 hr	7.10	7.10	$2,485.00
06/15/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	8.20	8.20	$3,239.00
06/17/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	8.20	8.20	$3,239.00
06/18/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	8.30	8.30	$3,278.50
06/19/2015	Lithium Ion Batteries	Batteries	Draft Batteries Damages Spreadsheet	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	2.10	2.10	$829.50
Total Labor For Leigh O'Neil						**57.60**	**57.60**	**$22,432.50**

Lesley Weaver

04/02/2015	Lithium Ion Batteries	Batteries	Confer with client regarding request for waiver from Orrick firm to represent Sony; confer with co-lead counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.80	0.80	$520.00

04/17/2015	Lithium Ion Batteries	Batteries	Review and analyze correspondence from defendants re: written discovery; blonder with co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.60	0.60	$390.00
04/18/2015	Lithium Ion Batteries	Batteries	Outline issues for discussion in written discovery propounded on public entities;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	0.80	0.80	$520.00
04/20/2015	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with co-counsel re strategy on responding to written discovery;	(6) Discovery Meet & Confer	$650.00 hr	0.80	0.80	$520.00
04/21/2015	Lithium Ion Batteries	Batteries	Confer with client re: preparation of responses to discovery;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.70	0.70	$455.00
04/22/2015	Lithium Ion Batteries	Batteries	Review and analyze defendants' discovery responses; confer with co-lead counsel re: same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	1.60	1.60	$1,040.00
04/23/2015	Lithium Ion Batteries	Batteries	Coordinate with client re: discovery requests and search for responsive documents;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.60	0.60	$390.00
04/27/2015	Lithium Ion Batteries	Batteries	Coordinate re interviews of candidate speaking Japanese or Korean to assist with discovery;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.30	1.30	$845.00
04/27/2015	Lithium Ion Batteries	Batteries	Coordinate with Palo Alto and Richmond re document collection and review for production; coordinate with SC at Renne Sloane re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.30	1.30	$845.00
04/28/2015	Lithium Ion Batteries	Batteries	Coordinate with client and with steve Cikes re: responses to written discovery and collection of documents; Coordinate on site meetings; communicate with co-lead counsel re: same	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.90	1.90	$1,235.00
04/29/2015	Lithium Ion Batteries	Batteries	Coordinate issues to be considered in impending document review;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.40	0.40	$260.00
04/29/2015	Lithium Ion Batteries	Batteries	Review and revise draft discovery responses; coordinate with clients re: same;	(3) Drafting Discovery Answers/Responses	$650.00 hr	1.60	1.60	$1,040.00
04/30/2015	Lithium Ion Batteries	Batteries	Analyze defendants' discovery and outline objections; confer with LO re drafting responses;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	0.80	0.80	$520.00
05/04/2015	Lithium Ion Batteries	Batteries	Revise and send draft discovery to clients;	(3) Drafting Discovery Answers/Responses	$650.00 hr	1.60	1.60	$1,040.00
05/05/2015	Lithium Ion Batteries	Batteries	Confer with client re written discovery responses and next steps on verifications, etc; develop plan for additional document searches;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.30	1.30	$845.00
05/06/2015	Lithium Ion Batteries	Batteries	Revise written discovery responses; develop strategy going forward; coordinate additional searches;	(3) Drafting Discovery Answers/Responses	$650.00 hr	2.30	2.30	$1,495.00

05/06/2015	Lithium Ion Batteries	Batteries	Receive and review document production from client; analyze same; coordinate production;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.50	1.50	$975.00
05/07/2015	Lithium Ion Batteries	Batteries	Prepare for and attend meeting with Richmond re document collection and discovery responses;	(6) Discovery Meet & Confer	$650.00 hr	2.60	2.60	$1,690.00
05/07/2015	Lithium Ion Batteries	Batteries	Draft and revise interrogatory responses for Richmond; follow up on factual research for certain responses;	(3) Drafting Discovery Answers/Responses	$650.00 hr	2.40	2.40	$1,560.00
05/08/2015	Lithium Ion Batteries	Batteries	Coordinate re extension of time to respond; review and revise responses; prepare Richmond documents for production;	(3) Drafting Discovery Answers/Responses	$650.00 hr	2.30	2.30	$1,495.00
05/12/2015	Lithium Ion Batteries	Batteries	Coordinate research re impact of autos decision in batteries case;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.40	1.40	$910.00
05/14/2015	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re extension on time to respond;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
05/17/2015	Lithium Ion Batteries	Batteries	Prepare documents and responses for production;	(3) Drafting Discovery Answers/Responses	$650.00 hr	0.80	0.80	$520.00
05/18/2015	Lithium Ion Batteries	Batteries	Travel to and meet with client at Richmond regarding document collection and production;	(6) Discovery Meet & Confer	$650.00 hr	2.50	2.50	$1,625.00
05/18/2015	Lithium Ion Batteries	Batteries	Consider and agree to waiver for defense firm that represents in Richmond in other matters; confer re same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.60	0.60	$390.00
05/20/2015	Lithium Ion Batteries	Batteries	Coordinate with In house counsel Felecia Gross re verification and progress in document collection;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.40	0.40	$260.00
05/26/2015	Lithium Ion Batteries	Batteries	Review and analyze documents produced by Palo Alto; coordinate preparation for production; confer with co-counsel re same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	1.80	1.80	$1,170.00
05/27/2015	Lithium Ion Batteries	Batteries	Prepare for and attend coordination call with co-lead counsel on discovery responses;	(6) Discovery Meet & Confer	$650.00 hr	0.80	0.80	$520.00
05/29/2015	Lithium Ion Batteries	Batteries	Review and revise Palo Alto responses in preparation for service; review document production re: same;	(7) Document Review	$650.00 hr	1.10	1.10	$715.00
06/08/2015	Lithium Ion Batteries	Batteries	Meet with and train new document reviewer; orient her on the case;	(7) Document Review	$650.00 hr	0.80	0.80	$520.00
06/09/2015	Lithium Ion Batteries	Batteries	Draft and revise letter to defendants re: search terms; send letter;	(7) Document Review	$650.00 hr	0.80	0.80	$520.00

06/09/2015	Lithium Ion Batteries	Batteries	Follow up with clients re search terms and custodians in preparation for meet and confer with defendants:	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.80	0.80	$520.00
06/11/2015	Lithium Ion Batteries	Batteries	Coordinate with Yunah Rha re document review; review and analyze hot documents to send to clients;	(7) Document Review	$650.00 hr	1.20	1.20	$780.00
06/11/2015	Lithium Ion Batteries	Batteries	Coordinate with clients re follow up document searches, custodians and search terms;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
06/19/2015	Lithium Ion Batteries	Batteries	Prepare for and discuss with S Cikes case status and document collection for both Palo Alto and Richmond; discuss document analysis;coordinate follow up with clients in various issues;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.40	1.40	$910.00
06/20/2015	Lithium Ion Batteries	Batteries	Review and analyze draft summary of Richmond purchases;	(7) Document Review	$650.00 hr	0.40	0.40	$260.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze Toshiba motion for summary judgment;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	0.70	0.70	$455.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze document; confer with YR re same;	(7) Document Review	$650.00 hr	0.10	0.10	$65.00
07/07/2015	Lithium Ion Batteries	Batteries	Meet with YR and discuss document review progress and protocols; prepare for and attend weekly call re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.30	1.30	$845.00
07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze documents reviewed by Yr; discuss significance;	(7) Document Review	$650.00 hr	0.10	0.10	$65.00
07/10/2015	Lithium Ion Batteries	Batteries	Confer with YR re doc review status and weekly summaries;	(6) Discovery Meet & Confer	$650.00 hr	0.30	0.30	$195.00
07/15/2015	Lithium Ion Batteries	Batteries	Meet with YR and discuss status of document review; review and analyze sample documents; prepare for and attend portion of call with other reviewers;	(7) Document Review	$650.00 hr	0.90	0.90	$585.00
08/20/2015	Lithium Ion Batteries	Batteries	Review YR's document summaries; assess status of document review; coordinate upcoming review strategy;	(7) Document Review	$650.00 hr	0.50	0.50	$325.00
08/25/2015	Lithium Ion Batteries	Batteries	Confer with BG re document review and case management issues;	(6) Discovery Meet & Confer	$650.00 hr	0.40	0.40	$260.00
08/27/2015	Lithium Ion Batteries	Batteries	Confer with JB re: work assignments and case management;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.20	0.20	$130.00
09/03/2015	Lithium Ion Batteries	Batteries	Review briefly packers materials to be analyzed by YR;	(7) Document Review	$650.00 hr	0.40	0.40	$260.00

09/08/2015	Lithium Ion Batteries	Batteries	Confer re new document review project for YR; brief analysis of packers documents;	(7) Document Review	$650.00 hr	0.30	0.30	$195.00
09/14/2015	Lithium Ion Batteries	Batteries	Follow up with co-counsel re: discovery questions for clients;	(6) Discovery Meet & Confer	$650.00 hr	0.20	0.20	$130.00
09/15/2015	Lithium Ion Batteries	Batteries	Follow up re time period of document searches performed by clients; confer with various co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.70	0.70	$455.00
09/18/2015	Lithium Ion Batteries	Batteries	Confer with Y. Rha re: new document assignment and importance of capacity restriction docs;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
09/19/2015	Lithium Ion Batteries	Batteries	Follow up with JG re: potential nonprofit client, etc;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
09/25/2015	Lithium Ion Batteries	Batteries	Follow up re: client responses to discovery requests;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.20	0.20	$130.00
10/05/2015	Lithium Ion Batteries	Batteries	Confer with S. Williams re: case status and cessation of document review; confer re: assignment of depositions;	(6) Discovery Meet & Confer	$650.00 hr	0.70	0.70	$455.00
10/12/2015	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: call with S. Williams re: preparation of municipal entities for dep and strategy on class cert;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.10	0.10	$65.00
10/13/2015	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: preparing document production and responses to Toshiba's follow up requests;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.40	0.40	$260.00
10/14/2015	Lithium Ion Batteries	Batteries	Review documents collected for production for responsiveness; review and correct issues with Bates stamping; prepare documents for production and coordinate with co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	1.70	1.70	$1,105.00
10/14/2015	Lithium Ion Batteries	Batteries	Prepare and finalize documents for production; coordinate with clients and co-counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.90	0.90	$585.00
11/05/2015	Lithium Ion Batteries	Batteries	Coordinate with various co-counsel regarding call to discuss discovery of public entities and strategy re: same;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
11/06/2015	Lithium Ion Batteries	Batteries	Confer with Y. Rha re: review of client documents and creating summary chart;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.30	0.30	$195.00
11/06/2015	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with S. Williams and L. Renne re: preparation of municipal clients for deposition and assignment of depositions in the action;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.70	0.70	$455.00
12/22/2015	Lithium Ion Batteries	Batteries	Review and analyze summary of client documents and identify [redacted]	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$650.00 hr	0.70	0.70	$455.00

12/22/2015	Lithium Ion Batteries	Batteries	Follow up with co-lead counsel re: defendants' request to schedule depositions of public entities;	(11) Litigation Strategy, Analysis & Case Management	$650.00 hr	0.40	0.40	$260.00
Total Labor For Lesley Weaver						**55.70**	**55.70**	**$ 36,205.00**
Whitney Street								
03/05/2015	Lithium Ion Batteries	Batteries	Confer with J. Block regarding staffing.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.15	0.15	$89.25
08/26/2015	Lithium Ion Batteries	Batteries	Discuss case with Y. Rha.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.25	0.25	$148.75
08/27/2015	Lithium Ion Batteries	Batteries	Discuss case/staffing with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.15	0.15	$89.25
10/05/2015	Lithium Ion Batteries	Batteries	Confer with team re: status/strategy.	(11) Litigation Strategy, Analysis & Case Management	$595.00 hr	0.20	0.20	$119.00
Total Labor For Whitney Street						**0.75**	**0.75**	**$446.25**
Yunah Rah								
06/09/2015	Lithium Ion Batteries	Batteries	Review Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	0.50	0.50	$197.50
06/09/2015	Lithium Ion Batteries	Batteries	Reviewed Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	1.00	1.00	$395.00
06/10/2015	Lithium Ion Batteries	Batteries	Meeting with Kasey to review document review procedures	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	2.00	2.00	$790.00
06/10/2015	Lithium Ion Batteries	Batteries	Reviewed Complaint	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	6.00	6.00	$2,370.00
06/10/2015	Lithium Ion Batteries	Batteries	Reviewed Protective Order	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	0.50	0.50	$197.50

06/11/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing LIB - Fraudulent Concealment Docs D/L Link	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
06/11/2015	Lithium Ion Batteries	Batteries	Review/analyze LIB - Fraudulent Concealment Docs D/L Link	(7) Document Review	$395.00 hr	1.40	1.40	$553.00
06/11/2015	Lithium Ion Batteries	Batteries	Reviewing Batteries Merits Review Manual	(7) Document Review	$395.00 hr	1.10	1.10	$434.50
06/11/2015	Lithium Ion Batteries	Batteries	Overview of Catalyst	(7) Document Review	$395.00 hr	0.10	0.10	$39.50
06/11/2015	Lithium Ion Batteries	Batteries	Reviewing coding/doc review procedures	(7) Document Review	$395.00 hr	0.10	0.10	$39.50
06/12/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs with Lesley Weaver	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
06/12/2015	Lithium Ion Batteries	Batteries	Review and analyze doc review call notes and updates to review manual & 20 best documents from Ari Lehman	(7) Document Review	$395.00 hr	0.80	0.80	$316.00
06/15/2015	Lithium Ion Batteries	Batteries	Register for catalyst webinar & print documents to review and prepare for webinar	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.40	0.40	$158.00
06/15/2015	Lithium Ion Batteries	Batteries	Reviewing document review call & updates to document review manual	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.25	0.25	$98.75
06/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Coding Manual; Cheat Sheet; LIB Batch Memo Template; Key Terms in prep for doc review webinar	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.70	1.70	$671.50
06/16/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs to send to clients	(7) Document Review	$395.00 hr	0.80	0.80	$316.00
06/17/2015	Lithium Ion Batteries	Batteries	Review and analyze corrected/revised manual	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.70	0.70	$276.50
06/17/2015	Lithium Ion Batteries	Batteries	Becoming familiar with doc review platform- Catalyst	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.40	0.40	$158.00
06/17/2015	Lithium Ion Batteries	Batteries	Attending document review training webinar	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.50	1.50	$592.50
06/18/2015	Lithium Ion Batteries	Batteries	Phone meeting with Lesley & Ronnie re: foreign language doc review translations/coding;	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00

06/18/2015	Lithium Ion Batteries	Batteries	Meeting with Kasey to go over Catalyst and hot docs	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.60	1.60	$632.00
06/18/2015	Lithium Ion Batteries	Batteries	Review and analyze hot docs to send to clients	(7) Document Review	$395.00 hr	0.50	0.50	$197.50
06/18/2015	Lithium Ion Batteries	Batteries	Review and analyze documents- Public Folders/5-15-2015 Set Review/LGC/Chung, Young Wook/K_CustReview_0001 LGC-MDL0039561 & LGC-MDL0039564	(7) Document Review	$395.00 hr	2.20	2.20	$869.00
06/18/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing first batch of Korean document review items	(7) Document Review	$395.00 hr	0.60	0.60	$237.00
06/19/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing documents for discovery	(7) Document Review	$395.00 hr	1.80	1.80	$711.00
06/22/2015	Lithium Ion Batteries	Batteries	Reviewing and analyzing documents for discovery	(7) Document Review	$395.00 hr	4.10	4.10	$1,619.50
06/23/2015	Lithium Ion Batteries	Batteries	Weekly document review conference call	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.70	0.70	$276.50
06/23/2015	Lithium Ion Batteries	Batteries	Review and analyze documents for discovery	(7) Document Review	$395.00 hr	3.60	3.60	$1,422.00
06/24/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	2.20	2.20	$869.00
06/24/2015	Lithium Ion Batteries	Batteries	Reviewing complaint, doc review manual, and key players	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
06/25/2015	Lithium Ion Batteries	Batteries	Phone conference with Korean Doc Review Coordinator-Shinae Kim-Helms reviewing past doc review work	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.60	0.60	$237.00
06/25/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	3.40	3.40	$1,343.00
06/26/2015	Lithium Ion Batteries	Batteries	Review and analyze list of characters and doc review manual	(7) Document Review	$395.00 hr	0.30	0.30	$118.50
06/26/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	3.50	3.50	$1,382.50
06/29/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	5.60	5.60	$2,212.00

06/30/2015	Lithium Ion Batteries	Batteries	Weekly doc review conference call	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
06/30/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	5.40	5.40	$2,133.00
07/01/2015	Lithium Ion Batteries	Batteries	Email from Ronnie regarding updated coding requirements	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/01/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	2.30	2.30	$908.50
07/01/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	2.70	2.70	$1,066.50
07/02/2015	Lithium Ion Batteries	Batteries	Conferring within firm regarding coding discovery document	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/02/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	1.50	1.50	$592.50
07/02/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	3.20	3.20	$1,264.00
07/03/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	0.60	0.60	$237.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents	(7) Document Review	$395.00 hr	6.20	6.20	$2,449.00
07/06/2015	Lithium Ion Batteries	Batteries	Review and analyze hot doc examples by issue (sent from Ronnie Spiegel).	(7) Document Review	$395.00 hr	0.40	0.40	$158.00
07/07/2015	Lithium Ion Batteries	Batteries	Corresponding within firm regarding discovery documents and "CA contacts" coding	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/07/2015	Lithium Ion Batteries	Batteries	Meeting with Lesley regarding documents reviewed and coded such as whether a certain document is considered a "CA Contact"; updates on progress and the type of documents reviewed	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.70	0.70	$276.50
07/07/2015	Lithium Ion Batteries	Batteries	Catalyst weekly conference call- updates on coding; Toshiba's SMJ; Defs' meetings (conspiracy v. opportunity contact); duplicate documents	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.60	0.60	$237.00
07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery - LGC's email correspondence; Business meeting minutes; sales & production reports	(7) Document Review	$395.00 hr	7.40	7.40	$2,923.00

07/07/2015	Lithium Ion Batteries	Batteries	Review and analyze Toshiba MSJ- declarations; Master Cast of Characters	(7) Document Review	$395.00 hr	0.10	0.10	$39.50
07/08/2015	Lithium Ion Batteries	Batteries	Reviewing email from Shinae Kim and Ronnie Spiegel re "CA contacts" and legitimate supplier/customer documents	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
07/08/2015	Lithium Ion Batteries	Batteries	Review and analyze discovery documents: meeting minutes; LGC Business performance reports and performance goals/reviews	(7) Document Review	$395.00 hr	6.50	6.50	$2,567.50
07/09/2015	Lithium Ion Batteries	Batteries	Email with Ronnie Spiegel and Shinae Kim re duplicate documents in catalyst and how to code	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/09/2015	Lithium Ion Batteries	Batteries	Communicate with Jessica Moy re general LIB overview (case strategy, timeline of case, upcoming depositions)	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.10	1.10	$434.50
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC 2004 performance analysis	(7) Document Review	$395.00 hr	3.60	3.60	$1,422.00
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze sample hot documents and Toshiba MSJ	(7) Document Review	$395.00 hr	1.60	1.60	$632.00
07/09/2015	Lithium Ion Batteries	Batteries	Review and analyze declaration of Fujimoto, Eguchi, and Kubo (Toshiba MSJ)	(7) Document Review	$395.00 hr	0.60	0.60	$237.00
07/10/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents: SEMC meeting minutes; LG US Data Book Volume 5; sorting out duplicate documents	(7) Document Review	$395.00 hr	5.30	5.30	$2,093.50
07/10/2015	Lithium Ion Batteries	Batteries	Email from Ronnie Spiegel re filling in correct "Dates" for coding in doc review project and making appropriate revisions on past doc review projects	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	0.30	0.30	$118.50
07/12/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents: company changes to production and plans	(7) Document Review	$395.00 hr	2.10	2.10	$829.50
07/13/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC's reports and Nintendo meeting minutes	(7) Document Review	$395.00 hr	7.60	7.60	$3,002.00
07/14/2015	Lithium Ion Batteries	Batteries	Weekly Catalyst conference call- updates on Toshiba SMJ, Toshiba depositions, meeting between defendants, co-conspirators, fraudulent concealment, English documents for FL reviewers	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.70	0.70	$276.50
07/14/2015	Lithium Ion Batteries	Batteries	Communication with Shinae Kim re: possible hot document- mention of Matsushima (Nokia) and price/costs; whether this is "meeting between defendants"; clarification on Matsushima (Nokia) and Matsushita (Panasonic); setting up bi-weekly Korean	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
07/14/2015	Lithium Ion Batteries	Batteries	Email from Hisun re: sample phrases for "fraudulent concealment"	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50

07/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Nokia documents and Motorola meeting minutes; Nokia workshop meetings	(7) Document Review	$395.00 hr	7.10	7.10	$2,804.50
07/15/2015	Lithium Ion Batteries	Batteries	Email correspondence & phone conference with Korean doc review coordinator, Shinae Kim, re irrelevant docs, "tabby connector," Chinese characters, and possible hot doc (LGC-MDL0041892)	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
07/15/2015	Lithium Ion Batteries	Batteries	Review and analyze March 2010 meeting minutes and cylindrical Performance Analysis Summary; LGC's polymer proposal value	(7) Document Review	$395.00 hr	7.20	7.20	$2,844.00
7/16/2015	Lithium Ion Batteries	Batteries	Review and analyze reports/emails on swelling/failed batteries and May 2011 SEMC Forecast Newsletter	(7) Document Review	$395.00 hr	2.70	2.70	$1,066.50
07/16/2015	Lithium Ion Batteries	Batteries	Review and analyze 2008 International Business Strategy reports and data by country; June 2004 Battery factory KPI performance	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00
07/17/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: RIM shipment status; quarterly sales percentages	(7) Document Review	$395.00 hr	3.50	3.50	$1,382.50
07/17/2015	Lithium Ion Batteries	Batteries	Review and analyze Battery Market Report - '10 review and '11 forecast: LIB Market demands, NBPC Market size, Smartphone OS Comparison Chart	(7) Document Review	$395.00 hr	3.60	3.60	$1,422.00
07/19/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents from Apple, i.e. meeting agendas	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
07/20/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: production and inventory status/action plans; 2009 Business plan reviews	(7) Document Review	$395.00 hr	7.90	7.90	$3,120.50
07/21/2015	Lithium Ion Batteries	Batteries	Review email from Shinae re past docs coded- coding English documents; cobalt price coding; updates on "fraudulent concealment" & making appropriate updates	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
07/21/2015	Lithium Ion Batteries	Batteries	Weekly Lithium Battery doc review call- new load of documents coming in from Defendants; moving through document review quicker; English documents in batch; dating the documents; Toshiba documents between 2003-2004; trade association coding	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.50	0.50	$197.50
07/21/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: Apple QBR reports and Hot doc- 2010 CM Business plan meeting minutes (adjusting sales prices according to lower cobalt prices and competing trends)	(7) Document Review	$395.00 hr	7.60	7.60	$3,002.00
07/22/2015	Lithium Ion Batteries	Batteries	Meeting with LW to discuss hot documents (cobalt prices) and memo assignment for timeline/overview of LGC's involvement with price fixing; updates on doc review team status and progress	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.00	1.00	$395.00
07/22/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: Nokia meeting reports/minutes; company scorecards for LGC	(7) Document Review	$395.00 hr	7.80	7.80	$3,081.00
07/23/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: company battery production capacities and reports	(7) Document Review	$395.00 hr	2.50	2.50	$987.50

07/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: investmenet strategies and inventory comparisons; Apple LIB shipment data for Japanese suppliers	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
07/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents: meeting minutes and weekly reports from Apple, Nokia, LGC, Microsoft	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
07/28/2015	Lithium Ion Batteries	Batteries	Weekly LIB conference call with Ronnie & Doc Review Team: irrelevant v. hot documents, summarizing hot documents for depositions, fraudulent concealment	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
07/28/2015	Lithium Ion Batteries	Batteries	Review and analyze N90 inventory request; FAR of N90 RMA issue (for Apple)	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
07/28/2015	Lithium Ion Batteries	Batteries	Batch memo for LGC Chung, Young Wook: K CustReview 0002	(7) Document Review	$395.00 hr	0.60	0.60	$237.00
07/28/2015	Lithium Ion Batteries	Batteries	Review and analyze business weekly report of overseas subsidiaries; Polymer Battery- Market Status and Basic Operations & Plant and inventory management tracking and planning	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
07/29/2015	Lithium Ion Batteries	Batteries	Email to Shinae & Ronnie regarding Coding Field Instructions for "Contracts"	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/29/2015	Lithium Ion Batteries	Batteries	Review and analyze supply, shipment, and performance plans; K93 WIP report-LGC Preliminary Plan	(7) Document Review	$395.00 hr	4.30	4.30	$1,698.50
07/29/2015	Lithium Ion Batteries	Batteries	Review and analyze discussion of prices/costs for Apple K20; Apple N88 GG DVT AUDIT Corrective Action Report and PCM function test parameter	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
07/30/2015	Lithium Ion Batteries	Batteries	Draft internal memo re LGC's involvement with LIB case as defendants and overview of case in preparation for depositions	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	3.40	3.40	$1,343.00
07/30/2015	Lithium Ion Batteries	Batteries	email to Ronnie & Shinae to update LGC factory location (Ochang, Korea)	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
07/30/2015	Lithium Ion Batteries	Batteries	Review and analyze K20 new program (Capacity simulation, design review, sample lead time)	(7) Document Review	$395.00 hr	3.50	3.50	$1,382.50
07/30/2015	Lithium Ion Batteries	Batteries	Review and analyze internal shipment plans and inventories	(7) Document Review	$395.00 hr	2.20	2.20	$869.00
07/31/2015	Lithium Ion Batteries	Batteries	Review and analyze 2009 NBPC line-up; December polymer shipment plan	(7) Document Review	$395.00 hr	4.40	4.40	$1,738.00
07/31/2015	Lithium Ion Batteries	Batteries	Review and analyze sales and production results; battery testing reports	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00

08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Industrial design & industrial design review (by Gossamer from Apple) & Pegatron LEON 1S1P 1530mAh Battery Pack Design Review and Test Plan	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00
08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple shipping schedules/models and daily production reports	(7) Document Review	$395.00 hr	2.10	2.10	$829.50
08/03/2015	Lithium Ion Batteries	Batteries	Review and analyze battery specs reports, tests, and audits; demand forecast	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
08/04/2015	Lithium Ion Batteries	Batteries	LIB Weekly Conference Call: clarification for "contracts" coding; skipping coded documents	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
08/04/2015	Lithium Ion Batteries	Batteries	Review and analyze battery line audits, battery certifications, and N58/N72 cell daily report & defect data	(7) Document Review	$395.00 hr	4.80	4.80	$1,896.00
08/04/2015	Lithium Ion Batteries	Batteries	Review and analyze CNY Shut-down Plan- LGC; Apple N82 York C-tech visit schedule on 7/17; Apple FCT update (N58/72/82/88) from LGC reply	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/05/2015	Lithium Ion Batteries	Batteries	Review and analyze monthly forecasts and shipping requests (Palladium)	(7) Document Review	$395.00 hr	5.20	5.20	$2,054.00
08/05/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple Weekly Meeting reports; various company meeting minutes	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00
08/06/2015	Lithium Ion Batteries	Batteries	Review and analyze LG N58, N72, N82 & Post Ramp Qual Batteries Conference Call- production and delivery plan	(7) Document Review	$395.00 hr	4.70	4.70	$1,856.50
08/07/2015	Lithium Ion Batteries	Batteries	Communicate with Lesley Weaver re documents reviewed this past week: LGC setting prices for cells, Apple's request for increase in production, technical documents	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
08/07/2015	Lithium Ion Batteries	Batteries	Email from Shinae Kim re past doc review batch memo and feedback	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
08/07/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC C-tech labor issue; N58 battery-LGC pack audit MIL and CAR; FAR for Apple N58 DVTa IQC fail	(7) Document Review	$395.00 hr	7.40	7.40	$2,923.00
08/10/2015	Lithium Ion Batteries	Batteries	Review and analyze email correspondence updates on daily production reports, inventory status requests, issues with cells/batteris and shipment plans for batteries/cells	(7) Document Review	$395.00 hr	8.10	8.10	$3,199.50
08/11/2015	Lithium Ion Batteries	Batteries	Email to Ronnie Spiegel & Shinae Kim with DW Lee 2 Batch Memo attachment.	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
08/11/2015	Lithium Ion Batteries	Batteries	Weekly LIB Conference Call: Defendant communications and whether it is legitimate; Toshiba's communications with other defendants during 2003-2004 (sale of its equipment); indicating the source of the information; Ronnie to leave LIB project and new director to come on	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.40	0.40	$158.00

08/11/2015	Lithium Ion Batteries	Batteries	Review and note Chinese character documents for batch memo	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/11/2015	Lithium Ion Batteries	Batteries	Review and analyze Palladium cell damage- CAR for N18 bottom leakage issues in CSMC; company meeting minutes and pricing memos	(7) Document Review	$395.00 hr	7.30	7.30	$2,883.50
08/12/2015	Lithium Ion Batteries	Batteries	Review and analyze sales Plans and Review of Past Sales Results	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/12/2015	Lithium Ion Batteries	Batteries	Email from Ronnie regarding naming LIB batch memos	(7) Document Review	$395.00 hr	0.10	0.10	$39.50
08/12/2015	Lithium Ion Batteries	Batteries	Review and analyze safety procedures: grading methods, solution reviews, corrective actions and improvements.	(7) Document Review	$395.00 hr	4.30	4.30	$1,698.50
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Nexcon PCM Issue Plan Meeting Minutes; SEMC 2009 Business Plan and 2010-2012 Progress Plan Progress/Forecast	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze inventory requests for various companies, and Shenzhen Office Pack analysis of key equipment investment cost and adjustments	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Brazil specifications for cell phone batteries.	(7) Document Review	$395.00 hr	1.90	1.90	$750.50
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC N94 Cell Engineering; N94 Battery LGC Proto 3 Final CL Reports; N18 Battery Spec	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Data for 2008-2011 Apple Long-Term Plans: Standards for Objective Setting #3, Competitive Structure, Price Level; end of November K6 event	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
08/14/2015	Lithium Ion Batteries	Batteries	Review and analyze battery sales plan updates, budgets for swelling issues, and production schedules with shipment requests by multiple companies	(7) Document Review	$395.00 hr	4.60	4.60	$1,817.00
08/17/2015	Lithium Ion Batteries	Batteries	Review and analyze daily reports, production and organization schedules, and chip allocations	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/17/2015	Lithium Ion Batteries	Batteries	Review and analyze reported batteries issues (adhesive tap turnup issue, sorting result defects)	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/18/2015	Lithium Ion Batteries	Batteries	Review and analyze customers' shipment requests and inventory reports	(7) Document Review	$395.00 hr	8.20	8.20	$3,239.00
08/19/2015	Lithium Ion Batteries	Batteries	Review and analyze updated shipment requests from Apple Forecast, and email between DW Lee, Apple and Toshiba that shows Opportunity Contact & Toshiba Withdrawl because communication with Toshiba (Toshiba's SML that they exited LIB market in 2004)	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00

08/19/2015	Lithium Ion Batteries	Batteries	Review and analyze N18 LGC Battery Preliminary Specification- Proto 2 Deliverables; LG Suzhou RoHS Meeting minutes and forecast	(7) Document Review	$395.00 hr	4.50	4.50	$1,777.50
08/20/2015	Lithium Ion Batteries	Batteries	Email communications with Korean doc review team (Shinae Kim, Jessica Jeong, Jongguk Choi, Jessica Jeong) re key packers and involvement with conspiracy & key documents with antitrust concerns involving competitors' prices	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
08/20/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple Vendor Information- iPhone iPod ISS check in October & Sales quantity; Apple Pack N72 Purchase Materials & Shipping History; Apple N88 Battery: TI BQ GG IC Risk PO Release to PVT/Ramp	(7) Document Review	$395.00 hr	4.40	4.40	$1,738.00
08/20/2015	Lithium Ion Batteries	Batteries	Review and analyze TEBS May 2009 Monthly Closing Report; TEBS N58, N72, May Apple Pack Shipping Report, Additional Fee, Swap and Replacement List, Sample Delivery List	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
08/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC Documents (DW Lee): re-reviewing coded documents to find mention of packers Celxpert Energy Corporation, Dynapack International Technology Corporation, and Simplo Technology, Inc. to verify any conspiratorial communications	(7) Document Review	$395.00 hr	4.10	4.10	$1,619.50
08/21/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC-Dynapack Meeting Minutes re grading project and printing barcodes; Palladium Electronics Production Plan	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/24/2015	Lithium Ion Batteries	Batteries	Review and analyze N88 LGC EVT2 Feedback, Data Review and Production Cycle Time Analysis, N88 Battery Pack Manufacturing Process, DVT+; N72 Dimension Inspection Report, and shipment plans/updates	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/24/2015	Lithium Ion Batteries	Batteries	Email correspondence with Korean doc review team & phone call with Shinae re packers and new focus on Celxpert, Dynapack and Simplo's communication and possible collusion	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/24/2015	Lithium Ion Batteries	Batteries	Review and analyze Internal LGC email re report and comment on meeting with Taiwanese packers (HP Pre-Meeting), price increase reports and Implementation Measures	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/25/2015	Lithium Ion Batteries	Batteries	Review and analyz LGC Pack Manager's Schedule/Agenda to visit Packers domestically (Korea) and in China; Packer's budget proposal	(7) Document Review	$395.00 hr	4.10	4.10	$1,619.50
08/25/2015	Lithium Ion Batteries	Batteries	Review and analyze HP Talking Points, intinerary, and meeting minutes	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
08/26/2015	Lithium Ion Batteries	Batteries	Review and analyze Cobalt Market Outlook Report for 2007, market average/monthly forecast reports, and price matrices	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/26/2015	Lithium Ion Batteries	Batteries	Meeting with Whitney document review findings	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/26/2015	Lithium Ion Batteries	Batteries	Review and analyze internal LGC communications discussing changes to expected sales earnings for February (Nokia, LE, SEMC, HP) and for different types of batteries; Customer-specific issues (HP, Dell, Packers) for March 2011 such as shipment status, affect of Japanese	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
08/26/2015	Lithium Ion Batteries	Batteries	Email thread with Korean Doc Review team of hot documents related to packers' involvement with collusion and clarification on legitimate meetings with packers	(7) Document Review	$395.00 hr	4.70	4.70	$1,856.50

08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze sales plans, activity reviews, and shipment/allocation updates for several companies	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze other coded documents by Korean team considered "hot" such as packers deciding pricing on cells, LGC's price increase on HP, code words for SDI (Cheonam Company) and HD (Houston Company)	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
08/27/2015	Lithium Ion Batteries	Batteries	Review and analyze coded documents from Chinese group re communications between Panasonic and SMP about competitor's prices	(7) Document Review	$395.00 hr	2.90	2.90	$1,145.50
08/28/2015	Lithium Ion Batteries	Batteries	Email communication with Korean Packer Doc Review Team (JG Choi, SN Kim, S Scarlett, J Jeong, H Hsu) re Packer Assignment Updates	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
08/28/2015	Lithium Ion Batteries	Batteries	Review and analyze issue updates (management and product) and business plans for upcoming quarters.	(7) Document Review	$395.00 hr	4.30	4.30	$1,698.50
08/31/2015	Lithium Ion Batteries	Batteries	Review and analyze 2011 Taiwan Corporate Business Report (cell) describing Taiwan Corporate team organization and packer updates; HP shipment report	(7) Document Review	$395.00 hr	3.40	3.40	$1,343.00
08/31/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC Meeting Reports re: pack price, e-bidding pushback, and meeting minutes (ITT and Panasonic meetings)	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
09/01/2015	Lithium Ion Batteries	Batteries	Review and analyze Customer-Specific Personnel (for HP, Dell, Asus, Acer, Lenovo, Toshiba); HP Business Discussion (key drivers, execution of LTA, HP's involvement over packers)	(7) Document Review	$395.00 hr	4.30	4.30	$1,698.50
09/01/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Meeting in Korea Meeting Materials: "Confidential" Handwritten notes for Analysis on cell Shares in Packers (% from Jan-May for Sony, Sanyo, SDI, MBI, LGC), Pack Share Trend & Implications	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze HP and Dell organizational charts of working groups, key people, and development teams	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Business Discussion at the LGC Office in Taipei- expected shipment, e-bidding rule, cell allocation meeting, OOC	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
09/02/2015	Lithium Ion Batteries	Batteries	Review and analyze Overseas branch business meeting report- LGC TW- Week of 10/27/2008-10/31 Progress & Week of 11/3-11/7 Action Plans for each Customer	(7) Document Review	$395.00 hr	2.40	2.40	$948.00
09/03/2015	Lithium Ion Batteries	Batteries	Review and analyze business status and meeting minutes Apple and HP) and quarterly analysis/improvement points.	(7) Document Review	$395.00 hr	8.20	8.20	$3,239.00
09/03/2015	Lithium Ion Batteries	Batteries	Draft and review batch memo for Packers 1	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
09/04/2015	Lithium Ion Batteries	Batteries	Review and analyze Apple- Motorola CRM Weekly Meeting; Market data for total overseas market, HP, Dell, and Acer market & annual business travel info	(7) Document Review	$395.00 hr	7.80	7.80	$3,081.00

09/05/2015	Lithium Ion Batteries	Batteries	Review and analyze HP-LGC Talking Point- MU E-Bidding Price, Share Simulation, Operating Profit Comparison ($17 best, $18 worst price bids)	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
09/08/2015	Lithium Ion Batteries	Batteries	Email from Marc Pilotic (Lieff Cabraser) re new doc review assignment/project; review excel spreadsheet to be filled for new project	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.25	0.25	$98.75
09/08/2015	Lithium Ion Batteries	Batteries	Email to Shana Scarlett and Shinae Kim-Helms re batch memo for Packers 2 folder doc review	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
09/08/2015	Lithium Ion Batteries	Batteries	Phonecall with Marc Pilotin re new doc review project for cell capacity/specifications	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.30	0.30	$118.50
09/09/2015	Lithium Ion Batteries	Batteries	Call with M. Pilotin re coding documents for new capacity and spec project	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
09/09/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs related to cell capacity and specifications for Expert report	(7) Document Review	$395.00 hr	3.70	3.70	$1,461.50
09/10/2015	Lithium Ion Batteries	Batteries	Discuss new project (capacity) with LW	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
09/10/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	$395.00 hr	4.10	4.10	$1,619.50
09/11/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	$395.00 hr	4.10	4.10	$1,619.50
09/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	$395.00 hr	2.30	2.30	$908.50
09/15/2015	Lithium Ion Batteries	Batteries	Email exchange with M. Pilotin re case progress	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
09/15/2015	Lithium Ion Batteries	Batteries	Review and analyze documents re cylindrical cell capacity issues for expert report	(7) Document Review	$395.00 hr	4.70	4.70	$1,856.50
09/15/2015	Lithium Ion Batteries	Batteries	Review ORDER RE PLAINTIFFS' MOTION TO COMPEL DEPOSITION OF SEOK HWAN KWAK	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	0.40	0.40	$158.00
09/16/2015	Lithium Ion Batteries	Batteries	LIB Conference Call re doc review assignments and updates for expert reports	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
09/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG documents re capacity issues for expert report	(7) Document Review	$395.00 hr	8.90	8.90	$3,515.50

09/17/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG documents for expert report re cell capacity	(7) Document Review	$395.00 hr	2.40	2.40	$948.00
09/18/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean capacity documents for expert report	(7) Document Review	$395.00 hr	7.20	7.20	$2,844.00
09/21/2015	Lithium Ion Batteries	Batteries	Call with M. Pilotin & J. Jeong to review new doc review assignment re LGC product roadmaps	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.40	0.40	$158.00
09/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LG docs re "product roadmaps"	(7) Document Review	$395.00 hr	6.90	6.90	$2,725.50
09/22/2015	Lithium Ion Batteries	Batteries	Review, analyze and code Korean LGC documents under search term "product roadmap" for experts	(7) Document Review	$395.00 hr	6.00	6.00	$2,370.00
09/23/2015	Lithium Ion Batteries	Batteries	Conference call with M. Pilotin re progress of roadmap doc review for experts	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.10	0.10	$39.50
09/23/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents re product roadmaps for expert	(7) Document Review	$395.00 hr	4.20	4.20	$1,659.00
09/24/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for experts re product roadmaps and cell capacity/specifications	(7) Document Review	$395.00 hr	7.20	7.20	$2,844.00
09/25/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for expert deposition re product roadmaps and cell specifications	(7) Document Review	$395.00 hr	5.50	5.50	$2,172.50
09/26/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for expert deposition re product roadmaps and cell specs	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
09/28/2015	Lithium Ion Batteries	Batteries	Review, analyze and code documents for experts re product roadmaps and specifications	(7) Document Review	$395.00 hr	8.10	8.10	$3,199.50
09/29/2015	Lithium Ion Batteries	Batteries	Review and analyze "product roadmap" docs within LGC batch for expert	(7) Document Review	$395.00 hr	8.70	8.70	$3,436.50
09/30/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC documents for product roadmaps and spec for expert prep	(7) Document Review	$395.00 hr	4.00	4.00	$1,580.00
10/05/2015	Lithium Ion Batteries	Batteries	Phone conference with M. Pilotin re the week's doc review project re LGC roadmaps for experts	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.20	0.20	$79.00
10/05/2015	Lithium Ion Batteries	Batteries	Review, analyze and code LGC documents under search term "roadmap" for expert review	(7) Document Review	$395.00 hr	6.50	6.50	$2,567.50

10/06/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product codes for experts	(7) Document Review	$395.00 hr	3.50	3.50	$1,382.50
10/07/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product code docs for experts	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
10/08/2015	Lithium Ion Batteries	Batteries	Review and analyze product code documents for experts	(7) Document Review	$395.00 hr	3.70	3.70	$1,461.50
10/09/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC documents by product code names for experts	(7) Document Review	$395.00 hr	2.50	2.50	$987.50
10/12/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC product code docs for experts	(7) Document Review	$395.00 hr	5.70	5.70	$2,251.50
10/13/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC docs with product code name search terms for expert review	(7) Document Review	$395.00 hr	6.20	6.20	$2,449.00
10/14/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs of specific LIB Product Codes for expert	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
10/15/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC documents with specific LIB product code name search terms for experts	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
10/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LIB product code docs for expert	(7) Document Review	$395.00 hr	4.50	4.50	$1,777.50
10/19/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean docs by product code names for experts	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
10/20/2015	Lithium Ion Batteries	Batteries	Email correspondence with HS Kim, SH Kim, and M Pilotin re LIB doc translations for depo prep and other doc review assignments	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	0.40	0.40	$158.00
10/20/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean documents for hot docs re fraudulent concealment	(7) Document Review	$395.00 hr	6.50	6.50	$2,567.50
10/21/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean translations of DW Lee docs in prep for DW Lee depo	(7) Document Review	$395.00 hr	1.70	1.70	$671.50
10/21/2015	Lithium Ion Batteries	Batteries	Analyze and confirm hot documents from HS Rim	(7) Document Review	$395.00 hr	1.50	1.50	$592.50
10/21/2015	Lithium Ion Batteries	Batteries	Review LGC Korean docs by product specifications for experts	(7) Document Review	$395.00 hr	4.50	4.50	$1,777.50

10/22/2015	Lithium Ion Batteries	Batteries	Review and analyze English translations of Korean hot docs for DW Lee depo; Correspond with LIB Korean team re same	(7) Document Review	$395.00 hr	1.00	1.00	$395.00
10/22/2015	Lithium Ion Batteries	Batteries	Review and analyze Korean LGC docs by product code names	(7) Document Review	$395.00 hr	6.00	6.00	$2,370.00
10/26/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment & correspondence with LIB team re same	(7) Document Review	$395.00 hr	6.00	6.00	$2,370.00
10/27/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment	(7) Document Review	$395.00 hr	8.20	8.20	$3,239.00
10/28/2015	Lithium Ion Batteries	Batteries	Review translations of hot documents in preparation for deposition	(7) Document Review	$395.00 hr	0.80	0.80	$316.00
10/28/2015	Lithium Ion Batteries	Batteries	Review and analyze LGC/SDI docs for fraudulent concealment	(7) Document Review	$395.00 hr	4.70	4.70	$1,856.50
11/16/2015	Lithium Ion Batteries	Batteries	Review and analyze Def RFP & Pl Richmond & PA responses; draft chart for documents produced by Pl & possible objections or issues	(7) Document Review	$395.00 hr	3.70	3.70	$1,461.50
11/19/2015	Lithium Ion Batteries	Batteries	Review documents produced by clients and draft chart with responsive/unresponsive productions	(7) Document Review	$395.00 hr	5.50	5.50	$2,172.50
11/24/2015	Lithium Ion Batteries	Batteries	Review and analyze doc production by Pls; draft chart of findings to verify responsiveness to Def's ROGs & RFP	(7) Document Review	$395.00 hr	9.00	9.00	$3,555.00
11/25/2015	Lithium Ion Batteries	Batteries	Analyze Pl's doc production; draft chart verifying responsiveness	(7) Document Review	$395.00 hr	5.50	5.50	$2,172.50
12/02/2015	Lithium Ion Batteries	Batteries	Review and analyze Pl Richmond's doc production	(7) Document Review	$395.00 hr	3.00	3.00	$1,185.00
12/03/2015	Lithium Ion Batteries	Batteries	Review and analyze Def's ROG & RFP to Pl Richmond & Palo Alto; Richmond productions; draft chart of documents produced	(7) Document Review	$395.00 hr	8.50	8.50	$3,357.50
12/04/2015	Lithium Ion Batteries	Batteries	Review and analyze Richmond document production	(7) Document Review	$395.00 hr	2.00	2.00	$790.00
12/07/2015	Lithium Ion Batteries	Batteries	Review Richmond productions and classify each item as responsive/non-responsive	(7) Document Review	$395.00 hr	6.00	6.00	$2,370.00
12/08/2015	Lithium Ion Batteries	Batteries	Analyze Richmond productions; Review Palo Alto productions	(7) Document Review	$395.00 hr	7.10	7.10	$2,804.50

12/09/2015	Lithium Ion Batteries	Batteries	Analyze Palo Alto productions and draft memo for Def's RFP	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00
12/10/2015	Lithium Ion Batteries	Batteries	Analyze Richmond & PA productions; continue drafting memo	(7) Document Review	$395.00 hr	7.20	7.20	$2,844.00
12/11/2015	Lithium Ion Batteries	Batteries	Analyze responsiveness of PI's productions and draft/revise memo	(7) Document Review	$395.00 hr	5.00	5.00	$1,975.00
12/12/2015	Lithium Ion Batteries	Batteries	Revise memo for PI productions	(3) Drafting Discovery Answers/Responses	$395.00 hr	2.50	2.50	$987.50
12/14/2015	Lithium Ion Batteries	Batteries	Draft memo for Def's RFP	(2) Drafting Discovery Requests	$395.00 hr	5.50	5.50	$2,172.50
12/15/2015	Lithium Ion Batteries	Batteries	Review Complaint, Def ROGs, draft index chart & memo of IPP Productions	(3) Drafting Discovery Answers/Responses	$395.00 hr	7.00	7.00	$2,765.00
12/16/2015	Lithium Ion Batteries	Batteries	Review Def ROGs & revise index chart & memo of IPP Productions	(7) Document Review	$395.00 hr	5.50	5.50	$2,172.50
12/18/2015	Lithium Ion Batteries	Batteries	Revise IPP Production memo	(2) Drafting Discovery Requests	$395.00 hr	6.50	6.50	$2,567.50
12/21/2015	Lithium Ion Batteries	Batteries	Final revisions to IPP Production Index & Memo; save to file; communicate with LW re same	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	6.00	6.00	$2,370.00
Total Labor For Yunah Rha						**697.70**	**697.70**	**275591.50**
Grand Total						**856.35**	**856.35**	**$ 345,384.75**

Block & Leviton LLP - User Time and Lodestar Summary

Date Start: 1/1/2016 | Date End: 12/31/2016 | Clients: Lithium Ion Batteries | Projects: Batteries | Users: | Account Managers: All

Date	Client	Project	Description	Activity	Rate/ Unit Price	Labor Time/ Quantity	Billable Time/ Cost Price	Bill Amt/ Sell Price
Britt Cibulka								
03/15/2016	Lithium Ion Batteries	Batteries	Review discovery requests and engage in setting up document review platform.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$350.00 hr	2.50	2.50	$875.00
03/16/2016	Lithium Ion Batteries	Batteries	Review discovery requests, assist in client production and upload of documents to review platform.	(7) Document Review	$350.00 hr	5.40	5.40	$1,890.00
03/18/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	$350.00 hr	1.50	1.50	$525.00
03/21/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	$350.00 hr	3.20	3.20	$1,120.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	$350.00 hr	3.90	3.90	$1,365.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and confer with L. Weaver regarding review protocol and production issues.	(7) Document Review	$350.00 hr	1.50	1.50	$525.00
03/23/2016	Lithium Ion Batteries	Batteries	Prepare production set for documents produced by the City of Palo Alto.	(7) Document Review	$350.00 hr	1.40	1.40	$490.00
03/24/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	$350.00 hr	1.70	1.70	$595.00
03/25/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for the purposes of production.	(7) Document Review	$350.00 hr	1.00	1.00	$350.00
03/29/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto for production.	(7) Document Review	$350.00 hr	2.20	2.20	$770.00
03/29/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and confer with L. Weaver regarding review protocol and production issues.	(7) Document Review	$350.00 hr	0.50	0.50	$175.00
03/30/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	2.50	2.50	$875.00
03/30/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	0.90	0.90	$315.00
03/31/2016	Lithium Ion Batteries	Batteries	Review documents from the City of Palo Alto for production.	(7) Document Review	$350.00 hr	2.20	2.20	$770.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	2.00	2.00	$700.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	1.50	1.50	$525.00
04/01/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	1.40	1.40	$490.00
04/04/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	1.50	1.50	$525.00
04/04/2016	Lithium Ion Batteries	Batteries	Review documents produced by the City of Palo Alto and prepare documents for production.	(7) Document Review	$350.00 hr	0.70	0.70	$245.00
04/06/2016	Lithium Ion Batteries	Batteries	Prepare supplemental production for the City of Palo Alto.	(7) Document Review	$350.00 hr	0.80	0.80	$280.00
04/08/2016	Lithium Ion Batteries	Batteries	Prepare supplemental production for the City of Palo Alto.	(7) Document Review	$350.00 hr	0.20	0.20	$70.00
				Total Labor For Britt Cibulka		**38.50**	**38.50**	**$ 13,475.00**
Julie Ledwig								
01/29/2016	Lithium Ion Batteries	Batteries	Update pleadings index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
03/02/2016	Lithium Ion Batteries	Batteries	Reformat Objections/Responses to Subpoena and input signature block.	(3) Drafting Discovery Answers/Responses	$225.00 hr	0.35	0.35	$78.75
03/04/2016	Lithium Ion Batteries	Batteries	Finalize Palo Alto Subpoena Objections; draft Richmond Subpoena Objections; emails to/from L. Weaver regarding same.	(3) Drafting Discovery Answers/Responses	$225.00 hr	0.90	0.90	$202.50
03/21/2016	Lithium Ion Batteries	Batteries	Emails from/to S. Cikes and L. Weaver regarding Richmond production documents.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
03/22/2016	Lithium Ion Batteries	Batteries	Emails from/to L. Weaver in preparation for upcoming productions	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	1.00	1.00	$225.00
03/22/2016	Lithium Ion Batteries	Batteries	Prepare Richmond production documents and cover letter; circulate production to opposing and co-counsel	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.90	0.90	$202.50
03/22/2016	Lithium Ion Batteries	Batteries	Create Richmond production tracking index; update production e-mail circulation list for Richmond productions.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.25	0.25	$56.25
03/24/2016	Lithium Ion Batteries	Batteries	Download/save productions to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.30	0.30	$67.50
03/29/2016	Lithium Ion Batteries	Batteries	Compare original Palo Alto objections to Samsung Amended Depo Notice for changes and email to L. Weaver regarding same.	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$225.00 hr	0.30	0.30	$67.50
03/31/2016	Lithium Ion Batteries	Batteries	Download Palo Alto production and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.30	0.30	$67.50
04/01/2016	Lithium Ion Batteries	Batteries	Finalize and circulate Palo Alto's Responses and Objections to Defendants' Amended Notice of Deposition; emails to/from L. Weaver regarding same.	(3) Drafting Discovery Answers/Responses	$225.00 hr	0.20	0.20	$45.00
04/05/2016	Lithium Ion Batteries	Batteries	Download productions to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.30	0.30	$67.50
04/11/2016	Lithium Ion Batteries	Batteries	Download production documents to the system and update production tracking index.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.15	0.15	$33.75
04/14/2016	Lithium Ion Batteries	Batteries	Draft shell responses to Defendants' Third Interrogatories and client verification forms; emails to/from L. Weaver, M. Desai regarding same.	(3) Drafting Discovery Answers/Responses	$225.00 hr	1.60	1.60	$360.00
04/15/2016	Lithium Ion Batteries	Batteries	Emails from/to M. Desai regarding written discovery.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.15	0.15	$33.75
05/02/2016	Lithium Ion Batteries	Batteries	Create sample errata forms and email same to L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.40	0.40	$90.00
05/20/2016	Lithium Ion Batteries	Batteries	Download production documents to the system.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.15	0.15	$33.75
05/24/2016	Lithium Ion Batteries	Batteries	Draft Notice of Change of Address for L. Weaver and W. Street.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.15	0.15	$33.75
05/25/2016	Lithium Ion Batteries	Batteries	Download third-party discovery documents to the system.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
06/02/2016	Lithium Ion Batteries	Batteries	Docket search and email communications w. L. Weaver re protective orders.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.20	0.20	$45.00
06/27/2016	Lithium Ion Batteries	Batteries	Finalize and Efile notice of change of address for L. Weaver; coordinate production/delivery of chambers copies of same for District and Magistrate Judges per standing orders	(8) Drafting Pleadings, Briefs & Pretrial Motions	$225.00 hr	0.40	0.40	$90.00
07/19/2016	Lithium Ion Batteries	Batteries	Emails w. M. Desai regarding Horn expert report.	(11) Litigation Strategy, Analysis & Case Management	$225.00 hr	0.15	0.15	$33.75
				Total Labor For Julie Ledwig		**8.75**	**8.75**	**1968.75**
Lesley Weaver								
01/04/2016	Lithium Ion Batteries	Batteries	Prepare for and attend meet and confer with defendants re: discovery responses;	(6) Discovery Meet & Confer	$700.00 hr	1.10	1.10	$770.00
01/04/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with co-leads re: proposed deposition dates for public entities and strategy re: discovery;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	1.30	1.30	$910.00
01/05/2016	Lithium Ion Batteries	Batteries	Confer with counsel for defendants re: deposition notices;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.30	0.30	$210.00
01/06/2016	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re: meet and confer with defendants and setting of deposition dates;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.10	0.10	$70.00
01/07/2016	Lithium Ion Batteries	Batteries	Coordinate re: verifications and deposition scheduling;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.10	0.10	$70.00
01/11/2016	Lithium Ion Batteries	Batteries	Review 30b6 notices and coordinate with co-counsel re: drafting objections and conferring with clients as to dates	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$700.00 hr	0.30	0.30	$210.00
01/11/2016	Lithium Ion Batteries	Batteries	Review 30b6 notices- outline issues to object to and confer with Y. Rha	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$700.00 hr	0.30	0.30	$210.00
01/12/2016	Lithium Ion Batteries	Batteries	Prepare for meet and confer on 30(b)(6) notices; reschedule meet and confer;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
01/13/2016	Lithium Ion Batteries	Batteries	Prepare for meet and confer with defendants re deposition notice;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.30	0.30	$210.00
01/14/2016	Lithium Ion Batteries	Batteries	Confer with Richmond re: depositions; coordinate with S. Cikes re dep dates;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
01/20/2016	Lithium Ion Batteries	Batteries	Coordinate deposition dates with clients;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.30	0.30	$210.00
02/07/2016	Lithium Ion Batteries	Batteries	Review and analyze ethics opinion issued by the CA AG re retention of outside counsel;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$700.00 hr	1.20	1.20	$840.00
02/08/2016	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re deposition prep and scheduling;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.20	0.20	$140.00
02/09/2016	Lithium Ion Batteries	Batteries	Review 30(b)(6) deposition notice to prepare objections; confer with co-counsel re: same;	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$700.00 hr	0.40	0.40	$280.00

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02/09/2016	Lithium Ion Batteries	Batteries	Coordinate re plaintiff depositions;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.20	0.20	$140.00
02/24/2016	Lithium Ion Batteries	Batteries	Coordinate re deposition scheduling of Sue Hartman for Richmond;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
03/01/2016	Lithium Ion Batteries	Batteries	Coordinate deposition prep with clients after confirming dep dates;	(5) Deposition Defending	$700.00 hr	0.70	0.70	$490.00
03/02/2016	Lithium Ion Batteries	Batteries	Revise objections to deposition notice; circulate same;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.30	0.30	$210.00
03/03/2016	Lithium Ion Batteries	Batteries	Prepare for dep prep with Palo Alto and Richmond;	(5) Deposition Defending	$700.00 hr	1.10	1.10	$770.00
03/03/2016	Lithium Ion Batteries	Batteries	Prepare outline and documents for client prep session; coordinate re prep session with client and co-counsel;	(5) Deposition Defending	$700.00 hr	3.60	3.60	$2,520.00
03/04/2016	Lithium Ion Batteries	Batteries	Review document production summary ahead of call to prepare clients for deposition; analyze draft deposition prep outline re: same	(5) Deposition Defending	$700.00 hr	0.50	0.50	$350.00
03/04/2016	Lithium Ion Batteries	Batteries	Follow up with co-leads re: questions about case development per depositions	(5) Deposition Defending	$700.00 hr	0.40	0.40	$280.00
03/04/2016	Lithium Ion Batteries	Batteries	Prepare with S Cikes for call with rep from City of Richmond to prepare for deposition;	(5) Deposition Defending	$700.00 hr	1.40	1.40	$980.00
03/04/2016	Lithium Ion Batteries	Batteries	Prepare outline and meet with 30b6 deponent for Richmond to prepare for deposition; follow up with co-leads re: questions;	(5) Deposition Defending	$700.00 hr	6.70	6.70	$4,690.00
03/10/2016	Lithium Ion Batteries	Batteries	Revise discovery responses on behalf of public entities; coordinate with S. Cikes re: same; serve discovery;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.70	0.70	$490.00
03/11/2016	Lithium Ion Batteries	Batteries	Confer with D. Lambrinos re: deposition defense of public entities; coordinate re: strategies and areas of defense;	(5) Deposition Defending	$700.00 hr	0.70	0.70	$490.00
03/11/2016	Lithium Ion Batteries	Batteries	Confer with co-lead counsel re: which products contain batteries at issue in litigation;	(5) Deposition Defending	$700.00 hr	0.30	0.30	$210.00
03/11/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: searches for documents and verification of responses to new discovery requests;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.50	0.50	$350.00
03/13/2016	Lithium Ion Batteries	Batteries	Review S. Cikes' notes from 2/5/2014 meeting with Palo Alto;	(5) Deposition Defending	$700.00 hr	0.30	0.30	$210.00
03/13/2016	Lithium Ion Batteries	Batteries	Review document production and prepare outline for witness prep of 30b6 deponent for Palo Alto;	(5) Deposition Defending	$700.00 hr	4.20	4.20	$2,940.00
03/14/2016	Lithium Ion Batteries	Batteries	Prepare for and meet with D. Ramberg in Palo Alto for deposition prep;	(5) Deposition Defending	$700.00 hr	6.90	6.90	$4,830.00
03/15/2016	Lithium Ion Batteries	Batteries	Confer with co-counsel S. Cikes re: Palo Alto document production; confer regarding continuing deposition; follow up with co-leads re: same;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.60	0.60	$420.00
03/15/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: verifications;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.10	0.10	$70.00
03/16/2016	Lithium Ion Batteries	Batteries	Coordinate logistics for document review of Palo Alto documents and efficient production; coordinate with S. Cikes, B. Cibulka, internal team re: plan for production and review;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.80	0.80	$560.00
03/16/2016	Lithium Ion Batteries	Batteries	Review quotes from document vendors for production of Palo Alto documents; coordinate with co-lead counsel re: same;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate with co-lead re: correspondence with Shepherd Mullin re: metadata and document production issues;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate upload of data with client Palo Alto and Everlaw for document review and production;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	1.30	1.30	$910.00
03/17/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	$700.00 hr	4.50	4.50	$3,150.00
03/17/2016	Lithium Ion Batteries	Batteries	Coordinate with B. Cibulka and Everlaw re: uploading data and production of Palo Alto documents with metadata;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.70	0.70	$490.00
03/19/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	$700.00 hr	6.80	6.80	$4,760.00
03/20/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for relevance and privilege;	(7) Document Review	$700.00 hr	5.60	5.60	$3,920.00
03/21/2016	Lithium Ion Batteries	Batteries	Prepare for and attend prep sessions with 30b6 deponent for Richmond, S. Hartman, in Richmond;	(5) Deposition Defending	$700.00 hr	7.90	7.90	$5,530.00
03/21/2016	Lithium Ion Batteries	Batteries	Confer with S. Cikes re: Richmond document production and additional documents to produce;	(5) Deposition Defending	$700.00 hr	0.10	0.10	$70.00
03/22/2016	Lithium Ion Batteries	Batteries	Coordinate with Palo Alto/D. Ramberg re: rescheduling deposition; communicate with opposing counsel re: same;	(5) Deposition Defending	$700.00 hr	0.60	0.60	$420.00
03/22/2016	Lithium Ion Batteries	Batteries	Review documents for production on behalf of Palo Alto; coordinate Bates labeling;	(7) Document Review	$700.00 hr	0.40	0.40	$280.00
03/22/2016	Lithium Ion Batteries	Batteries	Coordinate regarding rolling document production on behalf of Palo Alto; further review of documents; follow up with D. Ramberg re: questions re: documents;	(5) Deposition Defending	$700.00 hr	1.60	1.60	$1,120.00
03/23/2016	Lithium Ion Batteries	Batteries	Review palo Alto documents for responsiveness; coordinate re: document production with B. Cibulka;	(5) Deposition Defending	$700.00 hr	3.60	3.60	$2,520.00
03/23/2016	Lithium Ion Batteries	Batteries	Coordinate and produce initial document production;	(5) Deposition Defending	$700.00 hr	1.40	1.40	$980.00
03/24/2016	Lithium Ion Batteries	Batteries	Follow up with co-lead counsel re: case organization and communication;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.50	0.50	$350.00
03/24/2016	Lithium Ion Batteries	Batteries	Prepare for and meet with Richmond deponent S. Hartman to prepare for deposition;	(5) Deposition Defending	$700.00 hr	5.70	5.70	$3,990.00
03/25/2016	Lithium Ion Batteries	Batteries	Revise and send letter to co-leads re: case management issues;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.50	0.50	$350.00
03/25/2016	Lithium Ion Batteries	Batteries	Prepare for and attend 30b6 deposition of Richmond;	(5) Deposition Defending	$700.00 hr	10.40	10.40	$7,280.00
03/26/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for responsiveness and privilege; code same;	(7) Document Review	$700.00 hr	5.40	5.40	$3,780.00
03/26/2016	Lithium Ion Batteries	Batteries	Communicate with co-leads re: corrections to motion for class certification;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
03/27/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for responsiveness and privilege; code same;	(7) Document Review	$700.00 hr	4.80	4.80	$3,360.00
03/28/2016	Lithium Ion Batteries	Batteries	Prepare for and attend call with B. Glackin and S. Williams re: correction to motion for class certification and approach re: same;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.80	0.80	$560.00
03/29/2016	Lithium Ion Batteries	Batteries	Revise outline and prepare for meeting with Palo Alto/D. Ramberg to prepare for 30b6 deposition;	(5) Deposition Defending	$700.00 hr	4.30	4.30	$3,010.00
03/29/2016	Lithium Ion Batteries	Batteries	Review proposal on addressing correction to class cert mot.; coord. with co-leads re same	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
03/29/2016	Lithium Ion Batteries	Batteries	Prepare for and attend call with T. Howzell re: document search and retention	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.70	0.70	$490.00
03/29/2016	Lithium Ion Batteries	Batteries	Coordinate with co-leads re: proposed correction to motion for class cert	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
04/01/2016	Lithium Ion Batteries	Batteries	Review and analyze motion for preliminary approval of sony settlement; confer with clients re: same; obtain approval and communicate same to co-leads;	(12) Negotiating Settlements	$700.00 hr	0.60	0.60	$420.00
04/01/2016	Lithium Ion Batteries	Batteries	Prepare for and attend prep session with D. Ramberg for palo alto 30b6;	(5) Deposition Defending	$700.00 hr	5.40	5.40	$3,780.00
04/01/2016	Lithium Ion Batteries	Batteries	Follow up on 3rd document production;	(5) Deposition Defending	$700.00 hr	0.60	0.60	$420.00
04/01/2016	Lithium Ion Batteries	Batteries	Review and revise objections to dep notice; coordinate service re: same;	(5) Deposition Defending	$700.00 hr	0.20	0.20	$140.00
04/02/2016	Lithium Ion Batteries	Batteries	Finalize document productionon behalf of Palo Alto; circulate production to all counsel;	(5) Deposition Defending	$700.00 hr	1.60	1.60	$1,120.00
04/02/2016	Lithium Ion Batteries	Batteries	Review and analyze Palo Alto documents for responsiveness and privilege; finalize document set for production;	(5) Deposition Defending	$700.00 hr	4.70	4.70	$3,290.00
04/03/2016	Lithium Ion Batteries	Batteries	Review Palo Alto documents for production;	(5) Deposition Defending	$700.00 hr	3.10	3.10	$2,170.00
04/04/2016	Lithium Ion Batteries	Batteries	Review and analyze supplemental Palo Alto production; prepare for production; coordinate with B. Cibulka and B. Liu re: same;	(5) Deposition Defending	$700.00 hr	3.70	3.70	$2,590.00
04/04/2016	Lithium Ion Batteries	Batteries	Prep MD re: case status in preparation for defense of Palo Alto deposition;	(5) Deposition Defending	$700.00 hr	0.60	0.60	$420.00
04/04/2016	Lithium Ion Batteries	Batteries	Review document production on behalf of Palo Alto; circulate production to opposing counsel	(5) Deposition Defending	$700.00 hr	0.50	0.50	$350.00
04/05/2016	Lithium Ion Batteries	Batteries	Meet with M. Desai and update on case to prepare for defense of Palo Alto deposition;	(5) Deposition Defending	$700.00 hr	0.60	0.60	$420.00
04/05/2016	Lithium Ion Batteries	Batteries	Review and analyze defendants' third set of document requests; confer with D. Lambrinos re: same; circulate to clients and coordinate with co-counsel re: obtaining responses	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.70	0.70	$490.00
04/05/2016	Lithium Ion Batteries	Batteries	Coordinate with lead counsel re: filing of erratum on class cert motion;	(8) Drafting Pleadings, Briefs & Pretrial Motions	$700.00 hr	0.30	0.30	$210.00
04/07/2016	Lithium Ion Batteries	Batteries	Confer with clients and with lead counsel re: defendants' request for identification of every product in municipalities' possession that contains a lithium ion battery	(10) Class Certification/Experts	$700.00 hr	0.60	0.60	$420.00

04/10/2016	Lithium Ion Batteries	Batteries	Review documents for final Palo Alto doc production; verify same and attention logistics of production;	(10) Class Certification/Experts	$700.00 hr	1.30	1.30	$910.00
04/12/2016	Lithium Ion Batteries	Batteries	Coordinate with opposing counsel re: meet and confer re: new set of discovery requests;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.10	0.10	$70.00
04/15/2016	Lithium Ion Batteries	Batteries	Coordinate with opposing counsel re: need to continue Palo Alto deposition;	(5) Deposition Defending	$700.00 hr	0.20	0.20	$140.00
04/18/2016	Lithium Ion Batteries	Batteries	Coordinate with S. Cikes re: dep prep with D. Ramberg and rescheduling of dep; deal with conflict issue and rescheduling;	(5) Deposition Defending	$700.00 hr	0.90	0.90	$630.00
04/21/2016	Lithium Ion Batteries	Batteries	Coordinate with D. Lambrinos re: logistics of deposition; discuss latest tactics of defendants re: prepping witnesses;	(5) Deposition Defending	$700.00 hr	0.20	0.20	$140.00
04/21/2016	Lithium Ion Batteries	Batteries	Follow up with Akin Gump re: potential conflict issue and obtaining waiver from LG Chem;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.30	0.30	$210.00
04/25/2016	Lithium Ion Batteries	Batteries	Confirm waiver of any conflict from LG Chem for M. Desai;	(5) Deposition Defending	$700.00 hr	0.30	0.30	$210.00
04/25/2016	Lithium Ion Batteries	Batteries	Review interrogatory responses and verifications; coordinate with clients re: same to confirm accuracy and verifications; coordinate service of same;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.80	0.80	$560.00
04/25/2016	Lithium Ion Batteries	Batteries	Meet with M. Desai re: preparation for defense of Palo Alto deposition;	(5) Deposition Defending	$700.00 hr	0.90	0.90	$630.00
04/26/2016	Lithium Ion Batteries	Batteries	Coordinate with co-counsel re: follow up discovery and search for responsive materials; review and revise draft of interrogatory response; review documents forwarded by co-counsel to confirm previous production;	(5) Deposition Defending	$700.00 hr	1.20	1.20	$840.00
04/26/2016	Lithium Ion Batteries	Batteries	Travel to, meet with D. Ramberg to prepare for deposition;	(5) Deposition Defending	$700.00 hr	5.70	5.70	$3,990.00
04/27/2016	Lithium Ion Batteries	Batteries	Prepare for defense of Palo Alto in deposition; attn logistics and last minute preparation/issues;	(5) Deposition Defending	$700.00 hr	2.40	2.40	$1,680.00
04/28/2016	Lithium Ion Batteries	Batteries	Prepare for and defend deposition of Palo Alto;	(5) Deposition Defending	$700.00 hr	12.40	12.40	$8,680.00
04/29/2016	Lithium Ion Batteries	Batteries	Follow up re: discovery issues raised in deposition, including identification of location products containing batteries;	(5) Deposition Defending	$700.00 hr	0.90	0.90	$630.00
04/29/2016	Lithium Ion Batteries	Batteries	Email M. Stump, City Attorney of Palo Alto, re: deposition outcome; follow up with D. ramberg re: same;	(5) Deposition Defending	$700.00 hr	0.50	0.50	$350.00
05/01/2016	Lithium Ion Batteries	Batteries	Confirm call with Palo Alto's IT personnel to identify products containing product;	(10) Class Certification/Experts	$700.00 hr	0.10	0.10	$70.00
05/02/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with Palo Alto re: identification of products containing batteries at issue; confer with M. Desai re: same; develop strategy for response;	(10) Class Certification/Experts	$700.00 hr	1.30	1.30	$910.00
05/02/2016	Lithium Ion Batteries	Batteries	Request additional time from opposing counsel for Richmond to review transcript due to Ms. Hartman's medical procedure;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.10	0.10	$70.00
05/02/2016	Lithium Ion Batteries	Batteries	Follow up with client re: errata in deposition transcript; identifying products containing batteries; and production of documents in electronic form; coordinate with client and M. Desai re: same;	(10) Class Certification/Experts	$700.00 hr	0.80	0.80	$560.00
05/03/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: amending interrogatory responses;	(10) Class Certification/Experts	$700.00 hr	0.40	0.40	$280.00
05/03/2016	Lithium Ion Batteries	Batteries	Consult with expert re: establishing uniformity in purchasing practices of municipalities;	(10) Class Certification/Experts	$700.00 hr	0.80	0.80	$560.00
05/05/2016	Lithium Ion Batteries	Batteries	Confer with inhouse counsel at Richmond re production of documents with metadata;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
05/05/2016	Lithium Ion Batteries	Batteries	Confer with S. Moore re: search for products containing lithium ion batteries; coordinate with co-counsel re: same;	(10) Class Certification/Experts	$700.00 hr	0.40	0.40	$280.00
05/05/2016	Lithium Ion Batteries	Batteries	Follow up with client re: responses to follow on interrogatories;	(3) Drafting Discovery Answers/Responses	$700.00 hr	0.30	0.30	$210.00
05/06/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: search for evidence in response to follow up discovery; coordinate re: same;	(10) Class Certification/Experts	$700.00 hr	0.70	0.70	$490.00
05/06/2016	Lithium Ion Batteries	Batteries	Coordinate with M. Desai re: client site visit on Monday: goals, strategies, etc.;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.60	0.60	$420.00
05/08/2016	Lithium Ion Batteries	Batteries	Follow up re: meeting with Palo Alto on Monday, 5/9, to determine location of products; confer with M. Desai and S. Cikes re: same;	(10) Class Certification/Experts	$700.00 hr	0.40	0.40	$280.00
05/12/2016	Lithium Ion Batteries	Batteries	Follow up with clients re: additional searches;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.20	0.20	$140.00
05/12/2016	Lithium Ion Batteries	Batteries	Follow up with co-counsel re: search for products and producing documents with metadata on behalf of Richmond; coordinate with M. Desai re: same;	(10) Class Certification/Experts	$700.00 hr	0.50	0.50	$350.00
05/17/2016	Lithium Ion Batteries	Batteries	Confer with clients re: supplemental interrogatory responses; review draft dogs and new verifications; coordinate with M. Desai and counsel or clients re: same;	(10) Class Certification/Experts	$700.00 hr	1.60	1.60	$1,120.00
05/19/2016	Lithium Ion Batteries	Batteries	Follow up with T. Howzell at Palo Alto re: additional SAP report;	(10) Class Certification/Experts	$700.00 hr	0.40	0.40	$280.00
05/24/2016	Lithium Ion Batteries	Batteries	Confer with opposing counsel re: confidential designations of transcripts;	(6) Discovery Meet & Confer	$700.00 hr	0.10	0.10	$70.00
06/02/2016	Lithium Ion Batteries	Batteries	Confer with co-leads re: responding to arguments in defendants' opposition to class certification;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.20	0.20	$140.00
06/16/2016	Lithium Ion Batteries	Batteries	Analyze areas to shore up regarding respresentation of government entities as subclass; coordinate with co-leads re: conference call to discuss;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.20	0.20	$140.00
06/16/2016	Lithium Ion Batteries	Batteries	Prepare for and attend conference call with S. Williams re: strategy on reply;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.40	0.40	$280.00
06/21/2016	Lithium Ion Batteries	Batteries	Confer with M. Desai re: drafting insert for class cert reply; research re: purchases of government entities, per conversation with S. Williams;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.50	0.50	$350.00
06/21/2016	Lithium Ion Batteries	Batteries	Follow up with co-leads re: wavier of conflict to Orrick as counsel to third party;	(11) Litigation Strategy, Analysis & Case Management	$700.00 hr	0.30	0.30	$210.00
					Total Labor For Lesley Weaver	**168.70**	**168.70**	**$118,090.00**
Mili Desai								
04/04/2016	Lithium Ion Batteries	Batteries	Discussion of case background and procedural posture with L. Weaver (0.5).	(11) Litigation Strategy, Analysis & Case Management	$575.00 hr	0.50	0.50	$287.50
04/05/2016	Lithium Ion Batteries	Batteries	Call with S. Cikes re document production issues (0.3). Discussion with L. Weaver re same (0.1). Review of background documents and analysis of class certification issues (1.2).	(11) Litigation Strategy, Analysis & Case Management	$575.00 hr	1.60	1.60	$920.00
04/06/2016	Lithium Ion Batteries	Batteries	Review of deposition transcript of Hartman deposition transcript (2.0). Review of motion to certify class (1.0).	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$575.00 hr	3.00	3.00	$1,725.00
04/11/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition through review of prior transcripts, development of outline, and review of filings.	(5) Deposition Defending	$575.00 hr	5.50	5.50	$3,162.50
04/12/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition (0.9).	(5) Deposition Defending	$575.00 hr	0.90	0.90	$517.50
04/13/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition: review of deposition notice and objections; review of class certification motion; discussion with L. Weaver re same.	(1) Investigations, Factual Research	$575.00 hr	2.10	2.10	$1,207.50
04/14/2016	Lithium Ion Batteries	Batteries	Preparation for Palo Alto deposition. Drafting interrogatory responses for Richmond and Palo Alto. Discussion with L. Weaver re interrogatory responses and factual case background.	(5) Deposition Defending	$575.00 hr	8.70	8.70	$5,002.50
04/15/2016	Lithium Ion Batteries	Batteries	Preparation for depo prep session with Palo Alto. Review of Palo Alto purchasing framework, Richmond deposition, pleadings, and document discovery. Call with S. Cikes re deposition topics and areas of preparation. Call with L. Weaver re same.	(5) Deposition Defending	$575.00 hr	7.20	7.20	$4,140.00
04/25/2016	Lithium Ion Batteries	Batteries	Drafting and finalizing interrogatory responses (1.1).	(3) Drafting Discovery Answers/Responses	$575.00 hr	1.10	1.10	$632.50
04/26/2016	Lithium Ion Batteries	Batteries	Amending previously served interrogatories (1.2). Meeting with D. Ramberg in preparation for City of Palo Alto's 30(b)(6) deposition (4.5).	(5) Deposition Defending	$575.00 hr	5.70	5.70	$3,277.50
04/28/2016	Lithium Ion Batteries	Batteries	Defending deposition of David Ramberg/City of Palo Alto (8.4).	(5) Deposition Defending	$575.00 hr	8.40	8.40	$4,830.00
05/03/2016	Lithium Ion Batteries	Batteries	Meeting with L. Weaver regarding next steps in case (1.5). Coordinating return of errata sheet with City of Richmond (0.6). Call with City of Richmond re document productions and discovery next steps (0.6).	(1) Investigations, Factual Research	$575.00 hr	2.70	2.70	$1,552.50
05/04/2016	Lithium Ion Batteries	Batteries	Discussion with L. Weaver re discovery responses and follow up with S. Cikes and clients re same.	(6) Discovery Meet & Confer	$575.00 hr	0.50	0.50	$287.50
05/05/2016	Lithium Ion Batteries	Batteries	Discussion with client re document search procedures and location of laptops.	(6) Discovery Meet & Confer	$575.00 hr	0.80	0.80	$460.00
05/06/2016	Lithium Ion Batteries	Batteries	Call with Palo Alto re identification of laptops.	(6) Discovery Meet & Confer	$575.00 hr	0.80	0.80	$460.00

05/09/2016	Lithium Ion Batteries	Batteries	Meeting with Palo Alto to determine location of laptops and responding to Defendants second set of interrogatories.	(3) Drafting Discovery Answers/Responses	$575.00 hr	6.20	6.20	$3,565.00
05/10/2016	Lithium Ion Batteries	Batteries	Review of Richmond deposition errata.	(3) Drafting Discovery Answers/Responses	$575.00 hr	0.50	0.50	$287.50
05/11/2016	Lithium Ion Batteries	Batteries	Sending Richmond errata sheet to defense counsel. Review of objection to settlement.	(3) Drafting Discovery Answers/Responses	$575.00 hr	1.20	1.20	$690.00
05/15/2016	Lithium Ion Batteries	Batteries	Coordinating upload of Richmond documents for re-production to defendants.	(7) Document Review	$575.00 hr	0.20	0.20	$115.00
05/16/2016	Lithium Ion Batteries	Batteries	Drafting interrogatory answers. Liaising with S. Cikes re document productions. Conversations with client re SAP report. Conversations with client re verification of rog responses.	(3) Drafting Discovery Answers/Responses	$575.00 hr	3.10	3.10	$1,782.50
05/17/2016	Lithium Ion Batteries	Batteries	Review of Richmond documents for production with metadata (4.5). Liaising with client re SAP report (0.7).	(7) Document Review	$575.00 hr	5.20	5.20	$2,990.00
05/18/2016	Lithium Ion Batteries	Batteries	Review of electronic Richmond documents for production with metadata.	(7) Document Review	$575.00 hr	5.10	5.10	$2,932.50
05/19/2016	Lithium Ion Batteries	Batteries	Review of Richmond documents for production with metadata and coordinating production (2.8).	(7) Document Review	$575.00 hr	2.80	2.80	$1,610.00
06/09/2016	Lithium Ion Batteries	Batteries	Review of class cert opposition.	(11) Litigation Strategy, Analysis & Case Management	$575.00 hr	1.30	1.30	$747.50
06/14/2016	Lithium Ion Batteries	Batteries	Research related to class cert reply.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$575.00 hr	4.70	4.70	$2,702.50
06/20/2016	Lithium Ion Batteries	Batteries	Research relating to class cert reply	(5) Deposition Defending	$575.00 hr	2.80	2.80	$1,610.00
06/20/2016	Lithium Ion Batteries	Batteries	Attended deposition of Mitsunori Masunaga	(5) Deposition Defending	$575.00 hr	1.50	1.50	$862.50
06/21/2016	Lithium Ion Batteries	Batteries	Research related to class cert reply. Research on topics for expert research and testimony.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$575.00 hr	5.60	5.60	$3,220.00
06/22/2016	Lithium Ion Batteries	Batteries	Drafting local government reply to class certification opposition.	(8) Drafting Pleadings, Briefs & Pretrial Motions	$575.00 hr	4.50	4.50	$2,587.50
06/23/2016	Lithium Ion Batteries	Batteries	Research on possible areas of expert testimony on class cert reply.	(11) Litigation Strategy, Analysis & Case Management	$575.00 hr	1.70	1.70	$977.50
07/15/2016	Lithium Ion Batteries	Batteries	Email traffic with L. Weaver and D. Lambrinos re Horn deposition.	(10) Class Certification/Experts	$575.00 hr	0.50	0.50	$287.50
07/18/2016	Lithium Ion Batteries	Batteries	Research related to laptop purchases of Richmond and Palo Alto. Development of outline for Horn deposition.	(10) Class Certification/Experts	$575.00 hr	7.80	7.80	$4,485.00
07/19/2016	Lithium Ion Batteries	Batteries	Factual research related to ascertainability issue. Drafting of questions for expert Horn depo. Drafting questions for expert Guerin-Calvert depo. Email traffic with D. Lambrinos and L. Weaver re same.	(1) Investigations, Factual Research	$575.00 hr	6.20	6.20	$3,565.00
07/20/2016	Lithium Ion Batteries	Batteries	Call with D. Lambrinos re expert deposition. Follow up with laptop purchase information for Palo Alto and Richmond.	(1) Investigations, Factual Research	$575.00 hr	2.80	2.80	$1,610.00
07/21/2016	Lithium Ion Batteries	Batteries	Review of Palo Alto and Richmond depositions for testimony relevant to class cert reply. Requesting and distributing deposition exhibits	(10) Class Certification/Experts	$575.00 hr	2.80	2.80	$1,610.00
07/22/2016	Lithium Ion Batteries	Batteries	Call with J. Friedman re class cert expert deps and strategy. Follow up with info regarding municipal entities. Attended deposition of expert Q. Horn.	(10) Class Certification/Experts	$575.00 hr	5.20	5.20	$2,990.00
07/26/2016	Lithium Ion Batteries	Batteries	Email traffic with D. Lambrinos re ascertainability issue.	(10) Class Certification/Experts	$575.00 hr	0.70	0.70	$402.50
07/27/2016	Lithium Ion Batteries	Batteries	Searching for supporting testimony for class cert reply.	(10) Class Certification/Experts	$575.00 hr	0.80	0.80	$460.00
07/28/2016	Lithium Ion Batteries	Batteries	Communications with clients regarding laptop and battery information for class cert reply.	(10) Class Certification/Experts	$575.00 hr	3.50	3.50	$2,012.50
07/29/2016	Lithium Ion Batteries	Batteries	Compiling battery and cell information for class cert reply.	(10) Class Certification/Experts	$575.00 hr	5.50	5.50	$3,162.50
08/01/2016	Lithium Ion Batteries	Batteries	Communications with client and information gathering for class cert reply.	(10) Class Certification/Experts	$575.00 hr	3.80	3.80	$2,185.00
08/04/2016	Lithium Ion Batteries	Batteries	Follow up with J. Friedman re expert dep.	(10) Class Certification/Experts	$575.00 hr	0.20	0.20	$115.00
08/05/2016	Lithium Ion Batteries	Batteries	Attended Guerin-Calvert deposition.	(10) Class Certification/Experts	$575.00 hr	9.10	9.10	$5,232.50
08/10/2016	Lithium Ion Batteries	Batteries	Identifying Richmond and Palo Alto testimony for class cert reply.	(10) Class Certification/Experts	$575.00 hr	2.30	2.30	$1,322.50
08/11/2016	Lithium Ion Batteries	Batteries	Communications with D. Lambrinos regarding information from Richmond and Palo Alto needed for class cert reply. Research related to same.	(10) Class Certification/Experts	$575.00 hr	5.20	5.20	$2,990.00
08/15/2016	Lithium Ion Batteries	Batteries	Follow up with D. Lambrinos re relevant Palo Alto and Richmond testimony.	(10) Class Certification/Experts	$575.00 hr	0.60	0.60	$345.00
08/16/2016	Lithium Ion Batteries	Batteries	Follow up re amended interrogatories.	(10) Class Certification/Experts	$575.00 hr	0.20	0.20	$115.00
08/17/2016	Lithium Ion Batteries	Batteries	Email traffic and TCs with D. Lambrinos and client regarding additional information needed to determine cell types.	(10) Class Certification/Experts	$575.00 hr	2.10	2.10	$1,207.50
08/18/2016	Lithium Ion Batteries	Batteries	Follow up with Richmond regarding laptop information necessary to determine cell type.	(10) Class Certification/Experts	$575.00 hr	1.60	1.60	$920.00
08/19/2016	Lithium Ion Batteries	Batteries	Follow up with client regarding laptop information. Email traffic with D. Lambrinos re same.	(10) Class Certification/Experts	$575.00 hr	2.80	2.80	$1,610.00
					Total Labor For Mili Desai	**159.60**	**159.60**	**$91,770.00**
Whitney Street								
03/21/2016	Lithium Ion Batteries	Batteries	Review/revise letter.	(11) Litigation Strategy, Analysis & Case Management	$675.00 hr	0.20	0.20	$135.00
03/28/2016	Lithium Ion Batteries	Batteries	Discuss case with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	$675.00 hr	0.25	0.25	$168.75
04/25/2016	Lithium Ion Batteries	Batteries	Discuss case with L. Weaver.	(11) Litigation Strategy, Analysis & Case Management	$675.00 hr	0.20	0.20	$135.00
					Total Labor For Whitney Street	**0.65**	**0.65**	**$438.75**
Yunah Rha								
01/11/2016	Lithium Ion Batteries	Batteries	Review Richmond & PA depo notices, ROGs, Req. for Production of Docs	(3) Drafting Discovery Answers/Responses	$395.00 hr	6.50	6.50	$2,567.50
01/12/2016	Lithium Ion Batteries	Batteries	Review depo notices and draft objections to depo notice for PA & Richmond	(5) Deposition Defending	$395.00 hr	7.50	7.50	$2,962.50
01/13/2016	Lithium Ion Batteries	Batteries	Revise and complete objections to depo notice; Attend meet & confer call; draft M&C letter; correspond with LW re same;	(5) Deposition Defending	$395.00 hr	6.50	6.50	$2,567.50
02/11/2016	Lithium Ion Batteries	Batteries	Review batteries document analysis; correspond with LW re same	(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	$395.00 hr	0.20	0.20	$79.00
02/17/2016	Lithium Ion Batteries	Batteries	Manage e-files and organize work product into firm filing system	(11) Litigation Strategy, Analysis & Case Management	$395.00 hr	1.00	1.00	$395.00
					Total Labor For Yunah Rha	**21.70**	**21.70**	**$ 8,571.50**
					Grand Total		**397.90**	**$ 234,314.00**

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
BLOCK & LEVITON LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	$100,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	$51.51
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw/PACER	$32.80
Messenger/Delivery	$110.00
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	$89.02
Travel	$148.40
Miscellaneous	$2,050.38
TOTAL:	$102,482.11

EXHIBIT 10

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF VAN BUNCH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.**

I, Van Bunch, declare:

1. I am a shareholder of the law firm of Bonnett, Fairbourn, Friedman & Balint, P.C. ("BFFB"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Shawn Sellers and as counsel for IPPs throughout the course of this litigation. The background and experience of BFFB and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, BFFB performed work including, *inter alia*, contributing to the formulation of Plaintiffs' litigation strategy and case management, drafting and editing written discovery, and preparing for and defending class representative Shawn Sellers' deposition.

5. A summary of work performed by BFFB and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Van Bunch in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Bonnett, Fairbourn, Friedman & Balint, P.C. and filed on May 26, 2017. (ECF No. 1813-8). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by BFFB since June 1, 2013 was 58.6, with a corresponding lodestar of $25,757.50 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses BFFB has incurred from June 1, 2013 to present. BFFB expended a total of $841.40 in unreimbursed costs and

expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by BFFB on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by BFFB in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Phoenix, Arizona.

/s/ Van Bunch

Van Bunch

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

Exhibit A

BONNETT FAIRBOURN FRIEDMAN & BALINT PC

ABOUT THE FIRM

Bonnett, Fairbourn, Friedman & Balint, P.C. is an AV rated firm of 20 lawyers. Our clients include many individuals and local businesses, as well as major national and international companies in a wide range of civil litigation in both federal and state courts.

The firm has developed a recognized practice in the area of complex commercial litigation, including major class actions and is widely regarded as the preeminent firm in Arizona representing plaintiffs in class action proceedings. Over the last twenty years, the firm has successfully handled more than 100 class action lawsuits. We have represented consumers and victims in a wide range of class action proceedings, including actions alleging antitrust claims, securities fraud, civil rights claims and consumer fraud.

Our antitrust practice includes the prosecution of class claims on behalf of direct purchasers of products as well as indirect purchaser claims. These antitrust cases include, among others, class actions against Microsoft, MasterCard, Apple Computer and sellers of products such as polyester and rubber chemicals, waste management services, financial products and other industries. In addition to our class action practice, the firm also has represented plaintiffs in individual litigation asserting antitrust claims, including Culligan International.

Bonnett, Fairbourn, Friedman & Balint has taken a leading role in numerous important actions on behalf of consumers and investors, and we have been responsible for many outstanding results that have yielded dozens of multi-million dollar recoveries for class members in Arizona and throughout the United States.

Bonnett, Fairbourn, Friedman & Balint, P.C.
2325 E. Camelback Road, Suite 300
Phoenix, Arizona 85016
Phone: (602) 274-1100
Toll Free Number: (800) 847-9094
Facsimile: (602) 274-1199

PRACTICE AREAS

CLASS ACTION

Bonnett, Fairbourn, Friedman & Balint represents consumers and investors in major class action cases in federal and state courts throughout the United States. Under the direction of Andrew S. Friedman, the firm's class action section represents plaintiff classes in the following areas:

Securities Fraud: Protects institutional shareholders and individual investors from corporate fraud and mismanagement.

Consumer Protection: Protects consumers from defective products and fraudulent marketing practices.

Antitrust: Protects individuals and businesses from price fixing, unfair business practices and other anticompetitive conduct.

Civil Rights and Employment: Protects employees and consumers against unfair practices and racial, age, gender, and other forms of discrimination.

Insurance and Health Care: Represents victims of fraud and unfair sales practices by life insurance companies and HMOs.

Tobacco: Seeks redress for fraudulent marketing of "Light" cigarettes as a less toxic version of "Full Flavor" varieties.

False Claims and Whistleblowers: Provides for awards to individuals who uncover false claims for payment submitted to the federal government.

SECURITIES

Bonnett, Fairbourn, Friedman & Balint has extensive experience in plaintiffs' class action securities cases in and out of the State of Arizona. Its attorneys have recovered substantial verdicts and settlements in various high-profile cases representing bondholders who have suffered significant losses due to the criminal activities of individuals in the securities and banking industries, including victimized investors in the Lincoln Savings scandal.

APPELLATE LITIGATION

Bonnett, Fairbourn, Friedman & Balint has extensive appellate experience at all levels of the state and federal court systems. Attorneys from the firm have appeared before the Arizona Court of Appeals, the Arizona Supreme Court, and numerous U.S. Circuit Courts. Decisions to appeal a matter are not made lightly by the firm; we carefully analyze the likelihood of a positive result for the client against the potential cost of an unfavorable outcome. Although we draw on the clerking and practical experience of many of our attorneys in making this analysis, a fully informed client is always an integral part of this process.



VAN BUNCH is a firm shareholder. Mr. Bunch's practice focuses on class action and mass tort litigation. He has represented clients in class litigation involving breach of contract, federal and state securities laws, federal and state RICO actions, deceptive insurance sales practices, environmental pollution and other consumer protection claims.

Recently, Mr. Bunch participated in the successful resolution of *Good, et al. v. West Virginia American Water Company* in the United States District Court for the Southern District of West Virginia. The case arose of a spill of hazardous chemicals into the local water supply of Charleston, W.V., shutting down access to drinking water for some 225,000 residents and thousands of businesses. Mr. Bunch served as lead counsel in the case and worked all phases of the litigation up to the eve of trial, when the parties struck a settlement. Before that, Mr. Bunch steered *In re Mingo County Coal Slurry* litigation to a successful conclusion, a case in which over seven hundred West Virginians received compensation for physical injuries, including wrongful death claims and the establishment of a medical monitoring program to help promote earlier diagnosis and treatment from the health effects of alleged exposure to coal slurry in their water supplies.

Mr. Bunch served as trial counsel in *Smith v. American Family*, a case involving the use of imitation crash parts in repair estimates for consumers in the state of Missouri, which resulted in a unanimous jury verdict of approximately $30 million in March, 2007. The case paid tens of thousands of Missourians full compensation, with interest, for their losses.

Mr. Bunch also served as trial counsel in *Lebrilla v. Farmers Insurance Group* in Santa Ana Superior Court, which settled following a complete bench trial in 2006 resulting in readjustment of auto property damage claims for Farmers' insureds nationwide following settlement.

Mr. Bunch served as trial counsel for the investor class in *In re American Continental Corporation/Lincoln Savings and Loan Securities Litigation*, MDL 834. The recovery achieved for investors, after several years of highly adversarial litigation and a months-long trial, exceeded $250 million.

Mr. Bunch served as Co-Lead counsel in the MDL proceedings of *In re Polaris Aircraft Income Fund*, which resulted in a settlement valued at approximately $110 million.

Mr. Bunch also litigated a series of cases involving the sale of so-called "vanishing premium" life insurance policies, including cases against Prudential Insurance and MetLife, which alone returned over $3 billion to defrauded policyholders. Other cases included actions against New York Life, John Hancock, Equitable of Iowa, American General and others. He litigated *Manners v. American General Life Assurance Company* in the United States District Court for the Middle District of Tennessee, which involved the sale of so-called "industrial" life insurance policies and alleged race discrimination in premium setting. He served as local counsel for the Class in the indirect purchaser anti-trust action against Brand Name Prescription Drug makers in Davidson County (Tennessee) Circuit Court, which returned over $7 million in prescription drug benefits distributed through community health centers throughout Tennessee.

Mr. Bunch served as co-editor of the Class Actions and Derivative Suits Subcommittee of the ABA Section of Litigation newsletter. He actively participates in pro bono work, including Tennessee's

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Mr. Bunch received his Bachelor of Arts Degree from Vanderbilt University in 1979. He received his law degree in 1984 from the George C. Taylor School of Law at the University of Tennessee, where he earned membership in the Order of the Coif. Mr. Bunch was admitted to the Bar in Arizona in 1984, Tennessee in 1996 and West Virginia in 2007; he is admitted to practice before the U.S. District Court for the District of Arizona, U.S. District Court for the Middle District of Tennessee and U.S. District Court for the Southern District of West Virginia.

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BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

ATTORNEYS

WILLIAM G. FAIRBOURN, born Salt Lake City, Utah, April 21, 1947; admitted to bar, 1973, Arizona; Arizona Supreme Court; U.S. District Court, District of Arizona; United States Court of Appeals, Ninth Circuit. Education: University of Utah (B.S., 1970); Arizona State University (J.D., 1973). Member: Maricopa County Bar Association (Member, Board of Directors, 1984-1986); Arizona Association of Defense Counsel (Member, Board of Directors, 1981-1989; President, 1986); American Board of Trial Advocates (President Phoenix Chapter, 1994); Fellow, American College of Trial Lawyers.

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CARRIE A. LALIBERTE, born Juneau, Alaska, December 9, 1989; admitted to Arizona bar, 2015; U.S. District Court, District of Arizona. Education: Washington State University (B.S., *magna cum laude*, 2012); Arizona State University College of Law (J.D., *cum laude*, 2015).

LISA T. HAUSER, born Kansas City, Missouri, March 13, 1956; admitted to bar, 1981, Arizona; Arizona Supreme Court; U.S. District Court, District of Arizona; United States Court of Appeals, Ninth Circuit; U.S. Supreme Court. Education: University of Arizona (B.A., with high distinction, 1978); University of Arizona College of Law (J.D., 1981). Member: Arthritis Foundation of Arizona Leadership Board 2014-2016; University of Arizona Phoenix Alumnae Board of Directors 2004-2006; Foundation for Arizona's Future 2001-2005; University of Arizona Alumni Association National Board of Directors 1995-1998; State Bar of Arizona Appointments Committee 1991-1995. Coach, Sandra Day O'Connor School of Law ABA National Appellate Advocacy Competition Team 2011.

NADA DJORDJEVIC, born Chicago, Illinois, June 25, 1970, admitted to Illinois bar, 2002; U.S. District Court for the Northern District of Illinois, 2002, Trial Bar, 2012; U.S. District Court for the Northern District of Indiana, 2004; United States Court of Federal Claims, 2004. Education: Grinnell College (B.A., Sociology, 1996); University of Illinois College of Law (J.D., *summa cum laude*, 2002), *University of Illinois Law Review*, Member 2000-2001, Symposium Editor, 2001-2002.

ANDREA M. WRIGHT, born Charlotte, North Carolina, February 5, 1990; admitted to Montana bar, 2016, Arizona bar, 2018; District Court, District of Arizona, 2018. Education: University of North Carolina at Chapel Hill (B.A. in English Literature and B.A. in Romance Languages, 2008); University of Virginia (J.D., 2016).

Exhibit B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw/Pacer	$83.90
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$91.60
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	$665.90
Miscellaneous	
TOTAL:	**$841.40**

EXHIBIT 11

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF VAN BUNCH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.**

I, Van Bunch, declare:

1. I am a shareholder of the law firm of Bonnett, Fairbourn, Friedman & Balint, P.C. ("BFFB"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Shawn Sellers and as counsel for IPPs throughout the course of this litigation. The background and experience of BFFB and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, BFFB performed work including, *inter alia*, contributing to the formulation of Plaintiffs' litigation strategy and case management, drafting and editing written discovery, and preparing for and defending class representative Shawn Sellers' deposition.

5. Attached hereto as **Exhibit B** is a billing summary of BFFB's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by BFFB during this period of time was 58.6, with a corresponding lodestar based on current rates of $25,757.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by BFFB.

6. Attached hereto as **Exhibit C** is a list of the various billing rates for each attorney at my firm who has billed time in this case.

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

8. Attached hereto as **Exhibit E** is a summary of the expenses BFFB has incurred during the course of this litigation. BFFB expended a total of $841.40 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by BFFB on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at Phoenix, Arizona.

/s/ Van Bunch

Van Bunch

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BONNETT FAIRBOURN
FRIEDMAN & BALINT PC

ABOUT THE FIRM

Bonnett, Fairbourn, Friedman & Balint, P.C. is an AV rated firm of 22 lawyers. Our clients include many individuals and local businesses, as well as major national and international companies in a wide range of civil litigation in both federal and state courts.

The firm has developed a recognized practice in the area of complex commercial litigation, including major class actions and is widely regarded as the preeminent firm in Arizona representing plaintiffs in class action proceedings. Over the last twenty years, the firm has successfully handled more than 100 class action lawsuits. We have represented consumers and victims in a wide range of class action proceedings, including actions alleging antitrust claims, securities fraud, civil rights claims and consumer fraud.

Our antitrust practice includes the prosecution of class claims on behalf of direct purchasers of products as well as indirect purchaser claims. These antitrust cases include, among others, class actions against Microsoft, MasterCard, Apple Computer and sellers of products such as polyester and rubber chemicals, waste management services, financial products and other industries. In addition to our class action practice, the firm also has represented plaintiffs in individual litigation asserting antitrust claims, including Culligan International.

Bonnett, Fairbourn, Friedman & Balint has taken a leading role in numerous important actions on behalf of consumers and investors, and we have been responsible for many outstanding results that have yielded dozens of multi-million dollar recoveries for class members in Arizona and throughout the United States.

Bonnett, Fairbourn, Friedman & Balint, P.C.
2325 E. Camelback Road, Suite 300
Phoenix, Arizona 85016
Phone: (602) 274-1100
Toll Free Number: (800) 847-9094
Facsimile: (602) 274-1199

PRACTICE AREAS

CLASS ACTION

Bonnett, Fairbourn, Friedman & Balint represents consumers and investors in major class action cases in federal and state courts throughout the United States. Under the direction of Andrew S. Friedman, the firm's class action section represents plaintiff classes in the following areas:

Securities Fraud: Protects institutional shareholders and individual investors from corporate fraud and mismanagement.

Consumer Protection: Protects consumers from defective products and fraudulent marketing practices.

Antitrust: Protects individuals and businesses from price fixing, unfair business practices and other anticompetitive conduct.

Civil Rights and Employment: Protects employees and consumers against unfair practices and racial, age, gender, and other forms of discrimination.

Insurance and Health Care: Represents victims of fraud and unfair sales practices by life insurance companies and HMOs.

Tobacco: Seeks redress for fraudulent marketing of "Light" cigarettes as a less toxic version of "Full Flavor" varieties.

False Claims and Whistleblowers: Provides for awards to individuals who uncover false claims for payment submitted to the federal government.

SECURITIES

Bonnett, Fairbourn, Friedman & Balint has extensive experience in plaintiffs' class action securities cases in and out of the State of Arizona. Its attorneys have recovered substantial verdicts and settlements in various high-profile cases representing bondholders who have suffered significant losses due to the criminal activities of individuals in the securities and banking industries, including victimized investors in the Lincoln Savings scandal.

APPELLATE LITIGATION

Bonnett, Fairbourn, Friedman & Balint has extensive appellate experience at all levels of the state and federal court systems. Attorneys from the firm have appeared before the Arizona Court of Appeals, the Arizona Supreme Court, and numerous U.S. Circuit Courts. Decisions to appeal a matter are not made lightly by the firm; we carefully analyze the likelihood of a positive result for the client against the potential cost of an unfavorable outcome. Although we draw on the clerking and practical experience of many of our attorneys in making this analysis, a fully informed client is always an integral part of this process.



VAN BUNCH is a firm shareholder. Mr. Bunch's practice focuses on class action and mass tort litigation. He has represented clients in class litigation involving breach of contract, federal and state securities laws, federal and state RICO actions, deceptive insurance sales practices, environmental pollution and other consumer protection claims.

Recently, Mr. Bunch participated in the successful resolution of *In re Mingo County Coal Slurry* litigation in which several hundred West Virginia families received compensation for physical injuries, including wrongful death claims and the establishment of a medical monitoring program to help promote earlier diagnosis and treatment from the health effects of alleged exposure to coal slurry in their water supplies.

Mr. Bunch served as trial counsel in *Smith v. American Family*, a case involving the use of imitation crash parts in repair estimates for consumers in the state of Missouri, which resulted in a unanimous jury verdict of approximately $30 million in March, 2007. The case paid tens of thousands of Missourians full compensation, with interest, for their losses.

Mr. Bunch also served as trial counsel in *Lebrilla v. Farmers Insurance Group* in Santa Ana Superior Court, which settled following a complete bench trial in 2006 resulting in readjustment of auto property damage claims for Farmers' insureds nationwide following settlement.

Mr. Bunch served as trial counsel for the investor class in the litigation arising out of the collapse of American Continental Corporation/Lincoln Savings and Loan Securities Litigation, MDL 834. The recovery achieved for investors, after several years of highly adversarial litigation and a months-long trial, exceeded $250 million.

Mr. Bunch served as Co-Lead counsel in the MDL proceedings of *In re Polaris Aircraft Income Fund*, which resulted in a settlement valued at approximately $110 million.

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BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

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JERRY C. BONNETT, born Canton, Illinois, April 3, 1946; admitted to bar, 1973, Arizona; 1977, United States Supreme Court; U.S. Court of Appeals, Seventh, Eighth and Ninth Circuits; U.S. District Court, District of Arizona, and U.S. Tax Court. Education: University of Illinois (B.S., with highest honors, 1969; LL.M., 1974); Arizona State University (J.D., *magna cum laude*, 1973). Articles Editor, *Arizona State Law Journal*, 1972-1973. Judge Pro Tem, Arizona Court of Appeals, Division One, 1986 and 1992. Member, American Law Institute.

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TONNA K. FARRAR, born Sedalia, Missouri, April 9, 1972; admitted to Missouri bar, 1997; Kansas bar, 1998, California bar, 2005; U.S. District Court, Eastern and Western Districts of Missouri; U.S. District Court, District of Kansas; U.S. District Court, Central, Eastern, Northern and Southern Districts of California. Education: University of Missouri, Columbia (B.A. 1994); University of Missouri, Kansas City School of Law (J.D. 1997).

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ERIC D. ZARD, born Brainerd, Minnesota, April 4, 1984; admitted to Arizona bar, 2009; U.S. District Court, District of Arizona. Education: University of Minnesota (B.S., 2006); University of Saint Thomas, Minneapolis (J.D., 2009).

KENDALL K. WILSON, born Tacoma, Washington, August 7, 1981; admitted to Arizona bar, 2009; U.S. District Court, District of Arizona. Education: Brigham Young University (B.S., 2006); Arizona State University College of Law (J.D., *summa cum laude*, 2009).

CARRIE A. LALIBERTE, born Juneau, Alaska, December 9, 1989; admitted to Arizona bar, 2015; U.S. District Court, District of Arizona. Education: Washington State University (B.S., *magna cum laude,* 2012); Arizona State University College of Law (J.D., *cum laude*, 2015).

EXHIBIT B

EXHIBIT B

In re: Lithium Ion Batteries Antitrust Litigation

REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Firm Name: Bonnett, Fairbourn, Friedman & Balint, P.C. **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Van Bunch (P)								1.00			2.10				3.10	$700.00	$2,170.00
Manfred P. Muecke (A)	0.30		15.70		32.80						6.70				55.50	$425.00	$23,587.50
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.30**	**0.00**	**15.70**	**0.00**	**32.80**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**8.80**	**0.00**	**0.00**	**0.00**	**58.60**		**$25,757.50**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.30**	**0.00**	**15.70**	**0.00**	**32.80**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**8.80**	**0.00**	**0.00**	**0.00**	**58.60**		**$25,757.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Van Bunch	1/1/15 to 2/28/17	$700.00
Van Bunch	6/1/13 to 12/31/14	$625.00
Manfred P. Muecke	1/1/15 to 2/28/17	$425.00
Mandred P. Muecke	6/1/13 to 12/31/14	$375.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
ATTORNEYS AT LAW

2325 East Camelback Road, Suite 300
Phoenix, AZ 85016-3422
602-274-1100
FEDERAL TAX ID: 86-0510994

5/19/2017

Re: Lithium Ion Batteries Litigation (C/M No. 16087-0001)

For Services Rendered from June 1, 2013 through February 28, 2017 (Historical Rates)

Fee Recap

	Hours	Rate	Amount
Van Bunch	3.1	$625.00	$1,937.50
Manfred P. Muecke	49.7	$425.00	$21,122.50
Manfred P. Muecke	5.8	$375.00	$2,175.00
Totals	**58.6**		**$25,235.00**

Atty	Date	Task Codes	Description	Hours	Rate	Amount
HSB	6/20/2013	11	Confer with co-counsel regarding retention issues	0.2	$625.00	$125.00
HSB	6/21/2013	11	Confer with co-counsel regarding case status and strategy	0.2	$625.00	$125.00
HSB	6/24/2013	11	Confer with co-counsel regarding case status and strategy	0.2	$625.00	$125.00
HSB	6/27/2013	11	Confer with co-counsel regarding retention and prosecution issues	0.2	$625.00	$125.00
MPM	6/27/2013	11	Correspondence (0.5) and telephone conversation (0.5) [redacted]	1.0	$375.00	$375.00
HSB	6/28/2013	11	Confer with co-counsel regarding retention and investigation issues	0.5	$625.00	$312.50
MPM	6/28/2013	11	[redacted]	0.5	$375.00	$187.50
MPM	6/28/2013	11	Correspondence (0.2) [redacted] (0.3) [redacted]	0.5	$375.00	$187.50
HSB	6/28/2013	11	Supplemental conference with co-counsel regarding retention and investigation issues	0.2	$625.00	$125.00
MPM	6/29/2013	1	Correspondence with [redacted] re confirmation of class products	0.3	$375.00	$112.50
MPM	6/29/2013	11	Evaluate and execute class representative agreement and confidentiality agreement	0.5	$375.00	$187.50
HSB	7/2/2013	8	Review correspondence from co-counsel attaching complaint and regarding client documentation	0.2	$625.00	$125.00
HSB	7/2/2013	8	Review complaint and client documentation	0.8	$625.00	$500.00
HSB	10/21/2013	11	Confer with co-counsel regarding case status and strategy	0.3	$625.00	$187.50
MPM	10/21/2013	11	Evaluate and analyze filed amended complaint with firm client named as class representative	1.2	$375.00	$450.00
MPM	10/22/2013	11	Evaluate and analyze draft NOA for filing	0.1	$375.00	$37.50
MPM	9/22/2014	11	Review and evaluate draft class rep declaration re discovery retention	0.2	$375.00	$75.00
MPM	9/22/2014	11	Email draft declaration [redacted]	0.1	$375.00	$37.50
MPM	9/29/2014	11	[redacted]	0.6	$375.00	$225.00
MPM	9/29/2014	11	[redacted]	0.1	$375.00	$37.50
MPM	9/30/2014	11	Text and email correspondence with [redacted]	0.2	$375.00	$75.00
MPM	9/30/2014	11	[redacted]	0.4	$375.00	$150.00
MPM	9/30/2014	11	Email [redacted] to Christopher Le	0.1	$375.00	$37.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
HSB	10/1/2014	11	Confer with cocounsel regarding plaintiff reporting issues	0.1	$625.00	$62.50
HSB	10/3/2014	11	Confer with cocounsel regarding status of plaintiff reporting issues	0.2	$625.00	$125.00
MPM	4/28/2015	3	Prepare email correspondence to [redacted] summarizing type of discovery requests anticipated to be discussed during call	0.2	$425.00	$85.00
MPM	4/28/2015	3	Evaluate interrogatories and requests for production applicable to [redacted]	0.5	$425.00	$212.50
MPM	4/29/2015	3	Exchange email with co-lead counsel regarding [redacted] discovery responses and outstanding documents	0.2	$425.00	$85.00
MPM	4/29/2015	3	Telephone conference with [redacted] and co-counsel regarding anticipated discovery responses and verifying documents to be produced	0.5	$425.00	$212.50
MPM	4/29/2015	3	[redacted]	1.3	$425.00	$552.50
MPM	4/30/2015	3	Prepare email to David Young and Carla Voigt [redacted]	0.2	$425.00	$85.00
MPM	4/30/2015	3	Evaluate submitted pictures and product info in response to discovery requests	3.4	$425.00	$1,445.00
MPM	5/6/2015	3	Exchange email with Carla Voight regarding additional discovery questions concerning items [redacted]	0.2	$425.00	$85.00
MPM	5/6/2015	3	Evaluate [redacted] discovery materials and submissions to determine whether responsive to additional discovery questions	2.6	$425.00	$1,105.00
MPM	5/7/2015	3	[redacted]	0.3	$425.00	$127.50
MPM	5/8/2015	3	Exchange email with Carla Voigt regarding discovery follow up questions concerning class representative Sellers	0.2	$425.00	$85.00
MPM	5/11/2015	3	[redacted]	0.2	$425.00	$85.00
MPM	5/11/2015	3	Exchange email with Carla Voigt regarding draft Sellers interrogatory responses	0.3	$425.00	$127.50
MPM	5/11/2015	3	[redacted]	1.5	$425.00	$637.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	5/13/2015	3	Exchange email with [redacted] and Carla Voight regarding signed discovery verification by [redacted]	0.2	$425.00	$85.00
MPM	5/22/2015	3	[redacted]	0.1	$425.00	$42.50
MPM	5/22/2015	3	Evaluate finalized [redacted] discovery responses to ensure accuracy with documents	1.1	$425.00	$467.50
MPM	9/15/2015	3	Correspondence with [redacted] and Carla Voigt re scheduling of teleconference to conduct targeted email searches per discovery requests	0.3	$425.00	$127.50
MPM	9/17/2015	3	Exchange email with [redacted] and co-counsel confirming day and time to conduct email searches for Toshiba and AT&T	0.2	$425.00	$85.00
MPM	9/18/2015	3	Participate in teleconference with co-counsel and [redacted] re email search concerning Toshiba and AT&T	0.3	$425.00	$127.50
MPM	11/5/2015	3	Prepare email to class representative [redacted] re request to review responses to defendant interrogatories and execute verification form	0.2	$425.00	$85.00
MPM	11/11/2015	3	Exchange email with [redacted] and Carla Voigt re request for verification of response to second set of interrogatories	0.4	$425.00	$170.00
MPM	12/15/2015	5	Exchange email with co-counsel re availability of [redacted] for deposition in late January 2016	0.2	$425.00	$85.00
MPM	12/17/2015	5	[redacted]	0.3	$425.00	$127.50
MPM	12/30/2015	5	Exchange email with Kathryn Hoek re proposed deposition dates for [redacted]	0.3	$425.00	$127.50
MPM	1/12/2016	5	Exchange email with Kathy Hoek and [redacted] re scheduling of deposition for first week of February	0.3	$425.00	$127.50
MPM	1/17/2016	5	Review deposition notice for [redacted] and related email to co-counsel clarifying start time	0.2	$425.00	$85.00
MPM	1/18/2016	5	Initial review of third amended complaint, discovery letters, and discovery submitted by Kathyrn Hoek on January 13th in advance of initial deposition preparation meeting	2.4	$425.00	$1,020.00
MPM	1/20/2016	5	Exchange email with [redacted] and Trish Aquilino re scheduling of initial deposition preparation call and confirming deposition date	0.4	$425.00	$170.00
MPM	1/21/2016	5	Evaluate deposition prep outline, discovery responses, and documents in preparation for deposition of [redacted]	2.5	$425.00	$1,062.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	1/22/2016	5	Continued evaluation of deposition prep outline, discovery responses, and documents in preparation for deposition of [redacted]	2.5	$425.00	$1,062.50
MPM	1/25/2016	5	Continued evaluation of deposition prep outline, discovery responses, and documents in preparation for deposition of [redacted]	3.2	$425.00	$1,360.00
MPM	1/25/2016	5	Participate in teleconference with [redacted] and Lindsey Eccles re initial preparation for deposition	0.6	$425.00	$255.00
MPM	2/2/2016	5	[redacted]	1.3	$425.00	$552.50
MPM	2/2/2016	5	Travel from San Diego to Phoenix to attend deposition of [redacted] including preparation for same during travel	2.5	$425.00	$1,062.50
MPM	2/2/2016	5	[redacted]	2.1	$425.00	$892.50
MPM	2/2/2016	5	[redacted] meeting with [redacted] to discuss deposition topics and overview of case in preparation for deposition	1.2	$425.00	$510.00
MPM	2/3/2016	5	Meet with class representative [redacted] prior to deposition to review anticipated topics and lines of questioning	1.2	$425.00	$510.00
MPM	2/3/2016	5	Attend and participate in deposition of class representative [redacted]	5.8	$425.00	$2,465.00
MPM	2/3/2016	5	Post deposition meeting with class representative [redacted] to review completed deposition and next steps	1.3	$425.00	$552.50
MPM	2/3/2016	5	Return travel from Phoenix following deposition of [redacted] in San Diego	2.2	$425.00	$935.00
MPM	2/10/2016	11	Review proposed complaint and third amended complaint re type of lithium battery at issue to determine whether client still has standing with his products	1.2	$425.00	$510.00
MPM	3/1/2016	3	Exchange email with Lindsey Eccles and [redacted] regarding confirmation of discovery issues regarding whether any comparison of batteries made	0.2	$425.00	$85.00
MPM	3/1/2016	5	Evaluate deposition transcript of [redacted]	2.0	$425.00	$850.00
MPM	3/1/2016	5	Exchange email with Lindsey Eccles (0.1) and [redacted] (0.2) regarding deposition transcript	0.3	$425.00	$127.50

Atty	Date	Task Codes	Description	Hours	Rate	Amount
MPM	3/9/2016	3	Exchange email with Krysta Pachman to confirm [redacted]	0.3	$425.00	$127.50
MPM	3/14/2016	3	Evaluate and review draft discovery responses and verification	0.6	$425.00	$255.00
MPM	3/14/2016	3	Email draft discovery responses and verification to class representative	0.2	$425.00	$85.00
			Total Fees:	**58.6**		**$25,235.00**

Task Codes:
(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation

BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw/Pacer	$83.90
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$91.60
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	$665.90
Miscellaneous	
TOTAL:	**$841.40**

EXHIBIT 12

Daniel E. Birkhaeuser (SBN 136646)
BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER LLP
2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598
Telephone: (925) 945-0200
Facsimile: (925) 945-8792
dbirkhaeuser@bramsonplutzik.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DANIEL E. BIRKHAEUSER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER**

I, Daniel E. Birkhaeuser , declare:

1. I am a partner of Bramson, Plutzik, Mahler & Birkhaeuser, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Tom Pham and Theodore Wolfendale and as counsel for IPPs throughout the course of this litigation. The background and experience of Bramson, Plutzik, Mahler & Birkhaeuser and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Bramson, Plutzik, Mahler & Birkhaeuser has assisted its clients in responding to discovery served by defendants in this action.

5. Attached hereto as **Exhibit B** is a billing summary of Bramson, Plutzik, Mahler & Birkhaeuser's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Bramson, Plutzik, Mahler & Birkhaeuser during this period of time was 4.5, with a corresponding lodestar based on current rates of $3,577.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Bramson, Plutzik, Mahler & Birkhaeuser.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Bramson, Plutzik, Mahler & Birkhaeuser has incurred during the course of this litigation. Bramson, Plutzik, Mahler & Birkhaeuser expended a total of $350.00 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Bramson, Plutzik, Mahler & Birkhaeuser on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Bramson, Plutzik, Mahler & Birkhaeuser in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Walnut Creek, California.

/s/ Daniel E. Birkhaeuser

Daniel E. Birkhaeuser

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP

Bramson Plutzik, Mahler & Birkhaeuser, LLP is a San Francisco Bay Area law firm that specializes in representing plaintiffs in class actions, derivative suits and other complex litigation nationwide.

Members of the firm serving as lead or co-lead counsel have successfully handled class actions in which hundreds of millions of dollars have been recovered for the class members. Among these cases are: *In re Unocal Toxic Spill Litigation,* in which $80 million was recovered for victims of a release of toxic chemicals; *Clark v. Ford Motor Credit Co.*, in which the plaintiff class recovered $58.25 million; *Klussman v. Cross Country Bank*, in which the class achieved a $21 million recovery; *Nguyen v. Verizon Wireless,* which also produced a $21 million recovery; *Patrick v. Blue Shield of California*, in which $20 million was recovered for the class; *Gross v. Barnett Bank,* in which over $19 million was recovered; *Ganal v. Toyota Motor Credit,* in which an $18 million recovery was achieved; *Henderson v. First Interstate Bank of California*, in which $16.25 million was recovered for the plaintiff class; *Guyette v. Viacom, Inc.*, in which a settlement was negotiated that included a cash payment to the class of $13 million; *Reed v. Bank of America,* in which $9 million was recovered; *In re Worlds of Wonder Securities Litigation*, a securities fraud action which resulted in a $9 million recovery; *Whitehouse v. Westcorp Financial Services, Inc.*, in which an $8 million settlement was achieved. The firm's partners have represented clients in class action and derivative cases in federal and state courts throughout the United States.

In addition to its expertise in class actions and derivative litigation, the firm has also achieved prominence in the areas of telecommunications law and First Amendment litigation. The firm's efforts in these areas have resulted in significant published decisions, including two favorable rulings from the United States Supreme Court -- *Community Communications v. City of Boulder*, 455 U.S. 40 (1982), and *City of Los Angeles v. Preferred Communications*, 476 U.S. 488 (1986). *See also Preferred Communications v. City of Los Angeles*, 13 F.3d 1327 (9th Cir.), *cert. denied*, 114 S.Ct. 2738 (1994).

Robert M. Bramson

Robert M. Bramson has thirty-six years of experience in the litigation of antitrust and consumer cases, class actions and other complex litigation. Mr. Bramson received his undergraduate degree in economics, summa cum laude, from the University of California at Berkeley in 1977, and obtained his law degree from the Boalt Hall School of Law in 1981.

Mr. Bramson has represented both plaintiffs and defendants in numerous antitrust cases, and has acted as lead counsel in two such actions taken to trial – *Pacific West Cable Co. v. City of Sacramento*, et al. (E.D. Cal.) ($12 Million settlement on 24th day of trial, at close of plaintiff's case; Sherman Act §2 monopolization claims) and *Coleman et al. v. Sacramento Cable Television* (Sacramento Sup. Ct.) ($2.4 Million judgment after 17-day trial; class action/B & P §17200 case; B & P §17024 discriminatory pricing claims).

Mr. Bramson specializes in antitrust, consumer protection, business torts and communications litigation, as well as in class action cases. He served for many years on the Board of Directors of the National Association of Consumer Advocates and co-chaired its class action committee. He is a contributing author to the National Consumer Law Center's publication Consumer Class Actions. He acted as reporter for the National Association of Consumer Advocates in preparing its influential Standards and Guidelines For Consumer Class Actions, 176 F.R.D. 375 (1997).

Mr. Bramson's lecture topics have included "Strategic and Ethical Issues in Litigating 17200 Cases" (Bar Association of San Francisco, San Francisco 2001), "Equitable Remedies In Class Actions and Under California's Section 17200 Statute" (National Association of Consumer Advocates, Chicago 2000), "Ethical Issues Arising in Class Action Settlements" (National Consumer Law Center, Wash. DC and San Diego 1999 and 1998) "California's Business & Professions Code Section 17200" (California Bar Association, Lake Tahoe 1997), "Preparation of Competitive Business Practices Cases" (Continuing Education of the Bar, Sacramento 1997), and "The Cable Communications Policy Act of 1984" (California State University, Fullerton 1993).

Robert M. Bramson Representative Cases

Klussman v. Cross Country Bank (Alameda County Superior Court) Honorable Ronald Sabraw and Honorable Lawrence Appel, presiding. Co-counsel for a consumer class against credit card issuer. Shortly before trial was due to commence, a settlement was negotiated that resulted in the recovery of consideration exceeding $21 million.

Boltz v. Buena Vista Home Entertainment, et al. (Los Angeles Superior Court) Honorable Anthony Mohr, presiding. Co-counsel on behalf of a nationwide class of hard of hearing persons seeking "close captioning" of content on the DVDs distributed to the public by four major motion picture studios. Case was settled by stipulations to industry-changing injunctions requiring greater captioning.

Acree v. General Motors Acceptance Corp. (Sacramento Superior Court; Third District Court of Appeal) Honorable James Long, presiding. Class action challenging insurance charges imposed upon borrowers by defendant. Following extended trial and multiple appeals, judgment for class and award of fees against defendant totaling approximately $7,000,000 upheld on appeal.

In re Unocal Refinery Litigation (Contra Costa Superior Court) Honorable Ignacio Ruvulo, presiding. One of two co-lead counsel for a class of victims exposed to a toxic chemical spill. Following extensive discovery, including several months of daily depositions, an $80,000,000 settlement was negotiated.

Pacific West Cable Company v. City of Sacramento, et al. (U.S. District Court, E.D. Cal.) Honorable Milton L. Schwarz, presiding. Antitrust jury trial on behalf of plaintiff. Case settled for $12,000,000 after month-long presentation of plaintiff's case in chief.

Coleman v. Sacramento Cable Television (Sacramento Superior Court) Honorable Roger K. Warren, presiding. Judgment of $2,400,000 obtained for clients in Bus. & Prof. Code §17200 "quasi-class" case, following 26 day trial.

Campisi v. Chavez, et al. (Arbitration) Charles E. Farnsworth, Esq., Referee, presiding. Defended clients against claims of breach of contract and breach of fiduciary duty. Three week arbitration proceeding resulting in ruling limiting plaintiff to amount stipulated as due.

Pacific West Cable Company v. City of Sacramento, et al. (U.S. District Court, E.D. Cal.) Honorable Milton L. Schwarz, presiding. Twenty-nine day jury trial challenging municipal cable franchising activities. Favorable jury verdicts (see 672 F. Supp. 1322) led to $6,000,000 settlement for client as well as injunction permitting access to the market.

Nor-West Cable Communications Partnership v. City of St. Paul (U.S. District Court, D. Minn.) Honorable Joseph Alsop, presiding. Three month jury trial challenging municipal policy fostering monopolization of local cable television market.

Furniture Creations, Inc. v. Universal Furniture (Los Angeles Superior Court) Honorable Robert Einstein, presiding. Three week jury trial in breach of contract case resulting in $1,000,000 verdict for clients.

Robert M. Bramson Selected Published Decisions:

Klussman v. Cross Country Bank, 134 Cal.App.4th 1283 (2005).

Acree v. General Motors Acceptance Corp., 92 Cal.App.4th 385 (2001).

Heartland Communications, Inc. v. Sprint Corp., 161 F.R.D. 111 (D. Kan. 1995).

Preferred Communications, Inc. v. City of Los Angeles, 13 F.3d 1327 (9th Cir.), *cert. denied*, 512 U.S. 1235 (1994).

Gordon v. Ford Motor Credit Corp., 868 F. Supp. 1191 (N.D. Cal. 1992).

Century Federal, Inc. v. City of Palo Alto, 710 F.Supp. 1559 (N.D. Cal. 1988).

Pacific West Cable Company v. City of Sacramento, 672 F. Supp. 1322 (E.D. Cal. 1987) and693 F. Supp. 865 (E.D. Cal. 1988).

Colorado Springs Cablevision, Inc. v. Lively, 579 F. Supp. 252 (D. Colo. 1984).

Alan R. Plutzik

Alan R. Plutzik specializes in complex business litigation in federal and state courts. Areas of particular emphasis include consumer class actions, securities fraud and corporate governance litigation, antitrust and communications law. Mr. Plutzik is admitted to practice in California and the District of Columbia Bar (inactive member) and is a member of the bars of the United States Supreme Court, the Second, Third, Eighth, Ninth, Tenth and District of Columbia Circuits and a number of federal district courts.

Mr. Plutzik joined the firm upon his graduation from the University of California at Berkeley's Boalt Hall School of Law in 1977. He received his undergraduate degree from St. John's College, Annapolis, Maryland, in 1971, and holds an M. A. from Stanford University.

Mr. Plutzik has handled a wide variety of class actions and derivative cases. He has represented, among other clients,

- investors in securities class actions;

- shareholders in corporate derivative suits;

- victims of consumer fraud;

- parties alleging breach of contract by insurance companies and other corporations;

- limited partners challenging conduct by their general partners;

- consumers and businesses harmed by price-fixing and other anticompetitive conduct;

- employees in ERISA and wage/hour cases;

- property owners in litigation challenging policies that affect their property rights;

- purchasers of mislabeled and defective products;

- home buyers in suits brought under the Real Estate Settlement Procedures Act;

- victims of toxic pollution; and

- Subscribers to cellular, landline telephone, cable TV and Internet-delivered services.

Mr. Plutzik has also represented technology companies in litigation and arbitration, and broadcasters, cable television companies, communications common carriers and consumers in litigation and in administrative proceedings before the Federal Communications Commission and the California Public Utilities Commission. He has been designated a Northern California SuperLawyer.

Mr. Plutzik has written or lectured on topics that include class actions, California consumer law, substantive and procedural issues under the federal securities laws, First Amendment issues, cable television franchising and legal issues arising from cable television companies' access to utility poles and real estate developments. He has appeared as a guest radio commentator on the Len Tillem Show on KGO-Radio in San Francisco, discussing class actions, consumer protection law and investor rights.

Mr. Plutzik has served as a judge *pro tem* on the Contra Costa County (Cal.) Superior Court and as a Discovery Facilitator assisting the Court. From 2002 through early 2017, he was President of the Warren W. Eukel Teacher Trust, a charity that honors outstanding teachers in Contra Costa County. He currently serves as Treasurer and a Member of the Board of Directors of that organization.

Alan R. Plutzik Representative Cases

In re Pacific Bell Late Fee Litigation (Contra Costa County Superior Court). Mr. Plutzik was co-lead counsel for the plaintiffs in a consumer class action challenging the validity of a landline telephone company's late fees in light of California statutory limitations on liquidated damages. A $38 million settlement was negotiated and approved by the Court.

Patrick v. California Physicians' Service dba Blue Shield of California (San Francisco County, California Superior Court and United States District Court for the Northern District of California). Mr. Plutzik represented the plaintiffs in a class action for consumer fraud, unfair business practices and violations of ERISA arising from allegedly deceptive and unfair practices by a health insurance company in connection with patient co-payments for hospital treatment. A settlement of $20 million was negotiated after the close of discovery.

In re Cellphone Termination Fee Cases – Handset Locking Actions (Alameda County, California Superior Court). Mr. Plutzik served as co-lead counsel in five coordinated cases challenging the secret locking of cellphone handsets by major national wireless carriers to prevent consumers from activating them on competitive carriers' systems. Settlements were approved in all five cases on terms that required the cellphone carriers to disclose their handset locks to consumers and to provide unlocking codes nationwide on reasonable terms and conditions. The settlements fundamentally changed the landscape for cellphone consumers nationwide regarding the locking and unlocking of cellphone handsets.

In re Cellphone Termination Fee Cases – Early Termination Fee Cases (Alameda County, California Superior Court and Federal Communications Commission). Mr. Plutzik is Liaison Counsel and a member of the plaintiffs' Executive Committee in connection with claims challenging the validity under California law of early termination fees ("ETFs") imposed by national cellphone carriers. In one of those cases, against Verizon Wireless, a nationwide settlement was reached after three weeks of trial in the amount of $21 million. In a second case against Sprint, which was tried to verdict and affirmed on appeal, the Court ruled after trial that more than $73 million of flat early termination fees that Sprint PCS had collected from California consumers over an eight-year period were void and unenforceable, and enjoined Sprint from collecting an additional $225 million of such charges that had been billed but not

paid. The Court approved a settlement that left that injunction in place and provided for refunds to members of the Class. The ETF litigation has led to numerous published appellate decisions, including *In Re Cellphone Termination Fee Cases*, 186 Cal. App. 4th 1380 (2010), *Cellphone Termination Fee Cases* 193 Cal.App.4th 298 (2011), and *Ayyad v. Sprint Spectrum, L.P.*, 210 Cal.App.4th 851 (2012).

Guyette v. Viacom, Inc. (Alameda County, California Superior Court). Mr. Plutzik was co-counsel for a class of cable television subscribers who alleged that the defendant had improperly failed to share certain tax refunds with the subscribers. A settlement was negotiated shortly before trial under which defendants paid the class $13 million in cash.

Green v. Metropolitan Life Insurance Co. (San Francisco County, California Superior Court). Mr. Plutzik was co-counsel for a California class of MetLife policy holders in a class action alleging that MetLife had engaged in "twisting," "churning" and other misconduct in the sale of replacement life insurance policies. After the California class was certified, the case settled on a nationwide basis for consideration in excess of $1 billion.

In re Pacific Lumber Company Securities Litigation (United States District Court, Southern District of New York). Mr. Plutzik was counsel for the plaintiff class in a securities class action arising out of a tender offer for Pacific Lumber Company by a corporate raider. The plaintiff class recovered in excess of $140 million.

In re Worlds of Wonder Securities Litigation (United States District Court, Northern District of California). Mr. Plutzik was co-lead counsel for the plaintiff class in a securities fraud class action against officers, directors, venture capitalists and auditors of failed toy company in a case raising complex accounting and auditing issues. After percipient and expert discovery, summary judgment, appeal and remand, a settlement was reached against the company's auditor, Deloitte & Touche, LLP, for $9 million. The case resulted in a number of published opinions – *e.g., In re Worlds of Wonder Securities Litigation,* 35 F.3d 1407 (9th Cir. 1994), *cert. denied,* 516 U.S. 868 (1995); 694 F. Supp. 1427 (N.D. Cal. 1988); 721 F. Supp. 1140 (N.D. Cal. 1989); 1990 U.S. Dist. LEXIS 18396, [1990-91 Transfer Binder] Fed. Sec. L. Rep. (CCH) 95,689 (N.D. Cal. 1990); 147 F.R.D. 208 (N.D. Cal. 1992).

McCall v. Newkirk Capital LLC (Connecticut Superior Court, New Britain Judicial District). Mr. Plutzik represented a class of investors in 90 limited partnerships in a suit arising out of a consolidation, or "rollup," of the partnerships. A settlement was negotiated and approved by the Court that provided for the class to receive significant consideration, including cash, additional partnership units and a restructuring of certain assets and agreements with the general partner and its affiliates.

In re Daisy Systems Securities Litigation (United States District Court, Northern District of California). Mr. Plutzik represented a plaintiff class in a securities fraud class action against the directors and officers of a Silicon Valley company. A $13.1 million settlement was reached.

Hodge v. Franklin Select Realty Trust (San Mateo County, California Superior Court). Mr. Plutzik was co-counsel for a shareholder class in a claim against directors and officers of a

real estate investment trust and others, arising out of merger with two other related companies. A settlement of $4 million was negotiated.

Barnett v. Glenborough Pension Investors (San Mateo County, California Superior Court). Mr. Plutzik was co-counsel for a plaintiff class of limited partners in a claim against general partners, attorneys and lenders arising from the restructuring of a real estate limited partnership. A settlement of approximately $3 million was reached after the close of expert discovery.

In re Technical Equities Federal Securities Litigation (United States District Court, Northern District of California). Mr. Plutzik represented the plaintiff class in a securities fraud class action against directors, officers, auditors, attorneys, lenders and investment bankers of a public corporation that operated a complex Ponzi scheme. A global classwide settlement in the amount of $13 million was reached shortly before trial. *See In re Technical Equities Federal Securities Litigation*, 1988 U.S. Dist. LEXIS 15813, [1988-89 Transfer Binder] Fed. Sec. L. Rep. (CCH) P 94, 093 (N.D. Cal. Oct. 3, 1988)

Daniels v. Centennial Group (Orange County, California Superior Court). Mr. Plutzik was co-counsel for the plaintiff class in a claim for fraud, negligent misrepresentation and breach of fiduciary duty against general partners and promoters arising from a "roll-up" of six real estate limited partnerships. A settlement of approximately $4 million was reached on behalf of the investors. The case resulted in an important published opinion regarding the standards for class certification under California law – *Daniels v. Centennial Group, Inc.*, 16 Cal.App.4th 467 (1993).

Harbor Finance Partners v. BKP Capital Management et al. (San Francisco County Superior Court). Mr. Plutzik was co-counsel for a plaintiff class consisting of both individual and institutional investors in an action asserting claims of misrepresentation, breach of fiduciary duty and unfair business practices against a hedge fund, its general partner, its auditor and others. The action settled on terms favorable to the class.

Condes v. Evercom et al. (Alameda County, California Superior Court). Mr. Plutzik was co-counsel for a class of recipients of inmate telephone calls. A partial class settlement which, together with individual settlements, resulted in the recovery of more than $1 million was negotiated and approved by the Court.

NV Security, Inc. v. Fluke Networks, Inc. (U.S. District Court, Central District of California). Mr. Plutzik was counsel in a class action on behalf of purchasers of allegedly defective telephone line equipment. A settlement was negotiated that included monetary and injunctive relief for class members.

McCullough v. Jameson (United States District Court for the Northern District of California) – Individual and derivative case on behalf of shareholders of a privately held oil company for alleged misappropriation of corporate opportunities and other breaches of fiduciary duties. The case settled favorably.

Stock Options Backdating Derivative Cases (United States District Court, Northern District of California) – Mr. Plutzik served as Liaison Counsel in a number of corporate derivative cases in the United States District Court for the Northern District of California alleging the improper backdating of stock options, including *In re Integrated Silicon Solutions Derivative Cases*, *In re Actel Derivative Cases* and *In re Chordiant Derivative Cases*. Successful results were achieved in all of those cases.

In re Washington Public Power Supply Securities Litigation (United States Court of Appeals for the Ninth Circuit) – Mr. Plutzik represented a class action law firm in a case that established important principles regarding the compensation of plaintiffs' counsel in federal class actions. The case resulted in a published opinion. *In re Washington Public Power Supply Sys. Sec. Litig.*, 19 F.3d 1291, 1300 (9th Cir. 1994).

Antitrust Direct and Indirect Purchaser Class Actions – Mr. Plutzik has served in a leadership position in numerous antitrust class actions, including *In re Methionine Direct Purchaser Antitrust Litigation* (United States District Court for the Northern District of California), *In re California Indirect Purchaser MSG Antitrust Litigation* (San Francisco County Superior Court) and *In re California Infant Formula Indirect Purchaser Antitrust Litigation* (San Francisco County Superior Court).

LBM Properties v. DirecTV, LLC – Mr. Plutzik is co-counsel for a class of owners of rental properties who are challenging the installation practices of a large satellite provider.

California Community Television Association v. Pacific Gas & Electric Company (Alameda County, California Superior Court), *Group Cable v. PG&E* (United States District Court for the Northern District of California) and *California Community Television Association v. Pacific Gas & Electric Company* (California Public Utilities Commission) – associational and class action cases alleging antitrust and related business tort claims for denial of access to utility poles on reasonable terms, and administrative action seeking regulatory ruling setting fair and reasonable prices and terms, brought on behalf of California cable television companies against a public utility. The cases were settled on terms that permitted favorable conditions of access to the poles.

Lucero v. Frederick's of Hollywood, Inc. (Santa Clara County, California Superior Court). Mr. Plutzik served as lead counsel for an employee class in this wage and hour class action. A $950,000 settlement was approved by the Court.

USA Media Group LLC v. Truckee Donner Public Utility District (United States District Court for the Eastern District of California). Mr. Plutzik represented a cable television company in a claim brought against a public utility district for constitutional and antitrust violations and related state-law claims arising from restrictions imposed by the public utility district on the cable television company's access to utility poles owned by the public utility district, which was planning to offer competitive cable television service. The case settled on terms that permitted the cable television company to continue to obtain access the poles on reasonable terms and conditions.

Tele-Communications of Key West, Inc. v. United States (United States District Court, District of the District of Columbia). Mr. Plutzik represented a cable television company in constitutional litigation arising from its provision of service on Homestead Air Force Base. *Telecommunications of Key West, Inc. v. United States*, 757 F.2d 1330 (D.C. Cir. 1985).

Citizens Cable Communications Co. v. Cox Cable Communications Co. (United States District Court for the Northern District of Indiana). Mr. Plutzik represented a cable television company in litigation arising from an option to purchase a cable television system in a neighboring community. The case settled favorably during trial.

Daniel E. Birkhaeuser

Daniel E. Birkhaeuser received his law degree from the University of California, Davis in 1988. While at Davis, he served as an Editor of the *U.C. Davis Law Review*.

Following graduation, Mr. Birkhaeuser joined the law firm of McCutchen, Doyle, Brown and Enersen. At the McCutchen firm, he represented plaintiffs and defendants in a wide variety of complex civil litigation matters including real estate, bankruptcy and environmental litigation. In 1991, Mr. Birkhaeuser co-chaired an eight week trial in *Quadrant Corporation v. First Interstate Bank*, Contra Costa County Superior Court Action No. C90-03855 recovering for his client over $15 million which, at that time, was the largest jury verdict in Contra Costa County history.

In 1992, Mr. Birkhaeuser began to focus his career on class action litigation at the trial and appellate levels. One such matter, *Harris v. Chase Manhattan Bank*, N.A. (1994) 34 Cal. App. 4th 1563, resulted in a favorable decision, the reasoning of which was affirmed by the California Supreme Court in a companion case entitled *Smiley v. Citibank* (1995) 11 Cal. 4th 138, and ultimately by the United States Supreme Court in the same case. *Smiley v. Citibank* (1996) 517 U.S. 735.

Mr. Birkhaeuser joined the firm in 1994 and became a partner in 1997. At the firm, he has prosecuted class action cases involving insurance, false nutritional labeling, price fixing and securities fraud. Mr. Birkhaeuser served in a leadership position in *In Re Kansas Vitamin Antitrust Litigation* and *In re Wisconsin Vitamin Antitrust Litigation*, which were coordinated through proceedings in the District of Columbia and consolidated with *parens patriae* actions brought by attorneys general in 23 jurisdictions. He served on plaintiffs' Executive Committee in *In re DRAM California Indirect Purchaser Antitrust Litigation* and *In re California Polyester Indirect Purchaser Antitrust Litigation*, and serves as Co-Lead Counsel in *In Re Korean Ramen Indirect Purchaser Antitrust Litigation*. He has also represented indirect purchaser plaintiffs in antitrust matters alleging price fixing in the "Flash Memory," Cathode Ray Tube, Automobile, and Paper industries. He has also served as a judge *pro tem* in the Contra Costa Superior Court.

Other Significant Cases:

Van Warmerdam v. Honey Hill Farms (arbitration) Honorable William Boone, presiding. Lead counsel in complex contract dispute resulting in verdict in client's favor on complaint and cross-complaint.

Meadow Wood Land Company v. Landmark Vineyards, Ltd, et. al., First Appellate District No. AO43692. Lead counsel for defendants and respondents in case which settled favorably after the filing of Respondents' brief on appeal.

Lesher Communications, Inc. v. City of Walnut Creek, 52 Cal. 3d 531 (1991). Landmark decision under California Environmental Quality Act addressing City's ability to amend general plan by voter initiative.

Acree v. General Motors, Inc., 92 Cal. App. 4th 385 (2001). Important decision defining scope of covenant of good faith and fair dealing and reasonableness of fee award after class action trial against tenacious defendant.

Morelli v. Weider Nutrition Group, Inc., 275 A.D.2d 607, 712 N.Y.S. 2d 551 (1st Dept. 2000). Case of first impression holding that plaintiffs' claims for false nutritional labeling were not preempted by the Nutritional Labeling and Education Act.

Figueroa v. Sharper Image Corp., 517 F. Supp. 2d 1292 (S.D. Fla. 2007). Lead counsel for objector/class member in state court action who, joined by attorneys general from 35 states, successfully defeated settlement of later-filed federal action on the ground that the settlement was unfair.

Vassalle v. Midland Funding, 708 F. 3d 747 (6th Cir. 2013) Co-lead counsel for objector in which the Court rejected a proposed class action settlement of claims relating to affidavits containing false representations of personal knowledge.

Jennifer S. Rosenberg

Jennifer S. Rosenberg is senior counsel with the firm. She received her A.B. in political science, with great distinction in general scholarship, in 1981 from the University of California at Berkeley. She is a member of Phi Beta Kappa. Ms. Rosenberg obtained her law degree from the University of California at Berkeley (Boalt Hall) in 1985.

From 1985 to 1987, Ms. Rosenberg was an associate with the law firm of McKenna, Conner & Cuneo, specializing in banking law. Before joining Bramson, Plutzik, Mahler & Birkhaeuser, she was associated with McCutchen, Doyle, Brown & Enersen, practicing commercial litigation and land use litigation. As an adjunct professor at the University of San Francisco, she has taught business law and business ethics in the undergraduate and MBA programs of the McLaren School of Business.

Ms. Rosenberg is a contributing writer for Justice Maria Rivera's *California Practice Guide: Civil Procedure Before Trial Forms* (The Rutter Group), the companion volume to Weil & Brown, *California Practice Guide: Civil Procedure Before Trial* (The Rutter Group). She is the principal drafter and editor of the Guide's class action forms. She has published articles in *California Lawyer* and *Business Voice* magazines and edited the 1994 edition of Remy, Thomas & Moose's *Guide to the California Environmental Quality Act*.

At Bramson, Plutzik, Mahler & Birkhaeuser, Ms. Rosenberg has focused on the prosecution of consumer class actions. Ms. Rosenberg is admitted to practice in California and is a member of the bars of the federal district courts of California and of the Ninth Circuit. She has acted as a judge pro tem for civil matters and as a small claims appeals judge in Superior Court, as well as a fee arbitrator.

Selected Published Decisions:

Ayyad v. Sprint Spectrum, L.P., 210 Cal.App.4th 851 (2012)

Figueroa v. Sharper Image Corporation, 517 F.Supp.2d 1292 (S.D. Fla. 2007)

Acree v. General Motors Acceptance Corporation, 92 Cal. App. 4th 385 (2001)

Mangini v. Aerojet-General Corporation, 230 Cal.App.3d 1125 (1991)

Michael S. Strimling

Michael S. Strimling has extensive experience in complex litigation and class actions. He received his J.D. from Boalt Hall Law School at U.C. Berkeley and was admitted to the California Bar in 1980. As well as actively prosecuting class actions and mass tort litigation while at Lieff, Cabraser, Heimann & Bernstein, at Bramson, Plutzik, Mahler & Birkhaeuser, LLP, and of counsel in other complex litigation, he has defended class actions while associated with Bartko, Zankel, Tarrant & Miller and Wendel, Rosen, Black & Dean.

In addition, Mr. Strimling has served as the Research Attorney for the Complex Litigation Department of the Santa Clara County Superior Court, as a Senior Research Attorney to the California Sixth District Court of Appeal, as a Research Attorney to the Alameda County Superior Court, as a Legal Advisor to the Solomon Islands government in the United States Peace Corps, and as a three-term member of the California State Bar's Committee on the Administration of Justice. In addition to admission before State and Federal District Courts he has been admitted to the Bar and argued before the U.S. Court of Federal Claims in Washington, D.C., lectured in continuing legal education seminars, published articles on derivative litigation, and been admitted to the New Zealand and Solomon Islands Bar.

Jenelle Welling

Jenelle Welling graduated from the University of California, Hastings College of the Law in 2000, where she was honored with the American Jurisprudence Award in both Moot Court and Trial Advocacy. She also was a member of the Hastings Women's Law Journal. Prior to law school, Ms. Welling received a Masters Degree in Public Policy from the University of California at Berkeley. She graduated with Highest Honors from the University of California at San Diego with a Bachelor of Arts degree in Political Science. Recognized as a Rising Star by the Super Lawyers of Northern California in 2010 and 2011, Ms. Welling is a member of the

National Association of Consumer Advocates, the Consumer Attorneys of California, and the Contra Costa County Bar Association. Her primary practice area is complex and class action litigation in consumer financial services and consumer products. She also practices in antitrust and commercial litigation. She has lectured on the Truth in Billing Act, mediating consumer class actions, and presented seminars on the basics of consumer class action litigation for plaintiffs' lawyers.

Some of the clients and plaintiff classes Ms. Welling has represented include:

- *In re: Ford Explorer Cases, J.C.C.P. Nos. 4266 & 4270.* Ms. Welling, along with co-counsel, represented a class of California consumers alleging that Ford withheld material information about the rollover propensity of the Ford Explorer. Ms. Welling was a member of the 5-person trial team that presented plaintiffs' case over the course of a 50-day trial, and was primarily responsible for presenting expert testimony in support of restitution under Business & Professions Code §17200 totaling more than $500 million. The case settled on the eve of closing argument and ultimately provided injunctive relief that will inure to the benefit of consumers nationwide, as well as the opportunity for monetary redress for consumers in California, Texas, Illinois, and Connecticut.

- *In re CARB Compliant Gasoline Cases II, JCCP No. 4449.* Jenelle Welling served as co-liaison counsel in this anti-trust action filed in California Superior Court. Plaintiffs allege that Union Oil Company misled the California Air Resources Board (CARB) into adopting standards for the composition of summertime reformulated gasoline that overlapped with Union Oil Company's then undisclosed and pending patents. Through this alleged deception and other alleged anti-competitive acts, California consumers in the downstream market allegedly overpaid for summertime CARB-complaint gasoline. A settlement providing $48 million in cy pres was approved by the court in 2008.

- *In re: Baycol Cases I and II.* This action alleges that Bayer's advertisement and sale of the cholesterol drug Baycol, which was ultimately pulled from the market for safety risks, violated California's Unfair Competition Law. In February 2011, Ms. Welling successfully overturned an appellate opinion, and obtained a ruling in Plaintiff's favor on important class action procedural issues. *See In re Baycol Cases I and II,* (2011) 51 Cal.4th 751.

- *Brothers v. Hewlett-Packard.* In this case, Ms. Welling secured speedy relief for owners nationwide of certain HP laptop computers that were alleged to contain a defect associated with an advanced graphics card. Consumers received a new, equally performing graphics card at no expense and a refund of 100% of expenses associated with any repair of the alleged defect. This case also generated the first decision within the Ninth Circuit establishing federal jurisdiction under CAFA for Magnuson-Moss claims without the 100 plaintiff jurisdictional requirement. *See Brothers v. Hewlett Packard, Co.*, Case No. 06-02254, 2007 WL 485979 (N.D. Cal. Feb. 12, 2007).

- *In re: Tenet Healthcare Cases II.* Jenelle Welling served on the Plaintiffs' Executive Committee in this consolidated action that obtained redress for uninsured consumers who received treatment from one of Tenet Healthcare's 42 California hospitals. The complaint alleged Tenet charged exorbitant and unconscionable prices, for example, marking up prescription drugs 1,038% on average, to increase revenues and profits. A national settlement was approved in August 2005 that provides for restitution, injunctive relief and $4 million of cy pres damages. The settlement has been hailed as a model for how the nation's uninsured population should be billed for hospital care.

- *Prata v. Bank One*. Ms. Welling, along with co-counsel, represented the plaintiff class in this case involving "Same as Cash" credit card financing claims. The Superior Court in Los Angeles approved a $3 million cash settlement for California consumers who participated in the "Same as Cash" financing plan. Litigation of this case resulted in a oft-cited opinion interpreting Bus. & Prof. Code § 17200, *Prata v. Sup. Ct.* (2001) 91 Cal. App. 4th 1128.

- *Starkey v. Rusnak BMW*. Ms. Welling led this class action asserting that expensive BMW wheels on new cars were secretly replaced before sale with lower value after market wheels. The action was resolved quickly to the benefit of the class, and included an agreement by the dealer to refrain from selling after market wheels on new cars.

- *Prata v. GE Capital*. Ms. Welling, along with co-counsel, restored another $2.5 million to Californians who were duped by the "Same as Cash" advertising slogan and program that GE bought from Bank One. GE also agreed to refrain from using the "Same as Cash" slogan to advertise financing plans that require minimum monthly payments.

Paul F. Mahler (Of Counsel)

Paul F. Mahler is a 1980 graduate of the University of California, Boalt Hall School of Law. After working several years in-house at a major educational company headquartered in San Francisco, Mr. Mahler joined the firm in 1985, became a partner in 1997 and is currently of counsel to the firm.

Mr. Mahler handles business transactions, representing primarily small and medium-sized businesses. Mr. Mahler's transactional work includes entity formation and agreements among owners; the purchase and sale of assets, stock or other interests; intellectual property issues; employment matters; and commercial real estate matters, primarily in leasing. His clients include high technology companies, biotechnology companies, accounting and insurance firms and companies with significant retail store operations.

EXHIBIT B

Case 4:13-md-02420-YGR Document 1497-9 Filed 04/03/17 Page 1 of 2

Exhibit B

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

Firm Name:Bramson, Plutzik, Mahler & Birkhaeuser, LLP **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Daniel E. Birkhaeuser											4.50				4.50	$795.00	$3,577.50
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.50**	**0.00**	**0.00**	**0.00**	**4.50**		**$3,577.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.50**	**0.00**	**0.00**	**0.00**	**4.50**		**$3,577.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BRAMSON, PLUTZIK, MAHLER && BIRKHAEUSER, LI{E

ATTORNEYS	DATE RANGE	HOURLY RATE
Daniel E. Birkhaeuser	1/1/13 – 12/31/13	675.0
Daniel E. Birkhaeuser	1/1/14 – 12/31/14	710.00
Daniel E. Birkhaeuser	1/1/15 – 12/31/15	745.00
–		

NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

(REDACTED)

BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP
2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598
925-945-0200

Lithium Ion Batteries Antitrust

May 23, 2017
Account No: LITHI-PHAM
Invoice No: 2425

Exhibit D

v. Tom Pham

Services

		Hours
07/01/2013 DEB	Call from Mr. Le re protective order (.1); call to Mr. Mills re same (.1); [redacted] (.1); email to Mr. le re response (.1).	0.40
10/09/2014 DEB	Review prior emails from [redacted] re purchase and photograph of battery (.2); emails to Mr. Mills and client re same (.2); review emails from co--counsel re declaration (.1); email to Mr. Mills and Mr. [redacted] re same (.2).	0.70
10/10/2014 DEB	Email to co-counsel re [redacted] declaration; emails [redacted] re same.	0.10
04/23/2015 DEB	Call from Ms. Voight re written discovery to clients (.2); email to Mr. Mills re same (.1); conversation with Mr. Reich re same (.1).	0.40
05/01/2015 DEB	Review written discovery to plaintiffs (.2); call to Mr. Reich re same (.1); call to Carla re same (.1).	0.40
05/04/2015 DEB	Email to client re call and previous questionnaire (.3); [redacted] .3); conference call with co-counsel re discovery (.3).	0.90
05/11/2015 DEB	Review and respond to email from Ms. Voight re interrogatories (.3); call to Mr. Lambrinos re same (.1); review draft responses (.3); [redacted] .2); email to Mr. Caylao re typo (.1); email to [redacted] re draft responses (.2).	1.20
06/09/2015 DEB	Review motions and orders re early summary judgment(.1); email to Mr. Lambrinos re same and re orders obtained in separate antitrust action(.3).	0.40
	Current fees through 12/31/2015	4.50 3,296.50

v. Tom Pham

Summary

Timekeeper	Title	Hours	Rate	Total
Daniel E. Birkhaeuser	Partner	0.40	$675.00	$270.00
Daniel E. Birkhaeuser	Partner	0.80	710.00	568.00
Daniel E. Birkhaeuser	Partner	3.30	745.00	2,458.50

Total Current Fees	3,296.50
	$3,296.50

EXHIBIT E

Firm Name - Bramson, Plutzik, Mahler & Birkhaeuser, LLP

IN RE: LITHIUM ION BATTERIES INDIRECT
REPORT - June, 2013- February, 2017

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				$0.00
Court Costs	Filing Fees	$350.00	$0.00	$350.00
Experts/consultants				$0.00
Federal Express				$0.00
Hearing Transcripts				$0.00
Investigation				$0.00
Lexis/westlaw				$0.00
Messenger/delivery				$0.00
Photocopies - in House				$0.00
Photocopies - Outside				$0.00
Postage				$0.00
Service of Process				$0.00
Special Supplies				$0.00
Telephone/telecopier				$0.00
Travel				$0.00
Miscellaneous				$0.00
TOTAL		**$350.00**	**$0.00**	**$350.00**

EXHIBIT 13

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF J. GERARD STRANCH, IV IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BRANSTETTER, STRANCH & JENNINGS, PLLC**

I, J. Gerard Stranch, IV, declare:

1. I am J. Gerard Stranch, IV of Branstetter, Stranch & Jennings, PLLC, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Caleb Batey, and as counsel for IPPs throughout the course of this litigation. The background and experience of Branstetter, Stranch & Jennings, PLLC and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Branstetter, Stranch & Jennings, PLLC performed the following work: reviewing the complaints in this matter and meeting with class representative to review and answer his questions; collect and review discovery responses and documents from the class representative; collaborating with lead counsel and other IPP counsel to coordinate the litigation on behalf of the class; apprising class representative of all relevant and notable case filings; meet with and prepare class representative for his deposition; defend class representative's deposition; coordinate discussions between IPP counsel and class representative regarding the status of settlement discussions.

5. Attached hereto as **Exhibit B** is a billing summary of Branstetter, Stranch & Jennings, PLLC's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total

number of hours spent by Branstetter, Stranch & Jennings, PLLC during this period of time was 21.5 hours, with a corresponding lodestar based on current rates of $15,672.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Branstetter, Stranch & Jennings, PLLC.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Branstetter, Stranch & Jennings, PLLC has incurred during the course of this litigation Branstetter, Stranch & Jennings, PLLC expended a total of **$7,067.37** in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Branstetter, Stranch & Jennings, PLLC on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Branstetter, Stranch & Jennings, PLLC in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017 at Nashville, Tennessee.

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

BS&J BRANSTETTER STRANCH & JENNINGS PLLC



THE FREEDOM CENTER
223 ROSA L. PARKS AVE., SUITE 200
NASHVILLE, TENNESSEE 37203
615-254-8801
FAX: 615-255-5419

FOR OVER SIXTY YEARS, Branstetter, Stranch & Jennings, PLLC has been known for the quality of its advocacy, and the integrity of its attorneys. The Firm enjoys a national reputation of prominence in the complex litigation arena for its work in class actions, shareholder derivative claims, securities, ERISA, labor and employment, and other complex cases, both at the trial and appellate levels.

Currently comprised of ten (10) Members, six (6) Associates and one (1) Of Counsel, the firm is dedicated to providing a full range of legal services to its diverse clientele. In addition to providing quality legal services, the firm is proud of the professional and civic leadership that its members have provided both locally and nationally. Our former Managing Partner, Jane Branstetter Stranch, was nominated by President Obama to the United States Court of Appeals for the Sixth Circuit, and now serves as judge on that court following her confirmation by the U.S. Senate. Branstetter, Stranch & Jennings, PLLC firm is listed in the Bar Register of Preeminent Lawyers, and was recently named among "Best Law Firms" by U.S. News & World Report for 2017, receiving the highest possible Nashville ranking as a Tier 1 in two practice areas.

YEAR ESTABLISHED:

1952

STATEMENT OF PRACTICE:

General Litigation Practice in State, Federal and Appellate Courts; Class Actions and Complex Litigation; Mass Tort; Antitrust Law; Securities Law; Shareholder Derivative Law; Wage & Hour Law; Consumer Protection; Labor and Employment Law; ERISA and Pension Law; Commercial Litigation; Utility Law; Municipal Law; Personal Injury; Workers' Compensation; and, Social Security Claims.

Members and Associates:

Cecil D. Branstetter, (Member Emeritus – Deceased May 7, 2014) born Morgan County, Tennessee; admitted to bar, 1949, Tennessee. **Education:** Lincoln Memorial University and George Washington University (B.A., 1946); Oxford University, England and Vanderbilt University (J.D., 1949). Order of the Coif; Delta Theta Phi. Member, Board of Editors, Vanderbilt Law Review, 1949. Member, Tennessee Legislature, 1951-1953. **Member:** Past Chairperson, Tennessee Disciplinary Board of Tennessee; Nashville Bar Association (President, Junior Section, 1952-1953) and American Bar Associations; Nashville and Tennessee Bar Foundations; Tennessee Association of Criminal Defense Lawyers, Tennessee Trial Lawyers; American Board of Trial Advocates; The Association of Trial Lawyers of America; Founder, Tennessee Environmental Council; Past President, Tennessee Conversation League; Recipient, John Tune Award, Nashville Bar Association. **Practice Areas:** Personal Injury; Public Utility Law; Regulated Industries; Municipal Law; Labor & Employment; Administrative Law; Civil Litigation; Criminal Law.

James G. Stranch, III, (Member) born Abbeville, South Carolina; admitted to bar, 1973, Tennessee; 1974, U.S. District Court, Middle District of Tennessee; U.S. Tax Court; 1980, U.S. Supreme Court; 1982, U.S. Court of Appeals, Sixth Circuit, 1986; Eight Circuit, 2011; Ninth Circuit, 2008; U.S. District Court, Eastern District of Tennessee; 2008, U.S. District Court, Western District of Tennessee; 2002, U.S. District Court, Colorado. **Education:** Dobbins-Bennett High School, Kingsport, Tennessee; University of Tennessee (B.S., 1969; J.D., 1973). Phi Delta Phi. **Member:** Tennessee State Ethics Commission (Chairman, 2011 – Present); Tennessee Appellate Court Nominating Committee (Secretary, 1985-1991); AFL-CIO Lawyer's Coordinating Advisory Committee (1980-presnt); Nashville Bar Association (1973 – Present); Tennessee Bar Association (Chairman, Labor Law Section, 1991-1992; member 1973-present) and American Bar Associations (1973-present); American and Tennessee Association for Justice (1974 – Present);. **Practice Areas:** Labor & Employment; Class Actions and Complex Litigation; Shareholder Derivative Law; Consumer Protection; ERISA; Securities Law; Civil Litigation; Personal Injury; Auto & Trucking; and Municipal Law.

R. Jan Jennings, (Member); admitted to bar, 1975, Tennessee and U.S. District Court, Eastern District of Tennessee; 1976, Georgia and U.S. Court of Appeals, Fifth Circuit; 1979, U.S. Court of Appeals, Sixth Circuit; 1981, U.S. Court of Appeals, Eleventh Circuit; 1984, U.S. Court of Appeals for the Federal Circuit and U.S. Supreme Court. **Education:** East Tennessee State University (B.S., 1964; M.B.A., 1966); University of Tennessee at Knoxville (J.D., 1974). Editor, Tennessee Law Review, 1973-1974. Member, Panel of Arbitrators, American Arbitration Association. **Member:** Tennessee Bar Association; State Bar of Georgia. **Practice Areas:** Litigation; ERISA; Labor; Personal Injury.

Donald L. Scholes, (Member) born Nashville, Tennessee; admitted to bar, 1982, Tennessee. **Education**: Belmont College (B.S., 1977); University of Tennessee (J.D., 1982). Research Editor, Tennessee Law Review, 1981-1982; Assistant General Counsel, Tennessee Public Service Commission, 1983-1987. **Member:** Nashville and Tennessee Bar Associations. **Practice Areas:** Municipal; Public Utility; Workers Compensation; Social Security.

J. Gerard Stranch, IV, (Member) born Nashville, Tennessee; admitted to bar, 2003, Tennessee, U.S. District Court, Middle District of Tennessee; 2005, U.S. District Court, Eastern District of Tennessee; 2008, U.S. District Court for Western Tennessee; 2004 U.S. Court of Appeals, Sixth Circuit. **Education**:

Emory University (B.A. 2000); Vanderbilt University Law School (J.D., 2003). Adjunct Professor of Law, Vanderbilt University Law School (2011 – Present). **Member:** Nashville and Tennessee Bar Associations; American and Tennessee Association for Justice (Governor), Class Action Trial Lawyers Association executive committee member, and AFL-CIO Lawyers Coordinating Committee; Top 40 Under 40 by the National Trial Lawyers Association. **Practice Areas:** Class Actions and Complex Litigation; Mass Torts; Securities Law; Labor & Employment; Consumer Protection; ERISA; Civil Litigation; Personal Injury and Wrongful Death.

Joe P. Leniski, Jr., (Member) born Mishawaka, Indiana; admitted to bar, 2003, Tennessee; 2004, U.S. District Court, Middle District of Tennessee; 2005, U.S. District Court, Eastern District of Tennessee; 2008, U.S. District Court for Western Tennessee; 2005, U.S. Court of Appeals for the First, Third, and Sixth Circuit; **Education:** University of Notre Dame (B.A., cum laude, 2000), Vanderbilt University Law School (J.D., 2003). Vanderbilt Bar Association, President; Trial Advocacy Association, member; Vanderbilt Juvenile Practice Clinic. **Member:** Nashville and Tennessee Bar Associations; American Bar Association; Harry Phillips American Inn of Court; Super Lawyers, 2012-2016; Class Action Trial Lawyers Top 25; Mass Tort Trial Lawyers Top 25; The National Trial Lawyers Top 100 Civil Plaintiff. **Practice Areas:** Civil Litigation; Class Actions and Complex Litigation; Antitrust Law; Shareholder Derivative Law; Labor & Employment; Consumer Protection; and ERISA.

Michael G. Stewart, (Member) born Alexandria, Virginia; admitted to bar, 1994. **Education:** University of Pennsylvania (B.A. 1987); University of Tennessee College of Law (J.D. 1994). **Member:** Nashville, Tennessee, and American Bar Associations; Member & House Caucus Leader, Tennessee House of Representatives (2008 – Present). **Practice Areas:** Class Actions and Complex Litigation; Securities; Consumer Protection.

Michael J. Wall, (Member) born Cincinnati, Ohio; admitted to bar, 2005, Tennessee; 2006, U.S. District Court, Middle District of Tennessee; 2008, U.S. District Court, Western District of Tennessee; 2009, U.S. District Court, Eastern District of Tennessee; 2006, U.S. Court of Appeals, 6th Circuit; 2010, U.S. Court of Appeals, 11th Circuit; 2011, U.S. Court of Appeals, 8th Circuit; 2009, U.S. Supreme Court. **Education:** Vanderbilt University (B.A., 2002); Vanderbilt University Law School (J.D., 2005). **Member:** Nashville, Tennessee, and American Bar Associations. **Practice Areas:** Civil Litigation; Labor & Employment; ERISA; Class Actions and Complex Litigation.

Karla M. Campbell, (Member), admitted to Tennessee Bar 2008, U.S. District Court, Middle District of Tennessee 2011, U.S. Court of Appeals, 6th Circuit 2011; **Education**: University of Virginia (B.S., 2002); Georgetown University Law Center (J.D., 2008); **Clerkship:** Hon. Jane B. Stranch, U.S. Court of Appeals, 6th Circuit (2010-2011); **Member**: Nashville, Tennessee, and American Bar Associations; **Director:** AFL-CIO Lawyers Coordinating Committee; **Practice Areas**: Civil Litigation; Labor & Employment; Complex Litigation; ERISA. Also noteworthy is that Ms. Campbell speaks fluent Spanish.

Benjamin A. Gastel, (Member), admitted to Georgia Bar 2007, Georgia Court of Appeals 2008, U.S. District Court, Northern District of Georgia 2008, Georgia Supreme Court 2010, Tennessee Bar 2010, Tennessee Supreme Court 2010, U.S. District Court, Middle District of Tennessee, 2011. **Education**: University of Dayton (B.S., 2004); Vanderbilt School of Law (J.D., 2007). **Member**: Nashville, Tennessee, Georgia, and American Bar Associations. **Practice Areas**: Class Actions and Complex Litigation; Civil Litigation; Consumer Securities and Fraud, Antitrust Litigation; and Labor & Employment.

Tricia Herzfeld, (Member), admitted to the Tennessee Bar (2007), Florida Bar (2001), and West Virginia Bar (2004), U.S. District Court Middle District of Tennessee (2008), U.S. District Court Eastern District of

Tennessee (2010), U.S. District Court of Western Tennessee, 2010, U.S. District Court Southern District of West Virginia (2005), U.S. Court of Appeals, Sixth Circuit (2017), U.S. District Court, Fifth Circuit (2013), U.S. Immigration Courts (2015). **Education:** George Washington University (B.A.1998); George Washington University Law School (2001). **Member:** Super Lawyers (2012-2016), Davidson County Election Commission, (2012-present). **Practice Areas:** Complex Litigation, Personal Injury, and Civil Rights.

Seamus T. Kelly, (Associate), admitted to Tennessee Bar 2013. **Education**: Trinity College, University of Dublin (B.A., 2004); Vanderbilt School of Law (J.D., 2013). **Member**: Nashville, Tennessee, and American Bar Associations. **Practice Areas**: Class Actions and Complex Litigation; Civil Litigation; Consumer Securities and Fraud; Consumer Protection; and Labor & Employment.

Anthony A. Orlandi, (Associate), admitted to Tennessee; Massachusetts; U.S. District Court, District of Massachusetts; U.S. District Courts, Eastern, Middle, and Western Districts of Tennessee; **Education:** Brown University, B.A., Public Policy & American Institutions, Phi Beta Kappa; University of Virginia School of Law (J.D.), Earle K. Shawe Labor Relations Award **Member**: Member, American, Tennessee, and Nashville Bar Associations; Phi Beta Kappa, National Chapter and Rhode Island Chapter Board Member Law Association for Women, Nashville Chapter Board Member; Nashville Bar Association Diversity Committee; Nashville Bar Association Social Committee; Harry Phillips American Inn of Court; Tennessee Bar Association Leadership Law Class of 2017 **Experience:** Law Clerk, Hon. Aleta A. Trauger, U.S. District Court for the Middle District of Tenn. **Practice Areas:** Complex Litigation; Employment Law; Personal Injury; Products Liability

Gabriel G. Galletti (Associate) born Denville, New Jersey; admitted to bar, 2005, New York; admission pending, 2016, Tennessee; U.S. District Court, Southern District of New York, 2008; U.S. District Court, Eastern District of New York, 2008. **Education:** Dartmouth College (A.B., 1998); University of Virginia School of Law (J.D., 2004). **Member:** American Constitution Society; Dartmouth Lawyers Association. **Experience**: Associate, Simpson Thacher & Bartlett LLP (2004-2008); Law Clerk, Hon. Peter G. Sheridan, U.S. District Court Judge for the District of New Jersey (2008-2009); Associate, Bernstein Liebhard LLP (2009-2016). **Practice Areas:** Class Actions and Complex Litigation; Antitrust; Securities; Landlord/Tenant; Mass Torts; Appeals.

Kathleen Grace Stranch, (Associate), admitted to the Tennessee Bar 2014, U.S. District Court of Eastern Tennessee, U.S. District Court of Middle Tennessee; U. S. District Court of Western Tennessee. **Education**: Rhodes College (2010); University of Tennessee College of Law (2014); **Practice Areas**: Utility, Social Security, Probate, and Civil Litigation.

Callie Jennings, (Associate), admitted to the Tennessee Bar 2016. **Education**: Macalester College (2011); University of Buenos Aires, Argentina (2011); University of Tennessee College of Law (2016); **Practice Areas**: Labor & Employment, ERISA, Immigration, Civil Litigation

Isaac Miller, (Associate), admitted to the Tennessee bar, 2016, California Bar, 2009, U.S. District Court, Northern District of California, U.S. District Court, Eastern District of California, U.S. District Court, Central District of California, U.S. Court of Appeals, 9th Circuit. **Education**: Vanderbilt University (B.A., *summa cum laude*, 2006); Pepperdine University School of Law (J.D. 2009). **Member**: American Association for Justice; American Bar Association; Nashville Bar Association; Tennessee Bar Association. **Experience**: Baron & Budd, P.C. (2013 - 2016); Milstein Adelman, LLP (2009 – 2013);

Judicial Extern, Hon. Consuelo B. Marshall, U.S. District Court Judge for the Central District of California; Law Clerk, U.S. Attorney's Office for the District of Colorado. **Practice Areas**: Class Actions and Complex Litigation.

Robert E. Richardson, Jr., (Of Counsel) born Cincinnati, Ohio,; admitted to bar, Ohio; **Education**: University of Cincinnati (BSE) University of Cincinnati (J.D.) **Member:** Ohio Bar Association, Cincinnati Branch of the NAACP, the Cincinnati Park Board, the Hamilton Democratic Executive Board, and the Lawyers Coordinating Committee for the AFL-CIO and the Board of Trustees of the University of Cincinnati. **Practice Areas**: Labor and Employment, Products Liability Litigation, and General Litigation.

Noteworthy Cases:

Branstetter, Stranch & Jennings, PLLC has served either as lead counsel or as an plaintiffs' executive committee member in a substantial number of class actions, shareholder derivative, securities, and other complex cases both in Tennessee courts and federal courts throughout the nation. The firm's efforts have produced significant monetary recovery and/or benefits for plaintiffs from many jurisdictions. While the firm has also defended numerous such actions, the following is a list of notable complex litigation cases that the firm is currently prosecuting, or has prosecuted to a successful conclusion:

CONSUMER PROTECTION ACTIONS

- In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2672 CRB (N.D. Cal.) (J. Breyer). The Firm serves on the Plaintiffs' Steering Committee in a coordinated action consisting of nationwide-cases of consumer and car dealerships alleging that Volkswagen AG and Volkswagen Group of America, and other defendants illegally installed so-called "defeat devices" in their vehicles which allowed the cars to pass emissions testing but enabled them to emit nearly forty-times the allowable pollution during normal driving conditions. In October, 2016, the court granted final approval to a settlement fund worth over $10 billion to consumers with 2.0 liter diesel engines, and in February, 2017, the court preliminarily approved a $1.2 billion settlement for consumers with 3.0 liter diesel engines, and a $357 billion settlement with co-defendant Bosch.

- Davis Neurology, P.A. v. Dental Equities LLC, d/b/a Peer United et al., Case No. 4:16-cv-00371-BSM (E.D. Ark.) (J. Miller). The Firm serves as lead counsel in this nationwide class action brought under the Telephone Consumer Protection Act (TCPA) regarding the sending of illegal junk facsimiles to individuals and business entities. Court finally approved a $1.525 million class-wide settlement.

- Heilman et al. v. Perfection Corporation, et al., Civ. No. 99-0679-CD-W-6 (W.D. Missouri). The firm served on Executive Committee in a nation-wide consumer class action composed of all owners or purchasers of a hot water heater manufactured by defendants with a defective dip tube. Settlement reached involved 100% recovery of damages for a possible 14.2 million hot water heaters and any other property damages caused by a defective hot water heater.

- Cox v. Shell Oil et al., Civ. No. 18844 (Weakley Chancery, Tennessee)(Judge Malon). Intervened in consumer class action composed of all persons throughout the United States, who owned or purchased polybutylene piping systems used in residential constructions or mobile homes that were defective. A global settlement was reached that resolved two competing lawsuits that was valued at $1 billion.

- Davidson v. Bridgestone/Firestone, Inc and Ford Motor Co No. 00-C2298 (Davidson Circuit, Tennessee) (Soloman/Brothers). Lead counsel in a consumer action filed on behalf of a nationwide class of consumers against Bridgestone/Firestone, Inc and Ford Motor Co. that was certified as a nationwide class action concerning defective tires. Settlement was reached in conjunction with a companion case in Texas. Settlement was valued at $34.4 million.

MASS TORT ACTIONS

- In re: New England Compounding Pharmacy Product Liability Action, 1:13-md-02419 (D. Mass) (J. Zobel). Serving on the Plaintiffs' Steering Committee, Mr. Gerard Stranch represents hundreds of individuals injured as a result of exposure to tainted pharmaceuticals manufactured at New England Compounding Pharmacy in Framingham, Massachusetts. This litigation stems from the 2012 nationwide outbreak of fungal meningitis that, according to the Center for Disease Control, injured over 750 people nationwide and led to over 60 deaths. Mr. Stranch also serves as lead Tennessee Plaintiffs' Counsel in this case. Over 100 Tennesseans were injured as a result of the catastrophe and 17 Tennesseans lost their lives. Following NECC's bankruptcy, Mr. Stranch was instrumental in guiding settlement of claims against the bankrupt estate that resulted in the creation of a $210 million tort trust. The litigation then turned to litigating the remaining claims against the doctors, clinics, and other healthcare providers that exposed their patients to tainted pharmaceuticals from NECC. The Court determined the first bellwether trials were to be against Tennessee-based defendants, but claims against these Tennessee-based defendants settled just prior to the first bellwether trial. The firm continues to be instrumental in guiding the remaining cases against doctors, clinics, and healthcare providers through the bellwether trial process.

ERISA AND RELATED CASES (401K, ESOP, TRUST LAW)

- Deschamps v. Bridgestone Americas, Inc. (M.D. Tenn.) (Sharp). Successfully recovered promised pension benefits for long-time Bridgestone employee via summary judgment, which was upheld by the Sixth Circuit Court of Appeals. Both courts published their opinions.

- Ewing et al. v. Neuhoff, et al. (Law and Equity Court, Montgomery County, Tennessee) (Judge Boles). Lead counsel in a class action that resulted in a successful jury verdict against directors of Frosty Morn, Inc. for unlawful activities in running the corporation that directly impacted employee benefit plans. Employees received 100% of their losses.

- In re Providian Financial Corp. ERISA Litigation, No. C 01-5027 (N.D. C.A.) (Breyer). Co-lead counsel in a 401k/ESOP class action suit brought on behalf of the pension plan against fiduciaries of Providian Financial Corp. for violation of ERISA duties. Settlement provided $8.6 million cash payment to the Plan for participants, lifted company stock sales restrictions in the Plan valued between $3.66 million and $5.85 million, and allowed Plan to recover in a parallel securities action.

- In re Montana Power ERISA Litigation, No. 4:02-0099 (D. Mont.) (Haddon). Co-lead counsel in a 401k/ESOP class action suit brought on behalf of pension plan participants against fiduciaries of Montana Power, Touch America and Northwestern Energy and against the Trustee, Northern Trust, for violation of duties owed under ERISA. Settlement was reached that provided a minimum recovery of $4.9 million plus access to additional monies held by others.

- In re Nortel Networks Corp. "ERISA" Litigation, No. 3:03-MD-1537 (M.D. Tenn.) (Nixon). Co-lead counsel in a 401k/ESOP class action suit brought on behalf of pension plan participants against fiduciaries of Nortel Network Corp. for violation of duties owed under ERISA. Court approved a settlement that provided a minimum recovery of $21.5 Million plus access to additional monies held by others.

- In re: Qwest Savings and Investment Plan ERISA Litigation, No. 02-RB-464, (D. Colo.) (Blackburn). Co-lead counsel in a 401k/ESOP class action suit brought on behalf of pension plan participants against fiduciaries at Qwest Communications and the Trustee, Bankers Trust/Deutsche Bank, for violation of duties owed under ERISA. A settlement was reached which provided a $33 million cash payment from Qwest Communications to the Plan for participants, a $4.5 million cash payment from Bankers Trust/Deutsche Bank to the Plan for participants, a $20 million guarantee from Qwest Communications from a parallel securities action with the opportunity of more cash from the parallel securities action, and an undetermined amount of cash from a distribution through the U.S. Securities and Exchange Commission Fair Fund established pursuant to Section 308 of the Sarbanes-Oxley Act of 2002, 15 U.S.C. §§7201 *et seq*.

- In re Global Crossing Ltd. ERISA Litigation, No. 02 Civ. 7453 (S.D. N.Y.) (Lynch). One of several counsel in a 401k/ESOP class action suit brought on behalf of pension plan participants against fiduciaries at Global Crossing for violation of duties owed under ERISA. Settlement reached that provided a $79 million cash payment to the Plan for participants and allowed Plan to recover in parallel securities action.

- In re Xcel Energy, Inc. ERISA Litigation Civ. 02-2677 (D. Minn.) (Doty). Co-lead counsel in a 401k/ESOP class action suit brought on behalf of the pension plan against fiduciaries of Providian Financial Corp. for violation of duties owed under ERISA. Settlement reached that provided an $8.6 million cash payment to the Plan for participants, lifted stock restrictions in the Plan with a value between $38 million and $94 million, and allowed the Plan to recover in parallel securities action.

ANTITRUST CASES

- Dahl v. Bain Capital Partners, LLC, No. 07-cv-1238 (D. Mass) (J. Young). The Firm served on the Executive Committee in this Federal antitrust case challenging bid rigging and market allocation in the private equity/leveraged-buyout industry. The parties reached a $590.5 million settlement approximately two months before trial, and the Court finally approved this settlement in 2015.

- Plumbers & Pipefitters Local 572 Health & Welfare Fund et al. v. Bristol-Myers Squibb Co., No. 00-C-2524, (Davidson Circuit, Tennessee) (Judge Shipley). Lead counsel in action against Bristol-Myers alleging violations of the Tennessee Consumer Protection Act and the Tennessee Trades Practice Act and other theories as a result of anti-competitive, unfair and deceptive acts and practices regarding Bristol-Myers' marketing and selling of the drug Taxol. A global settlement was reached in conjunction with a multi-state indirect companion case in the District of Columbia.

- In re: Columbia/HCA Healthcare Corporation Billing Practices Litigation, No. 3-98-MDL-1227 (M. D. Tenn.) (Higgins). The firm served as liaison counsel in a multi-district litigation brought on behalf of all third-party payers against Columbia Health Care Corporation/HCA Healthcare Corporation alleging over-billing for services. Settlement was reached on a cash payment, modifications in billing

documents and admission practices.

- Sherwood et al. v. Microsoft Corporation, No. 99-C-3562 (Davidson Circuit, Tennessee) (Judge Kurtz). Lead counsel in a consumer and indirect purchaser Tennessee class action against Microsoft Corporation alleging violation of the Tennessee Consumer Protection Act and the Tennessee Trades Act. Settlement was reached that was valued at $64 million.

- Lankford v. Dow Chemical et al., No. 04-1517 (Davidson Circuit, Tennessee) (Judge Shipley). Lead counsel in a consumer and indirect purchaser class action filed on behalf of Tennessee purchasers of products containing neoprene against Dow Chemical Company, E.I. du Pont de Nemours and DuPont Dow Elastomers LLC alleging violation of the Tennessee Consumer Protection Act and the Tennessee Trades Act. A multi-state settlement was reached that was valued at $4.2 million.

- In re: Pharmaceutical Industry Average Wholeseale Price Litig., MDL No. 1456, No. 01-cv-12257-PBS (D. Mass). Counsel in a consolidated nationwide class action against pharmaceutical manufacturers, alleging that defendants published fictional Average Wholesale Prices which artificially inflated the prescription drug prices charged to the Firm's clients and other third-party payors throughout the nation. The case was ultimately settled with various defendants for approximately $350 million.

- In re: Wellbutrin XL Antitrust Litigation, No. 08-2433 (E.D. Penn.) (Judge McLaughlin). Branstetter, Stranch & Jennings serves as Co-Lead counsel in an antitrust class action against pharmaceutical companies GlaxoSmithkline and Biovail on behalf of third-party payors alleging that defendants violated Tennessee, California, Florida, Wisconsin, and Nevada laws by colluding to illegally suppress a cheaper generic form of the blockbuster drug Wellbutrin XL from reaching the market. Through the efforts of the Firm and other co-lead counsel, plaintiffs were able to achieve certification of a class of indirect purchasers. A Settlement was reached with Biovail and the litigation continues against GSK.

- In re: Prograf Antitrust Litigation, No. 11621 (D. Mass) (J. Zobel). Serving in the role of Co-Lead Counsel, Branstetter, Stranch & Jennings represents a putative class of indirect purchaser plaintiffs in a nationwide antitrust action against Astellas Pharma, Inc., alleging that defendant illegally delayed entry of generic Prograf into the marketplace by filing a sham Citizen Petition with the Food and Drug Administration. Achieved partial class certification and withstood motions for summary judgment. The Court granted final approval in November, 2016 to a class-wide settlement award of $13.25 million.

- In re: Effexor Antitrust Litigation, No. 3:11-cv-5661 (D.N.J.) (J. Pisano). The Firm's client serves on the Executive Committee overseeing this end payor antitrust class action against defendants Wyeth Pharmaceuticals, manufacturer of antidepressant medication Effexor XR, and Teva Pharmaceuticals. This lawsuit alleges Defendant Wyeth unlawfully procured the patents underling Effexor XR, filed sham litigation against generic competitors, and then entered into anti-competitive settlement agreement with Teva in order to delay the arrival of generic forms of Effexor XR, causing plaintiffs to pay supracompetitive prices for Effexor XR, when they could have paid for far cheaper generics.

- In re: Metroprolol Succinate End-Payor Antitrust Litigation, No. 06-71 (GMS) (D. Del.) (Judge Sleet). Counsel in an antitrust class action on behalf of end-payors against manufacturers of the brand-name drug Toprol XL. The case was resolved through a settlement totaling $11 million.

- In re: Skelaxin (Metaxalone) Antitrust Litigation, No. 1:12-cv-194 (E.D. Tenn.) (J. Collier). The Firm was appointed Lead Counsel in an antitrust class action on behalf of end-payors regarding monopoly

practices which prevented the sale of generic Skelaxin, a muscle-relaxant prescription drug. The case against defendant Mutual Pharmaceuticals, Inc. was settled on a class basis for a sum total of $9 million, and has been finally approved. The lawsuit against defendant King Pharmaceuticals, Inc. was settled on a non-class basis on behalf of the named plaintiffs.

- Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company et al. (Doryx Indirect Purchaser Antitrust Action), No. 2:12-cv-03824 (E.D. Penn.) (J. Diamond). The Firm served as counsel in an antitrust class action on behalf of indirect purchasers regarding antitrust conduct committed by the manufacturer of brand drug Doryx. The case was settled on a class basis for $8 million.

SECURITIES AND SHAREHOLDER DERIVATIVE CASES

- In re: Omnivision Technologies, Inc. Securities Litigation, Civil No. 5:11-cv-05235 (N.D. Cal.). Co-Lead counsel in securities litigation alleging material misstatements in communications with investors related to Omnivision's supplier contract with Apple, Inc. The case was ultimately settled on a class basis for $12.5 million, and was formally approved in 2015.

- Arlow, et al., v. Miller Energy Resources, Inc., Civil No. 3:11-CV-386 (E.D. Tenn.) (Judge Varland). Liason counsel in securities litigation alleging fraudulent accounting practices that overvalued assets and inflated stock prices. The case was ultimately settled and approved for $2.9 million.

- In re: Regions Morgan Keegan Securities, Derivative & ERISA Litigation, Closed-End Fund Litigation, Civil No. 07-cv-02830 (W.D. Tenn.) (Judge Mays). Liason counsel for lead plaintiffs in securities litigation alleging fraud in the marketing and selling of corporate bonds and preferred stocks by failing to disclose investments in asset backed securities and mortgage-backed securities. The parties settled the case for $62 million.

- In re: King Pharmaceuticals, Inc. Derivative Litigation, Civil. No. B0019077 (M) (Sullivan Chancery, Tennessee) (Judge McLellan). Lead counsel in a shareholder derivative action against the Board of Directors and certain officers at King Pharmaceuticals alleging various breaches of fiduciary duty, abuse of control, unjust enrichment and waste of corporate assets. The parties settled the case for substantial and material revisions to the Company's corporate governance practices.

- Carolinas Electrical Workers Retirement Fund v. Kramer et al., Civ. No. H-01-1176 (S. D. TX). Co-lead counsel in a shareholder derivative suit brought on behalf of American General Corporation alleging that the then directors of the corporation breached its then fiduciary duties in connection with a purposed merger with Prudential Insurance Company. The case was successfully resolved when the merger was cancelled. American General later merged with AIG.

- Holle v. Prison Realty, Inc., Case No. 99-1719-III, (Davidson County Chancery) (Chancellor Lyle). Shareholder class action on behalf of shareholders of Prison Realty Trust against its board of directors for breaches of fiduciary duties and self-dealings. Settlement was reached in conjunction with a global settlement of a securities case in federal court.

- Brand et al. v. Welch et al., Case No. 00C-3066 (Davidson County Circuit) (Judge Gayden). Counsel in a shareholder action alleging breaches of fiduciary duties in connection with the merger between

Quorum Corporation and Triad. A settlement was reached in which shareholders received greater value for their stock than offered in the original merger.

- Dollar General Derivative Litigation (Dixon et al v. Turner, et al), Case No. 01C-1322 (Davidson County Circuit, Tennessee) (Judge Shipley). Lead counsel in a shareholder derivative action against directors of Dollar General Corporation alleging breaches of fiduciary duties, waste of corporate assets, unjust enrichment, and gross mismanagement. Settlement of the case included $31.5 million cash payment to the corporation and significant corporate governance changes. The settlement is the largest derivative settlement in Tennessee history.

- Benkler v. Miller et al., Case No. 00C-2630 (Davidson County, Tennessee) (Judge Soloman). Counsel in a shareholder derivative action against directors of Sirrom Capital Corporation alleging breaches of fiduciary duties in connection with merger between Sirrom Capital Corporation and Finova Financial. A global settlement was reached in conjunction with securities cases that were filed or transferred to Arizona.

- Central Laborers' Pension Fund v. Chellegren, Civ. No. 02-CI-02174 (Kenton Circuit, Kentucky). Settlement in a shareholder derivative action against the Board of Directors and certain officers at Ashland, Inc. relating to accounting practices which harmed the company. The settlement resulted with a cash payment and significant corporate governance changes.

- In re: Clayton Homes Derivative Litigation, Case No. E-19723 (Blount Circuit, Tennessee) (Young). Lead counsel in a shareholder derivative action originally against the Board of Directors and certain officers at Clayton Homes for breaches of fiduciary duties and corporate waste. During the litigation, Clayton Homes was purchased by Berkshire Hathaway. Settlement was reached with shareholders obtaining additional money for their shares of Clayton Homes in the purchase

- National Commerce Financial Shareholder Litigation, CT-002672-04 (Shelby Circuit, Tennessee). Counsel in a shareholder action contesting the value of National Commerce stock in its merger with SunTrust. Settlement was reached.

- Accredo Health Derivative Ligation, Case No. CT-002203-03 (Shelby Circuit, Tennessee) (Judge Fields). Co-lead counsel in a shareholder derivative action against the Board of Directors and certain officers at Accredo Health alleging various breaches of fiduciary duty, abuse of control, and waste of corporate assets. Accredo merged during the litigation. Settlement was reached.

- Provident Financial Derivative Litigation, No. C-1-08-168 (S.D. Ohio). Counsel in a shareholder derivative action against the Board of Directors and certain officers at Provident Financial alleging various breaches of fiduciary duty, abuse of control, and waste of corporate assets. Settlement was reached.

- In re: Worldcom Securities Litigation, No. 03-27211 (Davidson Chancery, Tennessee) (Judge McCoy). Co-lead counsel in a securities action by the Tennessee Consolidated Retirement System against the banks that underwrote Worldcom bonds during a period of time in which Worldcom was manipulating its accounting. Settlement was reached that provided a recovery to the retirement system of $7 million.

- In re: Unumprovident Derivative Litigation, No. 1:02CV-386 (E.D. Tenn.) (Judge Collier). Co-lead counsel in a shareholder derivative action against the Board of Directors and certain officers of

UnumProvident alleging various breaches of fiduciary duty, abuse of control, and waste of corporate assets. A settlement of this case that involves a payment of $30 million to the company plus significant corporate governance changes has been approved by the court.

- In re: AFC Enterprises Derivative Litigation, Civil No. 1:03-CV-2095TWT (N.D. Ga.) (Thrasher). One of three lead counsel in a shareholder derivative action against the Board of Directors and certain officers at AFC Enterprises alleging various breaches of fiduciary duty, abuse of control, and waste of corporate assets resulting from improper accounting practices and insider trading. Settlement was reached which provided for corporate governance changes.

- In re: Dynegy, Inc., Derivative Litigation, Civil No. 2002-25250 (Harris County, Texas) (Jamison). Co-lead counsel in a shareholder derivative action against the Board of Directors and certain officers at Dynegy, Inc. alleging various breaches of fiduciary duty, abuse of control, and waste of corporate assets. Settlement was reached with significant corporate changes and resignation of key officeholders.

- In re: Direct General Corporation Derivative Litigation, Civil No. 3:05-CV-00158 (M.D. Tenn.)(Campbell). Co-lead counsel in litigation against the Board of Directors and certain officers of Direct General Corporation alleging various breaches of fiduciary duty resulting from financial manipulations, insider selling, and misconduct in connection with a proposed private-equity sale of the company. The parties ultimately reached a settlement for additional material disclosures in the proxy materials and a substantial payment to shareholders if the company is sold by the acquiring entity for more than the merger consideration within nine months of the consummation of the private-equity sale.

- In re: Caremark RX, Inc. Stock Option Litigation, Civil No. 06-C-1329 (Davidson County, Tennessee). Co-lead counsel in litigation against the board of directors of Caremark RX, Inc. alleging breach of fiduciary duties resulting from the Board's attempt to merge the company with CVS Corporation, Inc. and extinguish their liability for improperly backdating stock option grants to certain Board members and high-ranking officers at the Company. A settlement was reached that provided for corporate governance reforms concerning the granting of options, additional disclosures to voting shareholders prior to the merger vote, and recognition that the case indirectly resulted in additional compensation to shareholders.

- In re: HCA Inc. Shareholder Litigation, Civil No. 3:05-CV-0968 (Middle District of Tennessee)(J. Haynes). Co-lead counsel representing shareholders of Hospital Corporation of America (HCA) Inc., alleging that the company's board of directors breached their fiduciary duties by approving a private-equity buyout of the company at an unfair price via an unfair process. A settlement was reached with provided for enhanced appraisal rights for shareholders, reduced termination fee, a "majority of the minority" provision, and additional material disclosures in the proxy materials.

- Fisk v. Alfa Corporation, Civil No. 03-CV-2007-900485.00 (Montgomery County, Alabama). Co-lead counsel representing shareholders of Alfa Corporation, alleging that the company's board of directors breached their fiduciary duties by engaging in self-dealing and approving a sale of the company to private interests for grossly inadequate consideration. A settlement was reached that resulted in an approximate additional $161 million being paid to the shareholder class.

WAGE & HOUR AND WARN ACT CLAIMS

- Drummond et al. v. C.E.C. Electrical Contractors, Inc., 98-1811-III (Davidson Chancery, Tennessee) (Chancellor Lyle). Lead counsel in a class action settlement by employees against their employer for wages and benefits due from a school construction contract between their employer and the Metropolitan-Davidson County Board of Education. Settlement reached in which employees received 100% of their wages and benefits.

- Kizer v. Summit Partners, Case No. 1:1-CV-38 (E.D. Tenn.) Counsel in class actions on behalf of employees of a closed Summit Partners facility located in Chattanooga, Tennessee in 2011. Case was successfully settled for $275,000.

- Owens v. Carrier Corp., Case No. 2:08-2331-SHM P (W.D. Tenn.) Lead Counsel in class action on behalf of former Carrier Corp. employees at plant in Collierville, Tennessee that closed in 2008. Case was successfully settled on behalf of former employees for $2.1 million after Lead Counsel successfully obtained class certification over plaintiffs' WARN Act claims.

- In re Sofa Express Inc., Case No. 07-924 (Bank. M.D. Tenn.) Lead counsel in class action on behalf of former Sofa Express, Inc. employees at a distribution center and headquarters in Groveport, Ohio in 2007. Case was successfully settled on behalf of former employees for $398,000.

- Robertson et. al v. DSE Inc., Case No. 8:13-cv-1931-T-AEP (M.D. Fla.). Lead counsel in class action on behalf of former DSE Inc. employees at manufacturing facilities in in Florida and South Carolina. Case successfully settled on behalf of former employees for over $1 million.

EXHIBIT B

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

Firm Name: BRANSTETTER STRANCH & JENNINGS **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
J. Gerard Stranch, IV (P)						6.80		0.20	0.70						7.70	$770.00	$5,929.00
Joey Leniski (P)						7.00									7.00	$750.00	$5,250.00
Anthony Orlandi (A)						6.60									6.60	$675.00	$4,455.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**20.40**	**0.00**	**0.20**	**0.70**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**21.30**		**$15,634.00**
NON-ATTORNEYS																	
Casey, Lisa (PL)									0.20						0.20	$190.00	$38.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**		**$38.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**20.40**	**0.00**	**0.20**	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**21.50**		**$15,672.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BRANSTETTER, STRANCH & JENNINGS, PLLC

ATTORNEYS	DATE RANGE	HOURLY RATE
James G. Stranch, III (P)	6/1/2013 – 12/31/2013	$725.00
	1/1/2017 - 2/28/17	$905.00
J. Gerard Stranch, IV (P)	6/1/2013- 12/1/2013	$625.00
	1/1/2016 – 12/31/16	$700.00
	1/1/2017 - 2/28/2017	$770.00
Michael Stewart (P)	1/1/2017 – 2/28/2017	$770.00
Joey Leniski (P)	1/1/2016 – 12/31/16	$700.00
	1/1/2017 - 2/28/17	$750.00
Benjamin Gastel (A)	6/1/2013 – 12/31/13	$375.00
	1/1/2017 – 2/28/2017	$675.00
Anthony Orlandi (A)	1/1/2016 – 12/31/2017	$625.00
	1/1/2016 - 2/28/2017	$675.00
Seamus Kelly (A)	1/1/2015 – 12/31/2015	$575.00
	1/1/2017 – 2/28/2017	$675.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Paralegal General (PL)	6/1/2013 – 12/1/2014	$100.00
	1/1/2015 – 12/31/2015	$150.00
	1/1/2017- 12/31/2017	$190.00
Mariah Young (PL)	1/1/2016 – 12/31/2017	$175.00
	1/1/2017 - 2/28/2017	$190.00
Megan Sampson (PL)	1/1/2016 – 2/28/2017	$190.00
Amanda Winski (PL)	1/1/2016 – 12/31/2017	$175.00
	1/1/2017 - 2/28/2017	$190.00

EXHIBIT D

(REDACTED)

Employee	Date	Time	RateBilled	Amount	Cat.	Detailed Description
Casey, Lisa (Paralegal)	08/14/2013	0.2	$100.00	$20.00	9	Received and processed Proposed Order re [268] Letter Brief, Proposed Order Regarding Defendants' Motions Challenging Consolidated Amended Complaints by Direct Purchaser Plaintiffs, Indirect Purchaser Plaintiffs.
Stranch, Gerard (Partner)	01/27/2016	0.2	$700.00	$140.00	8	Emails with Krystal regarding [redacted] discovery and deposition
Stranch, Gerard (Partner)	02/08/2016	0.5	$700.00	$350.00	9	Review email from Krysta and forward to [redacted]
Stranch, Gerard (Partner)	02/09/2016	0.2	$700.00	$140.00	6	[redacted], receive response and provide deposition dates to Krysta
Stranch, Gerard (Partner)	02/12/2016	0.8	$700.00	$560.00	6	Multiple emails with Krysta Pachman and [redacted] regarding Interrogatories and documents
Stranch, Gerard (Partner)	02/13/2016	0.2	$700.00	$140.00	6	Emails regarding [redacted]
Stranch, Gerard (Partner)	02/26/2016	0.3	$700.00	$210.00	6	Emails with Pachman re [redacted] production of documents
Stranch, Gerard (Partner)	03/11/2016	0.5	$700.00	$350.00	6	Review email with summary of 3/10 court hearing sent by Krysta Pachman regarding court order directing amendment to prior responses to discovery; Review discovery and verification pages and forward same to client for review
Orlandi, Anthony (Associate)	03/15/2016	0.8	$625.00	$500.00	6	Prepare verifications in consultant with [redacted]
Stranch, Gerard (Partner)	03/15/2016	0.3	$700.00	$210.00	6	Reviewed responses with [redacted]t and forwarded signed verifications to Pachman and group
Stranch, Gerard (Partner)	03/17/2016	0.2	$700.00	$140.00	6	Schedule deposition prep for [redacted]
Stranch, Gerard (Partner)	03/21/2016	0.3	$700.00	$210.00	6	TC with [redacted]
Stranch, Gerard (Partner)	03/22/2016	0.4	$700.00	$280.00	6	Review supplemental discovery requests to [redacted], call with [redacted]
Orlandi, Anthony (Associate)	03/23/2016	0.5	$625.00	$313.00	6	Participate in call with lead counsel and client regarding electronically stored information (.5)
Orlandi, Anthony (Associate)	3/23/2016	1.5	$625.00	$938.00	6	communications with Mr. Stranch and [redacted] regarding [redacted] (1.5)
Orlandi, Anthony (Associate)	03/24/2016	2.5	$625.00	$1,562.50	6	Search for [redacted] 1.0); discussion with [redacted] (.3); discussion with Mr. Lambrinos regarding [redacted] (.2); discussion with [redacted] (1.0);
Stranch, Gerard (Partner)	03/24/2016	0.7	$700.00	$490.00	6	Discussions with Pachman regarding [redacted] supplemental interrogatory responses; Multiple emails re document production

Orlandi, Anthony (Associate)	03/30/2016	1.1	$625.00	$687.50	6	discussion with Mr. Gamble and with client regarding photos; email lead counsel regarding [redacted]
Stranch, Gerard (Partner)	03/30/2016	0.3	$700.00	$210.00	6	Various emails regarding scheduling of deposition prep
Stranch, Gerard (Partner)	03/31/2016	1	$700.00	$700.00	6	Meet with clients and Ms. Pachman, attend deposition prep. session
Stranch, Gerard (Partner)	04/04/2016	0.2	$700.00	$140.00	6	Emails re: upcoming deposition
Stranch, Gerard (Partner)	04/05/2016	0.2	$700.00	$140.00	6	Emails with [redacted] re depo prep
Leniski, Joey (Partner)	04/06/2016	2	$700.00	$1,400.00	6	prep session w/[redacted] for deposition
Stranch, Gerard (Partner)	04/07/2016	0.4	$700.00	$280.00	6	Review rought ASCII re [redacted] deposition and emails re same
Leniski, Joey (Partner)	04/07/2016	5	$700.00	$3,500.00	6	prep and conduct deposition of [redacted]; post-depo debrief and mtg w/Krista, GS
Stranch, Gerard (Partner)	04/12/2016	0.2	$700.00	$140.00	9	Emails re depo and verification sheet
Stranch, Gerard (Partner)	04/19/2016	0.7	$700.00	$490.00	6	Review final [redacted] transcript; Review verification and emails re same
Orlandi, Anthony (Associate)	04/21/2016	0.2	$625.00	$125.00	6	Draft revised interrogatories and send to plaintiffs' steering committee
Stranch, Gerard (Partner)	04/21/2016	0.1	$700.00	$70.00	6	Emails with co-counsel regarding verificaton document
TOTAL		21.5		$14,436.00		

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
BRANSTETTER, STANCH & JENNINGS, PLLC
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	69.90
Supplies	
Telephone/Telecopier	
Travel	6,997.47
Miscellaneous	
TOTAL:	$7,067.37

EXHIBIT 14

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JOSEPH M. BREALL IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BREALL & BREALL, LLP**

I, Joseph M. Breall, declare:

1. I am managing partner of Breall & Breall, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Piya Rojanasathit and as counsel for IPPs throughout the course of this litigation. The background and experience of Breall & Breall, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Breall & Breall, LLP performed the following work: review complaint and amended pleadings, assist lead counsel in responding to written discovery, and preparing and attending oral depositions.

5. A summary of work performed by Breall & Breall, LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Joseph M. Breall in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Breall & Breall, LLP and filed on May 26, 2017. (ECF No. 1813-11. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Breall & Breall, LLP since June 1, 2013 was 35.30, with a corresponding lodestar of $17,285.00 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses Breall & Breall, LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Breall & Breall, LLP expended a total of $350.00 in unreimbursed costs and expenses in connection with the

prosecution of this case. These expenses were incurred on behalf of IPPs by Breall & Breall, LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Breall & Breall, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on March 26, 2019 at San Francisco, California.

/s/ Joseph M. Breall

Joseph M. Breall

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

JOSEPH M. BREALL

Managing Partner at Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118

Tel: (415) 345-0541 Fax: (415) 345-0538
Email: jmbreall@breallaw.com

Joseph M. Breall is a founding partner of BREALL & BREALL, LLP. Mr. Breall has extensive courtroom experience successfully championing his clients' cases from pre-trial hearings through trial verdicts and judgments. Mr. Breall has over twenty years experience in complex civil litigation, including mass torts, class action, real estate/construction defect and catastrophic loss actions. The majority of Mr. Breall's civil practice involves disputes over multi-million dollar claims.

Mr. Breall's case actions and settlements have been featured in articles in the *San Francisco Chronicle*, the *San Francisco Business Times*, the *Ming Pao Daily News*, and *The Recorder* regarding a wide spectrum of subjects such as Anti-SLAPP suits, ADA rights, City planning issues, wrongful Ellis Act evictions, and first Amendments Rights for religious minorities.

Mr. Breall has also spent extensive time working on pro-bono cases, including dog owners' rights to secure an off-leash policy at the Fort Funston National Park; and the right to allow the Falun Gong admittance to the annual San Francisco Chinese New Year Street Fair. Mr. Breall also has represented numerous arts organizations including S.F. Cameraworks.

Mr. Breall is a graduate of University of California Berkeley with a Bachelor's degree in History and Art History and is a graduate of University of California Hastings College of the Law. He is also a Black belt in Ensin Karate.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
BREALL & BREALL, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	$350.00
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$350.00

EXHIBIT 15

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JOSEPH M. BREALL IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF BREALL & BREALL, LLP**

I, Joseph M. Breall, declare:

1. I am managing partner of Breall & Breall, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Piya Rojanasathit and as counsel for IPPs throughout the course of this litigation. The background and experience of Breall & Breall, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Breall & Breall, LLP performed the following work: review complaint and amended pleadings, assist lead counsel in responding to written discovery, and preparing and attending oral depositions.

5. Attached hereto as **Exhibit B** is a billing summary of Breall & Breall, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Breall & Breall, LLP during this period of time was 35.30, with a corresponding lodestar based on current rates of $17,285.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Breall & Breall, LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Breall & Breall, LLP has incurred during the course of this litigation. Breall & Breall, LLP expended a total of $350.00 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Breall & Breall, LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 18, 2017 at San Francisco, California.

/s/ Joseph M. Breall

Joseph M. Breall

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

JOSEPH M. BREALL

Managing Partner at Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118

Tel: (415) 345-0541 Fax: (415) 345-0538
Email: jmbreall@breallaw.com

Joseph M. Breall is a founding partner of BREALL & BREALL, LLP. Mr. Breall has extensive courtroom experience successfully championing his clients' cases from pre-trial hearings through trial verdicts and judgments. Mr. Breall has over twenty years experience in complex civil litigation, including mass torts, class action, real estate/construction defect and catastrophic loss actions. The majority of Mr. Breall's civil practice involves disputes over multi-million dollar claims.

Mr. Breall's case actions and settlements have been featured in articles in the *San Francisco Chronicle*, the *San Francisco Business Times*, the *Ming Pao Daily News*, and *The Recorder* regarding a wide spectrum of subjects such as Anti-SLAPP suits, ADA rights, City planning issues, wrongful Ellis Act evictions, and first Amendments Rights for religious minorities.

Mr. Breall has also spent extensive time working on pro-bono cases, including dog owners' rights to secure an off-leash policy at the Fort Funston National Park; and the right to allow the Falun Gong admittance to the annual San Francisco Chinese New Year Street Fair. Mr. Breall also has represented numerous arts organizations including S.F. Cameraworks.

Mr. Breall is a graduate of University of California Berkeley with a Bachelor's degree in History and Art History and is a graduate of University of California Hastings College of the Law. He is also a Black belt in Ensin Karate.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- MONTHLY

Firm Name: Breall & Breall LLP

Reporting Period: 06/24/2013 - 01/12/2017

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Joseph M Breall (P)							5.70				1.30				7.00	$650.00	$4,550.00	7.00	$4,550.00
Jill A Diamond (A)							2.10		3.50		2.80				8.40	$450.00	$3,780.00	8.40	$3,780.00
Christina Nguyen (A)					6.40		6.90		1.90		4.20	0.50			19.90	$450.00	$8,955.00	19.90	$8,955.00
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
SUB-TOTAL	0.00	0.00	0.00	0.00	6.40	0.00	14.70	0.00	5.40	0.00	8.30	0.50	0.00	0.00	35.30	$1,550.00	$17,285.00	35.30	$17,285.00
NON-ATTORNEYS																			
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	$0.00	$0.00	0.00	$0.00
GRAND TOTAL:	0.00	0.00	0.00	0.00	6.40	0.00	14.70	0.00	5.40	0.00	8.30	0.50	0.00	0.00	35.30	$1,550.00	$17,285.00	35.30	$17,285.00

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

BREALL & BREALL, LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Joseph M. Breall	June 2013 to February 2017	$650.00
Jill L. Diamond	June 2013 to May 2015	$450.00
Christina Nguyen	April 2015 to February 2017	$450.00
–		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

January 05, 2017
Invoice No: 14074

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
12/19/2016	JMB	7	[redacted] (0.20), (0.10)	0.30 650.00/hr	195.00
12/20/2016	JMB	7	[redacted]	0.30 650.00/hr	195.00
12/22/2016	JMB	7	[redacted]	0.30 650.00/hr	195.00
12/22/2016	CN	12	[redacted]	0.10 450.00/hr	45.00
			For professional services rendered	1.00	630.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	0.10	450.00	$45.00
Joseph M. Breall (JMB)	0.90	650.00	$585.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

February 01, 2017
Invoice No: 14104

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
1/4/2017	JMB	7	[redacted]	0.20 650.00/hr	130.00
1/6/2017	CN	12	[redacted]	0.20 450.00/hr	90.00
1/9/2017	CN	12	[redacted]	0.10 450.00/hr	45.00
1/12/2017	CN	7	[redacted]	0.10 450.00/hr	45.00
1/12/2017	CN	12	[redacted]	0.10 450.00/hr	45.00
			For professional services rendered	0.70	355.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	0.50	450.00	$225.00
Joseph M. Breall (JMB)	0.20	650.00	$130.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

March 01, 2016
Invoice No: 13877

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
2/9/2016	JMB	7	Review and analyze email from Krysta regarding discovery, protective order, and litigation hold, forward same to [redacted]	0.30 650.00/hr	195.00
2/11/2016	JMB	7	Review and analyze email from [redacted] regarding discovery, protective order, and litigation hold, forward same to [redacted]	0.30 650.00/hr	195.00
2/25/2016	JMB	7	Review and analyze further email from Krysta regarding discovery, protective order, and litigation hold, forward same to [redacted]	0.30 650.00/hr	195.00
2/26/2016	JMB	7	Review and analyze email from [redacted] regarding availability for deposition, reply to same	0.30 650.00/hr	195.00
2/26/2016	JMB	7	Review and analyze email from [redacted] regarding discovery	0.30 650.00/hr	195.00
2/29/2016	CN	9	Preparation of email to Krysta enclosing executed protective order, litigation hold, confirming discovery responses, and providing [redacted] availability	0.20 450.00/hr	90.00
2/29/2016	CN	9	Review and analyze email from Krysta requesting [redacted] availability for a full day deposition	0.10 450.00/hr	45.00
2/29/2016	CN	9	Preparation of email to [redacted] requesting availability for a full day deposition	0.10 450.00/hr	45.00
2/29/2016	CN	9	Preparation of email to Krysta of Susman Godfrey regarding deposition location	0.10 450.00/hr	45.00
2/29/2016	CN	9	Review and analyze email from Krysta of Susman Godfrey regarding deposition location, reply to same	0.10 450.00/hr	45.00
			For professional services rendered	2.10	$1,245.00

[redacted]

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	0.60	450.00	$270.00
Joseph M. Breall (JMB)	1.50	650.00	$975.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

April 04, 2016
Invoice No: 13883

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
3/7/2016	CN	9	Review and analyze email from Krysta of Susman Godfrey of Susman Godfrey regarding [redacted] availability for deposition, reply to same	0.20 450.00/hr	90.00
3/7/2016	CN	9	Review and analyze email from [redacted] regarding availability for deposition, reply to same	0.20 450.00/hr	90.00
3/8/2016	CN	9	Review and analyze email from Krysta of Susman Godfrey regarding supplemental interrogatories, verification, protective order, and litigation hold; reply to same and forward to [redacted]	0.40 450.00/hr	180.00
3/8/2016	CN	7	Review and analyze email from [redacted] enclosing signed verification and availability for deposition, reply to same	0.20 450.00/hr	90.00
3/8/2016	JMB	7	Review and analyze email from Krysta of Susman Godfrey regarding judge's order to emend responses to defendant's request from production and provide verifications, forward same to [redacted]	0.50 650.00/hr	325.00
3/8/2016	CN	11	Voicemail from Demetrius of Cotchett Pitre & McCarthy regarding judge's order to amend responses to defendant's request for production and provide verifications	0.10 450.00/hr	45.00
3/8/2016	CN	11	Telephone conversation with Demetrius of Cotchett Pitre & McCarthy of Cotchett Pitre & McCarthy regarding judge's order to amend responses to defendant's request for production and provide verifications	0.10 450.00/hr	45.00
3/11/2016	CN	11	Preparation of email to [redacted] regarding search for additional responsive documents and availability for deposition	0.10 450.00/hr	45.00
3/11/2016	CN	11	Review and analyze email from [redacted] regarding search for additional responsive documents and availability for deposition, reply to same	0.10 450.00/hr	45.00

[redacted]

Date	Initials	Code	Description	Hrs/Rate	Amount
3/14/2016	CN	11	Preparation of follow up email to [redacted] regarding review of amended responses to defendant's request for production	0.10 450.00/hr	45.00
3/14/2016	CN	7	Review and analyze email from [redacted] confirming review of amended response to defendant's request for production and providing verification	0.10 450.00/hr	45.00
3/14/2016	CN	11	Preparation of email to Krysta of Susman Godfrey enclosing [redacted] verification, [redacted]	0.30 450.00/hr	135.00
3/14/2016	CN	11	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy regarding amended responses to request for production, reply to same	0.20 450.00/hr	90.00
3/14/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey confirming [redacted] deposition, reply to same	0.20 450.00/hr	90.00
3/16/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding location of [redacted] deposition, reply to same	0.20 450.00/hr	90.00
3/16/2016	CN	11	Preparation of email to [redacted] confirming deposition	0.10 450.00/hr	45.00
3/17/2016	CN	11	Review and analyze email from [redacted] regarding deposition preparation, reply to same	0.20 450.00/hr	90.00
3/17/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding [redacted] deposition preparation	0.10 450.00/hr	45.00
3/17/2016	CN	11	Review and analyze email from Krysta of Susman Godfrey regarding [redacted] deposition preparation	0.10 450.00/hr	45.00
3/17/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding location of [redacted] deposition (0.10), reply to same (0.10)	0.20 450.00/hr	90.00
3/17/2016	CN	11	Preparation of email to [redacted] regarding change of location for deposition	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding [redacted] deposition preparation (0.30), reply to same (0.20)	0.50 450.00/hr	225.00
3/18/2016	CN	7	Review and analyze email further from Krysta of Susman Godfrey regarding [redacted] deposition preparation (0.10), reply to same (0.10)	0.20 450.00/hr	90.00

[redacted]

Date	Initials	Code	Description	Hrs/Rate	Amount
3/18/2016	CN	11	Preparation of email to [redacted] regarding deposition preparation	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from [redacted] regarding deposition preparation, reply to same	0.10 450.00/hr	45.00
3/18/2016	CN	11	Preparation of email to Krysta of Susman Godfrey confirming availability for [redacted] deposition preparation	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding production of responsive documents	0.20 450.00/hr	90.00
3/18/2016	JMB	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding production of responsive documents	0.50 650.00/hr	325.00
3/18/2016	JMB	11	Voicemail from Demetrius of Cotchett Pitre & McCarthy regarding [redacted] production of responsive documents	0.10 650.00/hr	65.00
3/18/2016	JMB	7	Review and analyze letter from Demetrius of Cotchett Pitre & McCarthy regarding indirect purchaser plaintiffs proposed settlement	0.80 650.00/hr	520.00
3/18/2016	JMB	7	Review and analyze indirect purchaser plaintiffs proposed settlement agreement	1.00 650.00/hr	650.00
3/18/2016	CN	7	Review and analyze email from [redacted] to Demetrius of Cotchett Pitre & McCarthy regarding availability for production for responsive documents	0.10 450.00/hr	45.00
3/18/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding availability for production for responsive documents	0.20 450.00/hr	90.00
3/18/2016	JMB	7	Review and analyze further email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding availability for production of responsive documents	0.20 650.00/hr	130.00
3/29/2016	CN	7	Review and analyze email from [redacted] to Demetrius of Cotchett Pitre & McCarthy regarding availability for production of responsive documents	0.10 450.00/hr	45.00
3/29/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy regarding availability for production of responsive documents	0.10 450.00/hr	45.00

[redacted]

Date	Initials	Code	Description	Hrs/Rate	Amount
3/30/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy regarding teleconference for remote production of responsive documents, reply to same	0.20 450.00/hr	90.00
	For professional services rendered			8.30	$4,355.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	5.20	450.00	$2,340.00
Joseph M. Breall (JMB)	3.10	650.00	$2,015.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

May 02, 2016
Invoice No: 13906

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
4/1/2016	JMB	11	Teleconference for remote production of responsive documents.	1.00 650.00/hr	650.00
4/1/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding additional documents	0.20 450.00/hr	90.00
4/1/2016	CN	7	Review and analyze further email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding additional documents	0.20 450.00/hr	90.00
4/1/2016	CN	7	Review and analyze email from Michael to [redacted] regarding documents produced/.	0.20 450.00/hr	90.00
4/4/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep	0.20 450.00/hr	90.00
4/4/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey enclosing defendant's request for production, set two, and responses and objection to same	0.20 450.00/hr	90.00
4/11/2016	CN	7	Review and analyze email from Demetrius of Cotchett Pitre & McCarthy to [redacted] regarding teleconference to gather further responsive documents	0.20 450.00/hr	90.00
4/11/2016	CN	7	Review and analyze email from [redacted] to Demetrius of Cotchett Pitre & McCarthy regarding teleconference to gather further responsive documents	0.10 450.00/hr	45.00
4/11/2016	CN	7	Review and analyze email from Brian Kim to [redacted] regarding teleconference to gather further responsive documents	0.10 450.00/hr	45.00
4/11/2016	CN	7	Review and analyze email from Brian Kim to [redacted] regarding further remote collection	0.20 450.00/hr	90.00
4/13/2016	CN	11	Teleconference for remote production of responsive documents	1.30 450.00/hr	585.00

[redacted]

Date	Initials	Code	Description	Hrs/Rate	Amount
4/14/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding responses to defendant's special roggs, set three	0.20 450.00/hr	90.00
4/14/2016	CN	9	Review and analyze responses to defendant's special roggs, set three	0.20 450.00/hr	90.00
4/18/2016	CN	11	Preparation of verification to responses to defendant's special roggs, set three	0.10 450.00/hr	45.00
4/19/2016	CN	7	Review and analyze email from [redacted] enclosing verification to responses to defendant's special roggs, set three	0.10 450.00/hr	45.00
4/19/2016	CN	11	Preparation of email to [redacted] confirming whether he has received any reimbursements for expenses	0.10 450.00/hr	45.00
4/19/2016	CN	7	Review and analyze email from [redacted] confirming he has not received any reimbursements for expenses, reply to same	0.10 450.00/hr	45.00
4/19/2016	CN	11	Preparation of email to Krysta of Susman Godfrey enclosing verification to responses to special roggs, set three, and confirming that [redacted] has not received any reimbursements for expenses.	0.20 450.00/hr	90.00
4/20/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to same	0.10 450.00/hr	45.00
4/20/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to same	0.10 450.00/hr	45.00
4/20/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding documents to be reviewed during deposition prep, reply to same	0.10 450.00/hr	45.00
4/20/2016	CN	11	Preparation of email to [redacted] enclosing deposition handout and fourth amended complaint for review before deposition prep, and link to discovery reviewed during deposition prep, reply to same	0.20 450.00/hr	90.00
4/25/2016	CN	7	Review and analyze email from [redacted] confirming that he reviewed the deposition handout and fourth amended complaint	0.10 450.00/hr	45.00
4/28/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey confirming deposition preparation, reply to same	0.10 450.00/hr	45.00
4/28/2016	CN	11	Preparation of email to [redacted] confirming deposition preparation	0.10 450.00/hr	45.00

[redacted]

Date	Initials	Code	Description	Hrs/Rate	Amount
4/29/2016	CN	5	Deposition preparation with Krysta of Susman Godfrey and [redacted]	0.10 450.00/hr	45.00
			For professional services rendered	5.80	$2,810.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	4.40	450.00	$2,160.00
Joseph M. Breall (JMB)	1.00	650.00	$650.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

June 01, 2016
Invoice No: 13925

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
5/2/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding further deposition preparation	0.10 450.00/hr	45.00
5/2/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey enclosing [redacted] deposition notice	0.20 450.00/hr	90.00
5/2/2016	CN	11	Preparation of email to Krysta of Susman Godfrey regarding [redacted] deposition	0.10 450.00/hr	45.00
5/2/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding [redacted] deposition, reply to same	0.20 450.00/hr	90.00
5/2/2016	CN	11	Preparation of email to Krysta of Susman Godfrey and [redacted] regarding further deposition preparation	0.20 450.00/hr	90.00
5/2/2016	CN	9	Review and analyze second amended responses to first set of special interrogatories	0.30 450.00/hr	135.00
5/4/2016	CN	5	Deposition preparation with Krysta of Susman Godfrey and [redacted]	1.00 450.00/hr	450.00
5/4/2016	CN	5	Deposition of [redacted]	5.30 450.00/hr	2385.00
5/16/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey to [redacted] enclosing deposition transcript for review	0.20 450.00/hr	90.00
5/18/2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding additional photos in our files, reply to same	0.20 450.00/hr	90.00
			For professional services rendered	7.80	$3,510.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	7.80	450.00	$3,510.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

July 01, 2016
Invoice No: 13951

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
6/1//2016	CN	7	Review and analyze email from Krysta of Susman Godfrey regarding [redacted] errata for his deposition	0.10 450.00/hr	45.00
6/6/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding [redacted] errata for his deposition	0.10 450.00/hr	45.00
6/7/2016	CN	7	Review and analyze email from [redacted] regarding errata for his deposition	0.10 450.00/hr	45.00
6/15/2016	CN	7	Review and analyze further email from Krysta of Susman Godfrey regarding [redacted] errata for his deposition	0.10 450.00/hr	45.00
6/16/2016	CN	7	Review and analyze email from [redacted] to Krysta of Susman Godfrey regarding errata for his deposition	0.10 450.00/hr	45.00
6/24/2016	CN	7	Review and analyze email from lead counsel's office regarding service tag (0.10), forward same to [redacted] (0.10)	0.20 450.00/hr	90.00
6/24/2016	CN	7	Review and analyze email from [redacted] to lead counsel's office regarding service tag	0.10 450.00/hr	45.00
6/24/2016	CN	7	Review and analyze email from lead counsel's office to [redacted] regarding service tag	0.10 450.00/hr	45.00
			For professional services rendered	0.90	$405.00

Timekeeper Summary

Name	Hours	Rate	Amount
Christina Nguyen	0.90	450.00	$405.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

March 01, 2015
Invoice No: 13653

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
2/18/2015	JD	7	Review and analyze status letter re GS Yuasa Corp	0.20 450.00/hr	90.00
			For professional services rendered	0.20	$90.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	$90.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

April 01, 2015
Invoice No: 13667

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
3/9/2015	JD	7	Review and analyze order regarding class representatives to submit supplemental information	0.10 450.00/hr	45.00
			For professional services rendered	0.10	$45.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.10	450.00	$45.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

May 05, 2015
Invoice No: 13681

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
4/28/2015	JD	7	Review correspondence pertaining to defendant's discovery	0.10 450.00/hr	45.00
4/28/2015	JMB	7	Review correspondence from co-counsel regarding defendant's discovery	0.10 650.00/hr	65.00
4/30/2015	JD	7	Review correspondence pertaining to defendant's discovery	0.10 450.00/hr	45.00
4/30/2015	JMB	11	Correspond with [redacted] and co-counsel regarding defendant's discovery	0.20 450.00/hr	130.00
			For professional services rendered	0.50	$285.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	$90.00
Joseph M. Breall (JMB)	0.30	650.00	$195.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

March 05, 2014
Invoice No: 13532

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
2/10/2014	JD	7	Review and analyze IPP letter re strike nationwide class allegations	0.20 450.00/hr	90.00
			For professional services rendered	0.20	$90.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.20	450.00	$90.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

April 01, 2014
Invoice No: 13535

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
3/11/2014	JD	7	Review and analyze stipulation and order regarding dismissal of claims	0.10 450.00/hr	45.00
3/11/2014	JD	9	Review and analyze supplemental motion to dismiss	0.20 450.00/hr	90.00
			For professional services rendered	0.30	$135.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.30	450.00	$135.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

September 01, 2014
Invoice No: 13585

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
8/12/2014	JD	7	Review and analyze updated discovery procedures regarding class representatives	0.30 450.00/hr	135.00
8/15/2014	JD	7	Review and analyze discovery letter to Judge Ryu regarding class representatives	0.20 450.00/hr	90.00
			For professional services rendered	0.50	$225.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.50	450.00	$225.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

October 01, 2014
Invoice No: 13593

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
9/22/2014	JD	9	Review and analyze preservation declaration	0.20 450.00/hr	90.00
9/22/2014	JD	7	Review correspondence [redacted] from lead counsel	0.20 450.00/hr	90.00
9/22/2014	JD	11	Draft correspondence [redacted] regarding declaration and letter from lead counsel	0.40 450.00/hr	180.00
9/23/2014	JD	11	Further correspondence to [redacted] regarding declaration and letter from lead counsel	0.30 450.00/hr	135.00
9/26/2014	JD	11	Correspond with [redacted] regarding declaration	0.10 450.00/hr	45.00
9/29/2014	JD	7	Review and analyze [redacted] product information	0.50 450.00/hr	225.00
9/29/2014	JD	11	Draft correspondence regarding preservation declaration and [redacted] products	0.20 450.00/hr	90.00
9/30/2014	JD	11	Correspond with lead counsel regarding declaration and product questions	0.20 450.00/hr	90.00
			For professional services rendered	2.10	$945.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	2.10	450.00	$945.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

December 01, 2014
Invoice No: 13617

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
11/12/2014	JD	7	Review correspondence from [redacted] regarding product	0.10 450.00/hr	45.00
11/13/2014	JD	11	Correspond with [redacted] regarding product purchases	0.30 450.00/hr	135.00
			For professional services rendered	0.40	$175.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.40	450.00	$175.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

July 01, 2013
Invoice No: 13475

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
6/24/2013	JD	11	Correspond with Demetrius of Cotchett Pitre & McCarthy regarding case status and CAC	0.10 450.00/hr	45.00
6/28/2013	JD	11	Correspond with [redacted] regarding protective order	0.20 450.00/hr	90.00
			For professional services rendered	0.30	$135.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.30	450.00	$135.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

August 01, 2013
Invoice No: 13479

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
7/1/2013	JD	11	Correspond regarding [redacted] agreement for consolidated amended complaint	0.30 450.00/hr	135.00
7/3/2013	JD	11	Correspond with [redacted] regarding consolidated amended complaint review	0.20 450.00/hr	90.00
7/3/2013	JD	11	Correspond with [redacted] and counsel regarding corrections to consolidated amended complaint	0.20 450.00/hr	90.00
7/3/2013	JD	9	Review and analyze consolidated amended complaint	1.50 450.00/hr	675.00
7/9/2013	JD	9	Continue and review of analysis of consolidated amended complaint	0.60 450.00/hr	270.00
7/10/2013	JD	9	Continue analysis of consolidated amended complaint	1.00 450.00/hr	450.00
			For professional services rendered	3.80	$1,710.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	3.80	450.00	$1,710.00

Breall & Breall, LLP
3625 California Street
San Francisco, CA 94118
Tax ID 94-3339033
Professional Services

[redacted]

September 03, 2013
Invoice No: 13486

In Reference to: In re Lithium Ion Batteries Antitrust Litigation

Professional Services

Date	Initials	Code	Description	Hrs/Rate	Amount
8/5/2013	JD	11	Review and analyze IPP Report Regarding Underlying Cases	0.30 450.00/hr	135.00
			For professional services rendered	0.30	$135.00

Timekeeper Summary

Name	Hours	Rate	Amount
Jill Diamond	0.30	450.00	$135.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
BREALL & BREALL, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	$350.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$350.00

EXHIBIT 16

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JENNIFER W. SPRENGEL IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP**

I, Jennifer W. Sprengel declare:

1. I am the managing partner of Cafferty Clobes Meriwether & Sprengel LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Krista Lepore and as counsel for IPPs throughout the course of this litigation. The background and experience of Cafferty Clobes Meriwether & Sprengel LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Cafferty Clobes Meriwether & Sprengel LLP has prosecuted this litigation solely on a contingent-fee basis and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While Cafferty Clobes Meriwether & Sprengel LLP devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Cafferty Clobes Meriwether & Sprengel LLP performed the following work: research, draft and file complaint on behalf of our client and coordinate with co-lead counsel.

5. A summary of work performed by Cafferty Clobes Meriwether & Sprengel LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Bryan L. Clobes in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Cafferty Clobes Meriwether & Sprengel LLP and filed on May 26, 2017. (ECF No. 1813-12). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Cafferty Clobes Meriwether & Sprengel LLP since June 1, 2013 was 3.5, with a corresponding lodestar of $2,712.50 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses Cafferty Clobes Meriwether & Sprengel LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Cafferty Clobes Meriwether & Sprengel LLP expended a total of $309.80 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Cafferty Clobes Meriwether & Sprengel LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Cafferty Clobes Meriwether & Sprengel LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 4, 2019 at Chicago, Illinois.

/s/ Jennifer W. Sprengel

Jennifer W. Sprengel

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A



Cafferty Clobes Meriwether&Sprengel LLP

www.caffertyclobes.com

I. Overview

Cafferty Clobes Meriwether & Sprengel LLP, which has offices in Chicago, the greater Philadelphia area, and Ann Arbor, combines the talents of attorneys with a wide range of experience in complex civil litigation. The skill and experience of CCMS attorneys has been recognized on repeated occasions by courts that have appointed these attorneys to major positions in complex multidistrict or consolidated litigation. As the representative sampling of cases listed below demonstrates, these attorneys have taken a leading role in numerous important actions on behalf of investors, employees, consumers, businesses and others. In addition, CCMS attorneys are currently involved in a number of pending class actions, as described on the Firm's web page.

II. Auto Defect and Other Consumer Class Actions

Auto Defect Cases

Squires et al., v. Toyota Motor Corp., et al., No. 18-cv-00138 (E.D. Tex.). CCMS investigated, originated and filed the first and only consumer class action brought on behalf of owners of multi-model year Toyota Prius vehicles that suffer from a defect that causes windshields to crack and fail in ordinary and foreseeable driving conditions. Plaintiffs allege that Defendants have breached express and implied warranties, and have violated the consumer protection statutes of various States.

In re General Motors Corp. Air Conditioning Marketing and Sales Practices Litig., MDL No. 2818 (E.D. Mich.). After conducting a significant pre-suit investigation, CCMS filed the first class action in the Eastern District of Michigan seeking relief on behalf of owners of GM vehicles suffering from a defect in the air conditioning system which typically results in total system failure, necessitating significant repairs thereto. Since commencing the action, CCMS has communicated with dozens of affected consumers and worked with GM assess the scope and nature of an extended warranty program GM implemented in a purported effort to resolve the claims of certain vehicle owners. On April 11, 2018, the Court appointed CCMS co-lead counsel.

Gonzalez, et al., v. Mazda Motor Corp., et al., No. 16-cv-2087 (N.D. Cal.). CCMS is lead counsel in a consumer class action brought on behalf of owners of Model Year 2010-15 Mazda3 vehicles with defective clutch assemblies that cause them to prematurely fail. Plaintiffs allege that Defendants have breached express and implied warranties, and have violated the consumer protection statutes of various states. *See, e.g., Gonzalez v. Mazda Motor Corp.*, No. 16-CV-02087-MMC, 2017 WL 345878 (N.D. Cal. Jan. 5, 2017) (denying and granting in part Defendants' motion to dismiss).

Lax v. Toyota Motor Corp., No. 14-cv-1490 (N.D. Cal.). CCMS served as class counsel in an action brought on behalf of owners of certain Toyota-brand vehicles that contained a defect which caused vehicles to consume oil at accelerated rates, often resulting in catastrophic engine failure. Following extensive discovery and mediation, the parties reached a private settlement following Toyota's

implementation of an extended warranty and reimbursement program for affected vehicles. ECF No. 82.

Sabol v. Ford Motor Company, No. 2:14-cv-06654 (E.D. Pa.). CCMS served as Lead Counsel in this class case brought on behalf of owners of various model 2010-2015 Ford, Volvo and Land Rover vehicles allegedly including a defect in certain Ecoboost engines. Defendant claimed it addressed and repaired the problem through a series of recalls and repairs. After briefing summary judgment and class certification, and several years of hard fought litigation, including substantial discovery, the parties entered into a settlement providing substantial monetary and other relief.

***Skeen v. BMW of N. Amer., LLC*,** No. 13-cv-1531 (D.N.J.). CCMS served as co-lead counsel in an action brought on behalf of owners of certain MINI Cooper-brand vehicles that contained a latent defect in a part of the engine known as the "timing chain tensioner" which caused the part to fail prematurely, eventually requiring replacement of that part or the entire engine. Following extensive discovery and mediation, the parties reached a global settlement on behalf of a nationwide class of vehicle owners. The efforts of the firm and its co-lead counsel resulted in a settlement which significantly extended warranty coverage, and reimbursed vehicle owners for tens of millions of dollars in out-of-pocket expenses incurred for repair and/or replacement.

***Davitt v. American Honda Motor Co., Inc.*,** No. 13-cv-381 (D.N.J.). CCMS served as plaintiffs' counsel in a class action brought on behalf of owners of 2007-09 Honda CRV vehicles that suffered from a defect that predisposed the door-locking mechanisms to premature failure. Following extensive dismissal briefing, discovery and mediation, the parties arrived at a global settlement that provided class members with extended warranty coverage for the defect and reimbursement of out-of-pocket expenses incurred in connection therewith.

***In re Takata Airbag Prod. Liability Litig.*,** MDL No. 2599 (S.D. Fla.). CCMS represents six named Class Plaintiffs and has been and continues to work closely with lead lounsel on this multi-billion dollar case involving defective airbags installed in tens of millions of affected vehicles manufactured by most major manufacturers. Class settlements with Honda and BMW providing class members with hundreds of millions of dollars and substantial programmatic relief have been finally approved and are the subject of pending appeals.

In re Volkswagen "Clean Diesel" Marketing, Sales Practices and Prod. Liability Litig., MDL No. 2672 (N.D. Cal.). CCMS worked closely with lead counsel and other class counsel in this class case challenging unlawful actions by the manufacturer defendants to mask the actual diesel emission levels in various vehicle makes and models. Judge Beyer approved a class settlement with defendants worth billions of dollars.

Other Consumer Cases

***Albright v. The Sherwin-Williams Company*,** No. 17-cv-02513 (N.D. Ohio). CCMS is serving as Co-Lead Counsel in this class action concerning deck resurfacing products sold under the Duckback

and SuperDeck brand names. Plaintiffs allege that defendants have breached express and implied warranties, and have violated the consumer protection statutes of various states.

Anderson v. Behr Process Corp., No. 1:17-cv-08735 (N.D. Ill.). CCMS is serving as Co-Lead Counsel in this class action brought on behalf of purchasers of various deck coating products from 2012 through the present. After many months of mediation and settlement negotiations, and successfully opposing efforts by other plaintiffs and firms to have the JPML centralize pending cases, the parties have agreed to a proposed Class settlement which will provide substantial valuable monetary relief to Class members to refund the cost of product purchased as well as compensate them for damage to their decks and the costs of restoring and repairing the same.

Traxler v. PPG Industries, Inc., No. 15-cv-00912 (N.D. Ohio). CCMS served as lead counsel in this defective product action challenging certain defective deck resurfacing products. The products did not adhere properly, and instead peeled, cracked, bubbled and severely damaged the surfaces to which they were applied. In February 2017 the parties reached an agreement in principle to settle the case on behalf of a nationwide class of consumers. The efforts of the firm and its co-counsel resulted in a settlement that provides $6.5 million to affected homeowners.

Ponzo v. Watts Regulator Company, 1:14-cv-14080 (D. Mass.); ***Klug v. Watts Regulator Company,*** No. 15-cv-00061 (D. Neb.). These consumer class cases, first brought by CCMS (D. Mass.) addressed defective water heater and "Floodsafe" branded connectors. The plaintiffs in both cases alleged that the water heater connectors were made of a material that would break down during regular use, causing leaks and ruptures that flooded class members' homes. The efforts of the firm and its co-lead counsel resulted in a settlement that provides $14 million to affected homeowners.

Bergman v. DAP Products, Inc., 14-cv-03205 (D. Md.). CCMS served as lead counsel in this class action on behalf of consumers who purchased various models of "XHose" garden hoses, which were flexible outdoor hoses that were predisposed to leaking, bursting, seeping, and dripping due to design defects. The court approved a nationwide settlement providing hundreds of thousands of consumer class members with the opportunity to recover a substantial portion of their damages.

Apple iPhone Warranty Litigation (N.D. Cal.) This case challenged Apple's policy of denying warranty claims based on liquid contact indicators located in headphone jacks and dock connector ports of iPhones and iPod touches. Similar class actions were subsequently filed in federal courts on behalf of Apple consumers. CCMS helped negotiate and achieve a $53 million settlement of the state and federal cases.

In re Midway Moving & Storage, Inc.'s Charges to Residential Customers**,** No. 03 CH 16091 (Cir. Ct. Cook Cty., Il.). A class action on behalf of customers of Illinois' largest moving company. A litigation class was certified and upheld on appeal. *See Ramirez v. Midway Moving and Storage, Inc.*, 880 N.E.2d 653 (Ill. App. 2007). On the eve of trial, the case settled on a classwide basis.,The court stated that CCMS is "highly experienced in complex and class action litigation, vigorously prosecuted the

Class' claims, and achieved an excellent Settlement for the Class under which Class members will receive 100% of their alleged damages."

Walter Cwietniewicz d/b/a Ellis Pharmacy, et al. v. Aetna U.S. Healthcare, June Term, 1998, No. 423 (Pa. Common Pleas). On May 25, 2006, the court granted final approval to a settlement of a class action brought on behalf of pharmacies that participated in U.S. Healthcare's capitation program seeking to recover certain required semi-annual payments. At the final approval hearing, the court found that "this particular case was as hard-fought as any that I have participated in" and with respect to the Class's reaction to the settlement achieved as a result of our firm's work: ". . . a good job, and the reason there should be no objection, they should be very very happy with what you have done."

III. Antitrust Class Actions and Litigation

In Re Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation, MDL No. 2819 (E.D.N.Y). CCMS is a member of the Executive Committee representing a putative class of indirect purchasers of Restasis, an eye-drop used to treat dry-eye syndrome, and allege that Defendant Allergan engaged in various anticompetitive activities to illegally prolong the life of its patents over Restasis, and to otherwise forestall the entry of generic competition into the cyclosporine market.

In re Disposable Contact Lens Antitrust Litigation**,** MDL No. 2626 (M.D. Fla.)**.** CCMS serves on the Defendant Discovery Committee, which is tasked with overseeing all aspects of discovery pertaining to Defendants, who are alleged to have conspired to implement retail price maintenance agreements intended to inflate the prices of disposable contact lenses to supracompetitive levels. Plaintiffs already have secured an $8 million settlement from Defendant CooperVision.

In re Automotive Parts Antitrust Litig., MDL No. 2311 (E.D. Mich.). CCMS has served as a member of Plaintiffs' Executive Committee representing the end-payor class in one of the largest civil antitrust actions in US history. As a member of the Executive Committee, CCMS has played an important role in this groundbreaking litigation in which plaintiffs have recovered over $1 billion on behalf of end-payor consumers and businesses who allege they purchased or leased new automobiles at prices that were artificially inflated as a result of automotive component manufacturers' anticompetitive conduct.

Kamakahi v. American Society for Reproductive Medicine**,** No. 3:11-cv-01781 (N.D. Cal.). CCMS served as Co-Lead Counsel in a cutting edge antitrust case challenging the legality of ethical guidelines promulgated by two professional associations that limited the compensation members were permitted to pay to women providing donor services for in-vitro fertilization. Without the benefit of a parallel government case or investigation, CCMS achieved a groundbreaking settlement that required defendants to eliminate the compensation caps and to refrain from imposing similar caps in the future.

In re National Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litig., No. 4:14-md-02541 (N.D. Cal.). CCMS represents a former Division 1 college basketball player in this antitrust litigation challenging the cap imposed by the NCAA on grant-in-aid packages. The efforts of the firm and its co-counsel resulted in certification of an injunctive class and a settlement of $209 million

In re Prandin Direct Purchaser Antitrust Litig., Civ. No. 10-12141 (E.D. Mich.). CCMS served as Co-Lead counsel for a plaintiff class of direct purchasers of the prescription drug repaglinide, which is manufactured and marketed by Novo Nordisk under the brand-name Prandin. Plaintiffs alleged that Novo Nordisk blocked FDA approval of generic versions of the drug by wrongfully manipulating the language of the "use code" filed with the FDA in connection with a method of use patent. The court approved a $19 million settlement.

In re Insurance Brokerage Antitrust Litig., MDL No. 1663 (D.N.J.). CCMS served as Co-Lead Counsel for plaintiffs in this class case alleging that insurance brokers and insurers conspired to allocate customers in a complicated scheme to maximize their own revenues at the expense of class members. The litigation concluded in 2013 with final approval of the last of five separate settlements that, in total, exceeded $270 million. Judge Claire C. Cecchi observed that "Class counsel include notably skilled attorneys with experience in antitrust, class actions and RICO litigation." *Id.* at *17; *see also In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 2007 WL 1652303, at *6 (D.N.J. June 5, 2007).

In re New Motor Vehicles Canadian Export Antitrust Litig., MDL No. 1532 (D. Me.). CCMS served as Class Counsel in multidistrict litigation alleging that automobile manufacturers and other parties conspired to prevent lower priced new motor vehicles from entering the American market thereby artificially inflating prices. The court approved a $37 million settlement with Toyota and the Canadian Automobile Dealers' Association.

In re TriCor Indirect Purchaser Antitrust Litig., No. 05-360 (D. Del). CCMS served as Lead Counsel for consumer and third-party payor plaintiffs who alleged that defendants engaged in unlawful monopolization in the market for fenofibrate products, which are used to treat high cholesterol and high triglyceride levels. The court approved to a $65.7 million settlement (an amount that excludes an initial payment to opt-out insurance companies).

Nichols v. SmithKline Beecham Corp., No. Civ.A.00-6222 (E.D. Pa.). CCMS served as Co-Lead Counsel for consumers and third-party payors who alleged that the manufacturer of the brand-name antidepressant Paxil misled the U.S. Patent Office into issuing patents that protected Paxil from competition from generic substitutes. The court approved a $65 million class action settlement for the benefit of consumers and third-party payors who paid for Paxil.

In re Relafen Antitrust Litig. No. 01-12239 (D. Mass.). The court approved a $75 million class action settlement for the benefit of consumers and third-party payors who paid for branded and

generic versions of the arthritis medication Relafen. In certifying an exemplar class of end-payors, the court singled out our Firm as experienced and vigorous advocates. *See In re Relafen Antitrust Litig.*, 221 F.R.D. 260, 273 (D. Mass. 2004). In the opinion granting final approval to the settlement, the court commented that "Class counsel here exceeded my expectations in these respects [*i.e.*, experience, competence, and vigor] in every way." *In re Relafen Antitrust Litig.,* 231 F.R.D. 52, 85 (D. Mass. 2005); *see also id.* at 80 ("The Court has consistently noted the exceptional efforts of class counsel.").

VisaCheck/MasterMoney Antitrust Litig., Master File No. 96-5238 (E.D.N.Y.). CCMS's client, Burlington Coat Factory Warehouse, and the other plaintiffs, alleged that Visa and MasterCard violated the antitrust laws by forcing retailers to accept all of their branded cards as a condition of acceptance of their credit cards. The parties entered into settlement agreements that collectively provided for the payment of over $3.3 billion, plus widespread reforms and injunctive relief.

In re Warfarin Sodium Antitrust Litig., MDL 98-1232 (D. Del.). Multidistrict class action on behalf of purchasers of Coumadin, the brand-name warfarin sodium manufactured and marketed by DuPont Pharmaceutical Company. Plaintiffs alleged that the defendant engaged in anticompetitive conduct that wrongfully suppressed competition from generic warfarin sodium. The Court approved a $44.5 million settlement.

In re Cardizem CD Antitrust Litig., MDL No. 1278 (E.D. Mich.). Multidistrict class action on behalf of purchasers of Cardizem CD, a brand-name heart medication. Plaintiffs alleged that an agreement between the brand manufacturer and a generic manufacturer unlawfully stalled generic competition. The court approved an $80 million settlement for the benefit of consumers, third-party payors and state attorneys general.

In re Synthroid Marketing Litig., MDL No. 1182 (N.D. Ill). This multidistrict action arose out of alleged unlawful activities with respect to the marketing of Synthroid, a levothyroxine product used to treat thyroid disorders. The court approved a consumer settlement in the amount of $87.4 million.

IV. Commodities Litigation

In re Libor-Based Financial Instruments, 11-md-2262 (S.D.N.Y). CCMS serves as class counsel for exchange trader plaintiffs in claims involving manipulation in violation of the Commodity Exchange Act against many of the world's largest financial institutions.

Hershey/Kohen v. Pacific Investment Management Co. LLC, No. 05 C 4681 (N.D. Ill.). As liaison and class counsel in action arising from PIMCO's manipulation of 10-year treasury notes futures traded on the Chicago Board of Trade, CCMS helped secure a $118 million settlement for the class.

In re Crude Oil Commodity Futures Litig., No. 11-cv-03600 (S.D.N.Y.). As class counsel in action arising from manipulation of NYMEX West Texas Intermediate grade crude oil futures contracts, CCMS expended significant resources assisting the class with investigation and discovery. The collective efforts resulted in a $16.5 million settlement for the class.

In re Foreign Exchange Benchmark Rates Antitrust Litigation, 13-cv-7789 (S.D.N.Y.). As class counsel in this action arising from manipulation of foreign exchange rates by international banks and others, CCMS has devoted significant resources toward investigation, discovery, and allocation of more than $2 billion in settlements for the class.

In re Sumitomo Copper Litig., 96 Civ. 4584(MP) (S.D.N.Y.). As class counsel in action arising out of manipulation of the world copper market, CCMS helped achieve settlements aggregating $134.6 million. In awarding attorneys' fees, Judge Milton Pollack noted that it was "the largest class action recovery in the 75 plus year history of the Commodity Exchange Act." 74 F. Supp. 2d 393 (S.D.N.Y. Nov. 15, 1999).

In re Soybean Futures Litig., No. 89 C 7009 (N.D. Ill.). As class counsel in this action against Ferruzzi Finanziaria SpA and related companies for unlawfully manipulating the soybean futures market, CCMS helped recover a $21.5 million settlement.

VI. Individual Biographies

PARTNERS

PATRICK E. CAFFERTY graduated from the University of Michigan, with distinction, in 1980 and obtained his J.D., *cum laude*, from Michigan State University College of Law in 1983. From 1983 to 1985, he served as a prehearing attorney at the Michigan Court of Appeals and as a Clerk to Judge Glenn S. Allen, Jr. of that Court. Mr. Cafferty is an experienced litigator in matters involving antitrust, securities, commodities, and the pharmaceutical industry. In 2002, Mr. Cafferty was a speaker at a forum in Washington D.C. sponsored by Families USA and Blue Cross/Blue Shield styled "Making the Drug Industry Play Fair." At the Health Action 2003 Conference in Washington D.C., Mr. Cafferty was a presenter at a workshop titled "Consumers' Access to Generic Drugs: How Brand Manufacturers Can Derail Generic Drugs and How to Make Them Stay on Track." In 2010, Mr. Cafferty made a presentation on indirect purchaser class actions at the American Antitrust Institute's annual antitrust enforcement conference. *See Indirect Class Action Settlements* (Am. Antitrust Inst., Working Paper No. 10-03, 2010). Mr. Cafferty is admitted to the state bars of Michigan and Illinois, and holds several federal district and appellate court admissions. Mr. Cafferty has attained the highest rating, AV®, from Martindale-Hubbell and is a top rated SuperLawyer®.

BRYAN L. CLOBES is a 1988 graduate of the Villanova University School of Law and received his undergraduate degree from the University of Maryland. Mr. Clobes clerked for Judge Arlin M. Adams

of the United States Court of Appeals for the Third Circuit, Judge Mitchell H. Cohen of the United States District Court for the District of New Jersey, and Judge Joseph Kaplan of the Maryland Circuit Court in Baltimore. From 1989 through June, 1992, Mr. Clobes served as Trial Counsel to the Commodity Futures Trading Commission in Washington, D.C. Mr. Clobes has served as lead counsel in many of the firm's class cases covering all areas of the firm's practice, and is widely recognized as an expert in class action litigation. Mr. Clobes has authored briefs filed with the Supreme Court in a number of class cases, served as a panelist for class action, consumer and antitrust CLE programs, has sustained and maintained the highest rating, AV®, from Martindale-Hubbell, and has been named a "Super Lawyer" for the past twelve years. Mr. Clobes is admitted to the bar in New Jersey and Pennsylvania, and admitted to practice in several federal district and appellate court admissions.

DANIEL O. HERRERA received his law degree, *magna cum laude*, and his MBA, with a concentration in finance, from the University of Illinois at Urbana-Champaign in 2008. Mr. Herrera received his bachelor's degree in economics from Northwestern University in 2004. Mr. Herrera joined CCMS as an associate in 2011 and is resident in its Chicago, Illinois Office. Since joining CCMS, Mr. Herrera has successfully prosecuted a wide range of antitrust, consumer and commodities class action. Prior to joining CCMS, Mr. Herrera was an associate in the trial practice of Mayer Brown LLP, a Chicago-based national law firm, where he defended corporations in securities and antitrust class actions, as well as SEC and DOJ investigations and enforcement actions. Mr. Herrera also routinely handled commercial matters on behalf of corporate clients. Mr. Herrera is licensed to practice in Illinois and holds several federal district and appellate court admissions.

ANTHONY F. FATA graduated from the Miami University of Ohio (B.A., 1995), and *with honors* from the Ohio State University College of Law (J.D. 1999), where he was elected to the Order of the Coif and served as Managing Editor of The Ohio State Journal on Dispute Resolution. Mr. Fata began his career at McDermott Will & Emery, where he defended SEC enforcement actions as well as securities, consumer and product defect class actions. Since joining CCMS, Mr. Fata has successfully prosecuted a wide range of commodities, securities, antitrust and consumer class actions. Mr. Fata has also successfully represented clients in securities arbitrations, corporate investigations, securities/commodities regulatory proceedings, commercial litigation and transactional matters. Mr. Fata serves an Adjunct Professor for the Seton Hall University Law School's M.S.J. and L.LM online programs, where he has taught Securities Regulation and Compliance, Regulating Brokers and Dealers, Corporate Governance Enforcement and Risk Management, Corporate Finance, and Corporate Law. Mr. Fata has authored numerous articles concerning the securities industry, corporate governance, internal investigations and class actions. Mr. Fata serves on the Editorial Board of the Chicago Bar Association's *CBA Record*. He also serves as an investigator on the Chicago Bar Association's Judicial Evaluation Committee. He is admitted to the bar in Illinois, and holds several federal and appellate court admissions.

ELLEN MERIWETHER received her law degree from George Washington University, *magna cum laude*, in 1985. She was a member of the *George Washington Law Review* and was elected to the Order of the Coif. Ms. Meriwether received a B.A. degree, *with highest honors*, from LaSalle University in 1981. Ms. Meriwether is on the Board of Directors of the American Antitrust Institute (AAI) and is Editorial

Board Co-Chair of ANTITRUST, a publication by the section of Antitrust Law of the American Bar Association. Since 2010, Ms. Meriwether has been included in the US News and World Report Publication of "Best Lawyers in America" in the field of Antitrust. She has been named a "Pennsylvania Super Lawyer" for the past ten years and has attained the highest rating, "AV", from Martindale-Hubbell. She is a frequent presenter on topics relating to complex, class action and antitrust litigation and has been a faculty member at The George Mason Institute of Law and Economics for Judges. Ms Meriwether has published a number of articles on subjects relating to class actions and antitrust litigation, including, among others: "The Fiftieth Anniversary of Rule 23: Are Class Actions on the Precipice?," *Antitrust,* (Vol. 30, No. 2, Spring 2016); "Motorola Mobility and the FTAIA: If Not Here, Then Where?," *Antitrust*, Vo. 29, No.2 Spring 2015); *"Comcast Corp. v. Behrend:* Game Changing or Business as Usual?," *Antitrust*, (Vol. 27, No. 3, Summer 2013). Links to these articles and others authored by Ms Meriwether can be found on the firm's website. Ms. Meriwether is admitted to the bar of Pennsylvania and holds several federal district and appellate court admissions.

JENNIFER WINTER SPRENGEL received her law degree from DePaul University College of Law, where she was a member of the DePaul University Law Review. Her undergraduate degree was conferred by Purdue University. Ms. Sprengel is an experienced litigator in matters involving commodities, antitrust, insurance and the financial industries. In addition, Ms. Sprengel is a committee member of the Seventh Circuit Electronic eDiscovery Pilot Program and is a frequent speaker regarding issues of discovery. Links to some of her presentations and articles can be found on the firm's website. She also serves as co-chair of the Antitrust Law subcommittee of the ABA Class Action and Derivative Suits committee. She is admitted to practice law in Illinois, holds several federal district and appellate court admissions, and has attained the highest rating, AV®, from Martindale-Hubbell. Ms. Sprengel serves as the managing partner of the Firm.

NYRAN ROSE RASCHE received her undergraduate degree *cum laude* from Illinois Wesleyan University in 1995, was awarded a graduate teaching fellowship for law school, and earned her law degree from the University of Oregon School of Law in 1999. Following law school, Ms. Rasche served as a law clerk to the Honorable George A. Van Hoomissen of the Oregon Supreme Court. She is the author of *Protecting Agricultural Lands: An Assessment of the Exclusive Farm Use Zone System*, 77 Oregon Law Review 993 (1998) and *Market Allocation through Contingent Commission Agreements: Strategy and Results in In re Insurance Brokerage Antitrust Litigation* (with Ellen Meriwether), The Exchange: Insurance and Financial Services Developments (Spring 2015). Since joining CCMS, Ms. Rasche has successfully prosecuted a wide range of antitrust, consumer class, securities and commodities class actions. Ms. Rasche has been admitted to practice in the state courts of Oregon and Illinois, as well as the United States District Courts for the Northern District of Illinois and the Southern District of Illinois. She is also a member of the American and Chicago Bar Associations.

ASSOCIATES

BRIAN P.O'CONNELL received his law degree in 2013 from Northwestern University Pritzker School of Law, where he served as Executive Articles Editor for the *Journal of International Human Rights Law* and was a teaching assistant at the Center on Negotiation and Mediation. In 2009, Mr. O'Connell

received B.A from Stanford University, where he served as a staff writer, features editor and, finally, Editor-in-Chief of *The Stanford Review*. Following law school, Mr. O'Connell served a legal fellowship in the chambers of Judge Marvin E. Aspen of the United States District Court for the Northern District of Illinois. Prior to joining CCMS, Mr. O'Connell was an associate at a firm specializing in securities and commodities litigation. Mr. O'Connell is licensed to practice in Illinois and California, as well as the United States District Court for the Northern District of Illinois. He is also a member of the Illinois State and Chicago Bar Associations.

JOHN SCHEFLOW received his law degree from the University of Wisconsin Law School in 2014, and his bachelor's degree from Miami University in 2009. Mr. Scheflow joined CCMS's Chicago Office in 2015, and is currently representing plaintiffs in antitrust, consumer, securities, and commodities class actions. Mr. Scheflow has also successfully represented clients in commercial litigation and transactional matters. Prior to joining CCMS, Mr. Scheflow represented individuals in personal injury and mass tort cases. Mr. Scheflow is licensed to practice in Illinois and Wisconsin and before the United States District Courts for the Northern District of Illinois and Western District of Wisconsin.

CHRISTOPHER P.T. TOUREK received his law degree, *cum laude*, from the University of Illinois College of Law in 2013. In law school, he was a member of the Federal Civil Rights Clinic. Mr. Tourek earned his bachelors from Lafayette College. Mr. Tourek joined CCMS in 2017 and is resident in its Chicago, Illinois Office. Prior to joining CCMS, Mr. Tourek was an associate at a consumer protection class action firm for three years, during which time he earned the distinction of *Super Lawyers Illinois Rising Star—Class Action/Mass Torts* for 2016 and 2017. Mr. Tourek is licensed to practice in the state courts of Illinois and Washington, D.C., as well as the United States District Courts for the Northern District of Illinois, the Southern District of Illinois, and the Eastern District of Michigan.

SENIOR COUNSEL

DOM J. RIZZI received his B.S. degree from DePaul University in 1957 and his J.D. from DePaul University School of Law in 1961, where he was a member of the *DePaul University Law Review*. From 1961 through 1977, Judge Rizzi practiced law, tried at least 39 cases, and briefed and argued more than 100 appeals. On August 1, 1977, Judge Rizzi was appointed to the Circuit Court of Cook County by the Illinois Supreme Court. After serving as circuit court judge for approximately one year, Judge Rizzi was elevated to the Appellate Court of Illinois, First District, where he served from 1978 to 1996. Judge Rizzi became counsel to the firm in October 1996.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	305.00
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	4.80
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$309.80

EXHIBIT 17

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF BRYAN L. CLOBES IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP**

I, Bryan L. Clobes, declare:

1. I am a partner of Cafferty Clobes Meriwether & Sprengel LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Krista Lepore and as counsel for IPPs throughout the course of this litigation. The background and experience of Cafferty Clobes Meriwether & Sprengel LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Cafferty Clobes Meriwether & Sprengel LLP has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While Cafferty Clobes Meriwether & Sprengel LLP devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Cafferty Clobes Meriwether & Sprengel LLP performed the following work: research, draft and file complaint on behalf of our client and coordinate with co-lead counsel.

5. Attached hereto as **Exhibit B** is a billing summary of Cafferty Clobes Meriwether & Sprengel LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Cafferty Clobes Meriwether & Sprengel LLP during this period of time was 3.5 with a corresponding lodestar based on current rates of $2,712.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Cafferty Clobes Meriwether & Sprengel LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Cafferty Clobes Meriwether & Sprengel LLP has incurred during the course of this litigation. Cafferty Clobes Meriwether & Sprengel LLP expended a total of $309.80 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Cafferty Clobes Meriwether & Sprengel LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Cafferty Clobes Meriwether & Sprengel LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Chicago, Illinois.

/s/ Bryan L. Clobes

Bryan L. Clobes

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Cafferty Clobes Meriwether&Sprengel LLP

Chicago • Philadelphia • Ann Arbor
www.caffertyclobes.com

I. Overview

Cafferty Clobes Meriwether & Sprengel LLP, which has offices in Chicago, Philadelphia, and Ann Arbor, combines the talents of attorneys with a wide range of experience in complex civil litigation. The skill and experience of CCMS attorneys has been recognized on repeated occasions by courts that have appointed these attorneys to major positions in complex multidistrict or consolidated litigation. As the cases listed below demonstrate, these attorneys have taken a leading role in numerous important actions on behalf of investors, employees, consumers, businesses, and others. In addition, CCMS attorneys are currently involved in a number of pending class actions, as described on the Firm's web page.

II. Antitrust Class Actions and Litigation

***Kamakahi v. American Society for Reproductive Medicine*,** No.3:11-cv-01781 (N.D. Cal.). CCMS served as Co-Lead Counsel in a cutting edge antitrust case challenging the legality of ethical guidelines promulgated by two professional associations that limited the compensation members were permitted to pay to women providing donor services for in-vitro fertilization procedures. Without the benefit of a parallel government case or investigation, CCMS achieved a groundbreaking settlement (approved on August 26, 2016) that requires the defendants to eliminate the compensation caps, and to refrain from imposing similar caps in the future. *See Kamakahi v. Amer. Soc. for Reproductive Medicine,* No. 11-1781, 2013 WL 1768706 (N.D. Cal. Mar. 29, 2013)(denying motion to dismiss); *Kamakahi v. Amer. Soc. for Reproductive Medicine,* 305 F.R.D. 164 (N.D. Cal. 2015) (granting class certification).

In re Prandin Direct Purchaser Antitrust Litig., Civ. No. 10-12141 (E.D. Mich.). CCMS served as Co-Lead counsel for a plaintiff class of direct purchasers of the prescription drug repaglinide, which is manufactured and marketed by Novo Nordisk under the brand-name Prandin. Plaintiffs alleged that Novo Nordisk blocked FDA approval of generic versions of the drug by wrongfully manipulating the language of the "use code" filed with the FDA in connection with a method of use patent. On January 20, 2015, the court granted final approval to a $19 million settlement. *See In re Prandin Direct Purchaser Antitrust Litig.*, No. 10-12151, 2015 WL 8335997 (E.D. Mich. Jan. 20, 2015).

In re Insurance Brokerage Antitrust Litig., MDL No. 1663 (D.N.J.). CCMS was appointed Co-Lead Counsel for plaintiffs who alleged that insurance brokers and insurers conspired to allocate customers in a complicated scheme to maximize their own revenues at the expense of class members. The litigation concluded in August 2013 with final approval of last of five separate settlements that, in aggregate, exceeded $270 million. *See*: (1) *In re Insurance Brokerage Antitrust Litig.,* MDL No. 1663, 2007 WL 542227, (D.N.J. Feb. 16, 2007) (approving $121.8 million settlement with the Zurich Defendants), *aff'd,* 579 F.3d 241(3d Cir. 2009); (2) *In re Insurance Brokerage Antitrust Litig.,* MDL No. 1663, 2007 WL 2589950 (D.N.J. Sept. 4, 2007) (approving $28 million settlement with the Gallagher Defendants), *aff'd,* 579 F.3d 241(3d Cir. 2009); (3) *In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 2009 WL 411877 (D.N.J. Feb. 17, 2009) (approving $69 million settlement with Marsh & McLennan Cos. Inc.); (4) *In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 2012 WL 1071240

(D.N.J. Mar. 30, 2012) (approving $41 million settlement with several defendants, including AIG, Hartford, Fireman's Fund and Travelers); and (5) *In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 297 F.R.D. 136 (D.N.J. 2013) (approving $10.5 million settlement with ACE defendants, Chubb defendants and Munich Re defendants). Judge Claire C. Cecchi observed that "Class counsel include notably skilled attorneys with experience in antitrust, class actions and RICO litigation." *Id.* at *17; *see also In re Insurance Brokerage Antitrust Litig.*, MDL No. 1663, 2007 WL 1652303, at *6 (D.N.J. June 5, 2007).

In re New Motor Vehicles Canadian Export Antitrust Litig., MDL No. 1532 (D. Me.). CCMS was appointed Class Counsel, together with other firms, in multidistrict litigation alleging that automobile manufacturers and other parties conspired to prevent lower priced new motor vehicles from entering the American market during certain periods, thereby artificially inflating prices. *See, e.g., In re New Motor Vehicles Canadian Export Antitrust Litig.*, 270 F.R.D. 30, 35 (D. Me. 2010). On February 3, 2012, the court approved a $37 million settlement with Toyota and the Canadian Automobile Dealers' Association. *In re New Motor Vehicles Canadian Export Antitrust Litig.*, MDL 1532, 2012 WL 379947 (D. Me. Feb. 3, 2012).

In re TriCor Indirect Purchaser Antitrust Litig., No. 05-360 (D. Del). CCMS was appointed Co-Lead Counsel for consumer and third-party payor plaintiffs who alleged that defendants engaged in unlawful monopolization in the market for fenofibrate products, which are used to treat high cholesterol and high triglyceride levels. *See Abbott Laboratories v. Teva Pharmaceuticals, Inc.*, 432 F. Supp. 2d 408 (D. Del. 2006) (denying defendants' motions to dismiss). On October 28, 2009, the court granted final approval to a $65.7 million settlement (an amount that excludes an initial payment to opt-out insurance companies).

Nichols v. SmithKline Beecham Corp., No. Civ.A.00-6222 (E.D. Pa.). CCMS served as Co-Lead Counsel for consumers and third-party payors who alleged that the manufacturer of the brand-name antidepressant Paxil misled the U.S. Patent Office into issuing patents that protected Paxil from competition from generic substitutes. On April 22, 2005, Judge John R. Padova granted final approval to a $65 million class action settlement for the benefit of consumers and third-party payors who paid for Paxil. *Nichols v. SmithKline Beecham Corp.*, No. Civ.A.00-6222, 2005 WL 950616, 2005-1 Trade Cas. (CCH) ¶74,762 (E.D. Pa. April 22, 2005). *See also Nichols v. SmithKline Beecham Corp.*, No. Civ.A.00-6222, 2003 WL 302352, 2003-1 Trade Cas. (CCH) ¶ 73,974 (E.D. Pa. Jan. 29, 2003) (denying defendant's motion to strike expert testimony).

In re Relafen Antitrust Litig. No. 01-12239 (D. Mass.). On September 28, 2005, Judge William G. Young of the United States District Court for the District of Massachusetts granted final approval to a $75 million class action settlement for the benefit of consumers and third-party payors who paid for branded and generic versions of the arthritis medication Relafen. In certifying an exemplar class of end-payors, the court singled out our Firm as experienced and vigorous advocates. *See In re Relafen Antitrust Litig.*, 221 F.R.D. 260, 273 (D. Mass. 2004). In the opinion granting final approval to the settlement, the court commented that "Class counsel here exceeded my expectations in these respects [*i.e.*, experience, competence, and vigor] in every way." *In re Relafen Antitrust Litig.*, 231 F.R.D. 52, 85

(D. Mass. 2005); *see also id.* at 80 ("The Court has consistently noted the exceptional efforts of class counsel."). The litigation resulted in many significant decisions including: 286 F Supp. 2d 56 (D. Mass. 2003) (denying motion to dismiss); 346 F. Supp. 2d 349 (D. Mass. 2004) (denying defendant's motion for summary judgment).

VisaCheck/MasterMoney Antitrust Litig., Master File No. 96-5238 (E.D.N.Y.). CCMS's client, Burlington Coat Factory Warehouse, and the other plaintiffs alleged that Visa and MasterCard violated the antitrust laws by forcing retailers to accept all of their branded cards as a condition of acceptance of their credit cards. On June 4, 2003, the parties entered into settlement agreements that collectively provided for the payment of over $3.3 billion, plus widespread reforms and injunctive relief. On December 19, 2003, the Settlement was finally approved by Judge John Gleeson. On January 4, 2005, the Second Circuit Court of Appeals affirmed Judge Gleeson's decision.

In re Warfarin Sodium Antitrust Litig., MDL 98-1232 (D. Del.). Multidistrict class action on behalf of purchasers of Coumadin, the brand-name warfarin sodium manufactured and marketed by DuPont Pharmaceutical Company. Plaintiffs alleged that the defendant engaged in anticompetitive conduct that wrongfully suppressed competition from generic warfarin sodium. On August 30, 2002, the Court granted final approval to a $44.5 million settlement. *See In re Warfarin Sodium Antitrust Litig.*, 212 F.R.D. 231 (D. Del. 2002). On December 8, 2004, the Third Circuit upheld approval of the settlement. 391 F.3d 516 (3d Cir. 2004).

In re Cardizem CD Antitrust Litig., MDL No. 1278 (E.D. Mich.). Multidistrict class action on behalf of purchasers of Cardizem CD, a brand-name heart medication. Plaintiffs alleged that an agreement between the brand manufacturer and a generic manufacturer unlawfully stalled generic competition. On October 1, 2003, Judge Nancy Edmunds granted final approval to an $80 million settlement for the benefit of consumers, third-party payors and state attorneys general. *In re Cardizem CD Antitrust Litig.,* 218 F.R.D. 508 (E.D. Mich. 2003), *app. dismissed*, 391 F.3d 812 (6th Cir. 2004). The litigation resulted in several significant decisions, including: 105 F. Supp. 618 (E.D. Mich. 2000) (denying motions to dismiss); 105 F. Supp. 2d 682 (E.D. Mich. 2000) (granting plaintiffs' motions for partial summary judgment and holding agreement *per se* illegal under federal and state antitrust law); 200 F.R.D. 326 (E.D. Mich. 2001) (certifying exemplar end-payor class); 332 F.3d 896 (6th Cir. 2003) (upholding denial of motion to dismiss and grant of partial summary judgment).

Blevins v. Wyeth-Ayerst Labs., No. 324380 (Sup. Ct. San Francisco Cty. CA). Plaintiff alleged that Wyeth-Ayerst unlawfully monopolized the market for conjugated estrogen drug products through exclusive contracts with health benefit providers and pharmacy benefit managers. On October 30, 2007, the court approved a $5.2 million settlement for a class of California purchasers of Wyeth-Ayerst's conjugated estrogen drug product.

In re DDAVP Indirect Purchaser Antitrust Litig., No. 05-2237 (S.D.N.Y.). CCMS was appointed Co-Lead Counsel for consumer and third-party payor plaintiffs who alleged that defendants the defendant pharmaceutical manufacturers relied upon sham patents and sham patent litigation to

preclude generic competition. On December 18, 2013, the court entered an order approving a $4.75 million settlement.

In re Synthroid Marketing Litig., MDL No. 1182 (N.D. Ill). This multidistrict action arises out of alleged unlawful activities with respect to the marketing of Synthroid, a levothyroxine product used to treat thyroid disorders. On August 4, 2000, the court granted final approval of a consumer settlement in the amount of $87.4 million. *See* 188 F.R.D. 295 (N.D. Ill. 1999). On August 31, 2001, approval of the settlement was upheld on appeal. *See* 264 F.3d 712 (7th Cir. 2001).

III. Commodities and Securities Class Actions and Derivative Litigation

In re Kaiser Group International, Case No. 00-2263 (Bankr. D. Del.). On December 7, 2005, Chief Judge Mary F. Walrath of the United States Bankruptcy Court for the District of Delaware granted final approval to a settlement that produced 175,000 shares of common stock for a class of former shareholders of ICT Spectrum Contructors, Inc. (a company that merged with ICF Kaiser Group International and ICF Kaiser Advanced Technology in 1998). The settlement followed Judge Joseph J. Farnan's ruling which upheld the Bankruptcy Court's decision to award common stock of the new Kaiser entity (Kaiser Group Holdings, Inc.) to the Class of former Spectrum shareholders based on contractual provisions within the merger agreement. *See Kaiser Group International, Inc. v. James D. Pippin (In re Kaiser Group International)*, 326 B.R. 265 (D. Del. 2005).

Danis v. USN Communications, Inc., No. 98 C 7482 (N.D. Ill.). Securities fraud class action arising out of the collapse and eventual bankruptcy of USN Communications, Inc. On May 7, 2001, the court approved a $44.7 million settlement with certain control persons and underwriters. Reported decisions: 73 F. Supp. 2d 923 (N.D. Ill. 1999); 189 F.R.D. 391 (N.D. Ill. 1999); 121 F. Supp. 2d 1183 (N.D. Ill. 2000).

In re Exide Corp. Sec. Litig., No. 98-CV-60061 (E.D. Mich.). Securities fraud class action arising out of sales and financial practices of leading battery manufacturer. On September 2, 1999, Judge George Caram Steeh approved a settlement in the amount of $10.25 million.

Hoxworth v. Blinder Robinson & Co., No. 88-0285 (E.D. Pa.). Securities fraud and RICO class action resulting from alleged manipulative practices and boiler-room operations in the sale of "penny stocks." *See* 903 F.2d 186 (3rd Cir. 1990). Judgment in excess of $70 million was obtained in February, 1992. The judgment was affirmed by the Third Circuit Court of Appeals, 980 F.2d 912 (3rd Cir. 1992). *See also Hoxworth v. Blinder*, 74 F.3d 205 (10th Cir. 1996).

IV. Employee Benefits Class Actions

Polk v. Hecht, No. 92-1340 (D.N.J.). Class action brought under the Employee Retirement Income Act of 1974 on behalf of all participants or beneficiaries under the Mutual Benefit Life Savings and Investment Plan for Employees on July 16, 1991, when Mutual Benefit Life Insurance Corporation

was placed in rehabilitation. On April 12, 1995, Judge Harold A. Ackerman approved a $4.55 million settlement, noting that "[c]ounsel did a darn good job, and the record should be clear on that point, that that is the opinion, for what it's worth, of this Court."

In re Unisys Retiree Medical Benefits ERISA Litig., MDL No. 969 (E.D. Pa). Class action on behalf of over 25,000 retirees of Unisys Corporation concerning entitlement to retiree medical benefits. After trial, in November 1994, Chief Judge Cahn approved a partial settlement in the amount of $72.9 million. *See* 57 F.3d 1255 (3d Cir. 1995).

V. Consumer and Other Class Actions

Beattie v. CenturyTel, Inc., Civ. No. 02-10277 (E.D. Mich.). A class action on behalf of telephone customers in numerous states who were billed for an inside wire maintenance program improperly described in bills as "Non-Regulated Services." Plaintiffs alleged violation of the truth-in-billing requirements of the Federal Telecommunications Act. A litigation class was certified and upheld on appeal. *See Beattie v. CenturyTel, Inc.*, 511 F.3d 554 (6th Cir. 2007). On July 9, 2010, the court granted final approval to a $13 million cash settlement.

In re Midway Moving & Storage, Inc.'s Charges to Residential Customers, No. 03 CH 16091 (Cir. Ct. Cook Cty., Il.). A class action on behalf of customers of Illinois' largest moving company whose final moving charges exceeded their pre-move written estimates. Plaintiffs alleged violation of the Illinois Consumer Fraud Act, breach of contract and breach of the covenant of good faith and fair dealing. A litigation class was certified and upheld on appeal. *See Ramirez v. Midway Moving and Storage, Inc.*, 880 N.E.2d 653 (Ill. App. 2007). On the eve of trial, the case settled on a class-wide basis. On October 12, 2012, the Court (Judge Richard J. Elrod) granted final approval and stated that CCMS is "highly experienced in complex and class action litigation, vigorously prosecuted the Class' claims, and achieved an excellent Settlement for the Class under which Class members will receive 100% of their alleged damages."

Apple iPhone Warranty Litigation (N.D. Cal.) On January 29, 2010, CCMS first of its kind class action against Apple in the Superior Court of Santa Clara County, with the goal of achieving a nationwide recovery for all similarly situated Apple consumers. The suit challenged Apple's policy of denying warranty claims based on liquid contact indicators located in headphone jacks and dock connector ports of iPhones and iPod touches. Similar class actions were subsequently filed in federal courts on behalf of Apple consumers. Our firm, together with other counsel representing the state and federal plaintiffs, achieved a $53 million global settlement of the state and federal cases. On May 8, 2014, the Honorable Judge Richard Seeborg granted final approval to the settlement.

PrimeCo Personal Communications, L.P. v. Illinois Commerce Commission, No. 98 CH 5500 (Circuit Court of Cook County, Ill.). This class action sought recovery of an unconstitutional infrastructure maintenance fee imposed by municipalities on telephone and other telecommunications customers in the State of Illinois. On August 1, 2002, the court granted final approval to a settlement of wireless telephone and pager customers' claims against the City of Chicago worth over $31 million.

VI. Individual Biographies

PARTNERS

PATRICK E. CAFFERTY graduated from the University of Michigan, with distinction, in 1980 and obtained his J.D., *cum laude*, from Michigan State University College of Law in 1983. From 1983 to 1985, he served as a prehearing attorney at the Michigan Court of Appeals and as a Clerk to Judge Glenn S. Allen, Jr. of that Court. Mr. Cafferty is an experienced litigator in matters involving antitrust, securities, commodities, and the pharmaceutical industry. In 2002, Mr. Cafferty was a speaker at a forum in Washington D.C. sponsored by Families USA and Blue Cross/Blue Shield styled "Making the Drug Industry Play Fair." At the Health Action 2003 Conference in Washington D.C., Mr. Cafferty was a presenter at a workshop titled "Consumers' Access to Generic Drugs: How Brand Manufacturers Can Derail Generic Drugs and How to Make Them Stay on Track." In 2010, Mr. Cafferty made a presentation on indirect purchaser class actions at the American Antitrust Institute's annual antitrust enforcement conference. *See Indirect Class Action Settlements* (Am. Antitrust Inst., Working Paper No. 10-03, 2010). Mr. Cafferty is admitted to the state bars of Michigan and Illinois, and holds several federal district and appellate court admissions. Mr. Cafferty has attained the highest rating, AV®, from Martindale-Hubbell and is a top rated SuperLawyer®.

BRYAN L. CLOBES is a 1988 graduate of the Villanova University School of Law and received his undergraduate degree from the University of Maryland. While in law school, Mr. Clobes clerked for Judge Arlin M. Adams of the United States Court of Appeals for the Third Circuit and Judge Mitchell H. Cohen of the United States District Court for the District of New Jersey. In 1988, after graduating from law school, Mr. Clobes served as a law clerk to Judge Joseph Kaplan of the Maryland Circuit Court in Baltimore. From 1989 through June, 1992, Mr. Clobes served as Trial Counsel to the Commodity Futures Trading Commission in Washington, D.C. Mr. Clobes authored *In the Wake of Varity Corp. v. Howe: An Affirmative Duty to Disclose Under ERISA,* 9 DePaul Bus. L.J. 221 (1997). Mr. Clobes is also a member of the Amicus Committee of the National Association of Securities and Commercial Law Attorneys and he has authored briefs filed with the Supreme Court in a number of ERISA cases, including *Varity Corp. v. Howe* and *Schoonejongen v. Curtiss-Wright Corp.* Mr. Clobes has attained the highest rating, AV®, from Martindale-Hubbell and has been named a "Pennsylvania Super Lawyer" in each of the past three years. Mr. Clobes has been admitted to the bar in New Jersey and Pennsylvania, the Supreme Court of the United States, the United States Court of Appeals for the Third Circuit and the United States District Court for the Eastern District of Pennsylvania.

ELLEN MERIWETHER received her law degree from George Washington University, *magna cum laude*, in 1985. She was a member of the *George Washington Law Review* and was elected to the Order of the Coif. Ms. Meriwether received a B.A. degree, *with highest honors*, from LaSalle University in 1981. She was an adjunct professor at LaSalle University teaching a course in the University's honors program from 1988-1993. Ms. Meriwether is a member of the Bar of the Commonwealth of Pennsylvania and is admitted to practice before the United States Supreme Court, the United States Courts of Appeals for the First, Second, Third, Seventh, Tenth and Eleventh Circuits, and the United

States District Court for the Eastern District of Pennsylvania. In 2012 Ms. Meriwether was Chair of the Federal Courts Committee of the Philadelphia Bar Association, and has chaired several of its subcommittees. Ms. Meriwether is a member of the Board of the Public Interest Law Center, the Advisory Board of the American Antitrust Institute and is Articles Editor of ANTITRUST, a publication by the section of Antitrust Law of the American Bar Association. She is a frequent presenter on topics relating to complex, class action and antitrust litigation and has been a faculty member at The George Mason Institute of Law and Economics for Judges, lecturing on the topic of How Lawyers use Economic Evidence in Antitrust Litigation. Ms Meriwether has published a number of articles on subjects relating to class actions and antitrust litigation, including: "The Fiftieth Anniversary of Rule 23: Are Class Actions on the Precipice?," *Antitrust,* (Vol. 30, No. 2, Spring 2016); "Motorola Mobility and the FTAIA: If Not Here, Then Where?," *Antitrust*, Vo. 29, No.2 Spring 2015); *"Comcast Corp. v. Behrend:* Game Changing or Business as Usual?," *Antitrust*, (Vol. 27, No. 3, Summer 2013); "Class Action Waiver And the Effective Vindication Doctrine At the Antitrust/Arbitration Crossroads," *Antitrust*, (Vol. 3, Summer 2012); "The Hazards of *Dukes*: Antitrust Plaintiffs Need Not Fear the Supreme Court's Decision," *Antitrust*, (Vol. 26, No. 1, Fall 2011); "Economic Experts: The Challenges of Gatekeepers and Complexity," *Antitrust*, (Vol. 25, No. 3 Summer 2011); "Putting the 'Squeeze' on Refusal to Deal Cases: Lessons from *Trinko* and *linkLine*," (Vol. 24, No. 2, Spring 2010) and "Rigorous Analysis in Certification of Antitrust Class Actions: A Plaintiff's Perspective." (Vol. 21, No. 3, Summer 2007). Since 2010, Ms. Meriwether has been included in the US News and World Report Publication of "Best Lawyers in America" in the field of Antitrust Law. She has been named a "Pennsylvania Super Lawyer" for the past ten years and has attained the highest rating, "AV", from Martindale-Hubbell.

JENNIFER WINTER SPRENGEL received her law degree from DePaul University College of Law, where she was a member of the DePaul University Law Review. Her undergraduate degree was conferred by Purdue University. Ms. Sprengel is an experienced litigator in matters involving commodities, antitrust, insurance and the financial industries. In addition, Ms. Sprengel is a committee member of the Seventh Circuit Electronic eDiscovery Pilot Program and is a frequent speaker on panels regarding issues of discovery. She also serves as co-chair of the Antitrust Law subcommittee of the ABA Class Action and Derivative Suits committee. She is admitted to practice law in Illinois, holds several federal district and appellate court admissions, and has attained the highest rating, AV®, from Martindale-Hubbell. Ms. Sprengel serves as the managing partner of the Firm.

ANTHONY F. FATA graduated *with honors* from The Ohio State University College of Law (J.D. 1999), where he: was elected to the Order of the Coif; served as Managing Editor of The Ohio State Journal on Dispute Resolution; earned, among other honors, the Albert A. Levin Award for Professional Responsibility, CALI award for Consumer Law, and CALI Excellence for the Future Award; and was selected based on outstanding academic achievement to serve as a research assistant to faculty in the areas of professional responsibility, civil procedure, and contracts. Mr. Fata received his undergraduate degree from Miami University in 1995, where he was selected to serve on the Miami University Student Foundation. Mr. Fata began his legal career in the trial and white collar practice groups at McDermott Will & Emery where he defended SEC enforcement actions as well as securities, consumer and product defect class actions. Since joining CCMS, Mr. Fata has successfully prosecuted

a wide range of commodities, securities, antitrust and consumer class actions, including multiple cases resulting in 100% recoveries for class members. In addition to his class action practice, Mr. Fata has successfully represented clients in securities arbitrations, corporate investigations, securities/commodities regulatory proceedings, commercial litigation and transactional matters. Among other publications, Mr. Fata has authored: *The Investigation is Internal, but Is this Document Privileged?* (PLI 2016); *The SEC's Whistleblower Bounty Program, Emerging Trends and their Impact on Internal Investigations* (PLI 2015); *The CFTC's Whistleblower Program* (PLI 2014); *Untangling the Seamless Web: Seven Critical Assumptions when Planning Internal Investigations* (PLI 2013); *Doomsday Delayed: How the Court's Party-Neutral Clarification of Class Certification Standards in Wal-Mart v. Dukes Actually Helps Plaintiffs*," 62 DePaul Law Review 401 (Spring 2013); *Class Actions: Attaining Settlement Class Certification Under Amchem and Ortiz*, 19 *Product Liability Law & Strategy 1* (2001); and *IICLE Securities Law*, Chapter 15 – Civil Remedies (2003) (contributing author). Mr. Fata's speaking engagements include the 22nd Annual DePaul Law Review Symposium, *Class Action Rollback? Wal-Mart v. Dukes and the Future of Class Action Litigation* (2012), the Practising Law Institute's *Internal Investigations* Seminar (2013-2016), as well as other lectures on federal class action practice and other topics. Mr. Fata serves as an investigator on the Chicago Bar Association's Judicial Evaluation Committee. He is admitted to the bar in Illinois, as well as the Sixth, Seventh and Ninth Circuit Courts of Appeals, the Northern District of Illinois (including its Trial Bar), the District of Colorado and the Eastern District of Michigan.

NYRAN ROSE RASCHE received her undergraduate degree *cum laude* from Illinois Wesleyan University in 1995, and earned her law degree from the University of Oregon School of Law in 1999. Following law school, Ms. Rasche served as a clerk to the Honorable George A. Van Hoomissen of the Oregon Supreme Court. She is the author of *Protecting Agricultural Lands: An Assessment of the Exclusive Farm Use Zone System*, 77 Oregon Law Review 993 (1998). Ms. Rasche is admitted to practice in the state courts of Oregon and Illinois, as well as the United States District Courts for the Northern District of Illinois and the Southern District of Illinois. She is also a member of the American and Chicago Bar Associations.

ASSOCIATES

DANIEL O. HERRERA received his law degree, *magna cum laude*, and his MBA, with a concentration in finance, from the University of Illinois at Urbana-Champaign in 2008. Mr. Herrera received his bachelor's degree in economics from Northwestern University in 2004. Mr. Herrera joined CCMS as an associate in 2011 and is resident in its Chicago, Illinois Office. Prior to joining CCMS, Mr. Herrera was an associate in the trial practice of a Chicago-based national law firm, where he defended corporations in securities and antitrust class actions, as well as SEC and DOJ investigations and enforcement actions. Mr. Herrera also routinely handled commercial matters on behalf of corporate clients. Mr. Herrera is licensed to practice in Illinois and before the U.S. District Court for the Northern District of Illinois.

CHRISTOPHER P.T. TOUREK received his law degree, *cum laude*, from the University of Illinois College of Law in 2013. In law school, he was a member of the Federal Civil Rights Clinic. Mr. Tourek earned his bachelors from Lafayette College. Mr. Tourek joined CCMS in 2017 and is resident in its

Chicago, Illinois Office. Prior to joining CCMS, Mr. Tourek was an associate at a consumer protection class action firm for three years, during which time he earned the distinction of *Super Lawyers Illinois Rising Star—Class Action/Mass Torts* for 2016 and 2017. Mr. Tourek is licensed to practice in the state courts of Illinois and Washington, D.C., as well as the United States District Courts for the Northern District of Illinois, the Southern District of Illinois, and the Eastern District of Michigan.

JOHN SCHEFLOW received his law degree from the University of Wisconsin in 2014, and his bachelor's degree from Miami University in 2009. Mr. Scheflow, who joined CCMS's Chicago office in 2015, is currently representing plaintiffs in actions against financial advisors and commodities manipulation class actions. Prior to joining CCMS, Mr. Scheflow represented individuals in personal injury and mass tort cases. Mr. Scheflow is licensed to practice in Illinois and Wisconsin and before the U.S. District Court for the Western District of Wisconsin.

BRIAN O'CONNELL received his law degree in 2013 from Northwestern University Pritzker School of Law, where he served as Executive Articles Editor for the *Journal of International Human Rights* and was a teaching assistant at the Center on Negotiation and Mediation. In 2009, Mr. O'Connell received B.A from Stanford University, where he served as a staff writer, feature editor and, finally, Editor-in-Chief of *The Stanford Review*. Following law school, Mr. O'Connell served a legal fellowship in the chambers of Judge Marvin E. Aspen of the United States District Court for the Northern District of Illinois. Prior to joining CCMS, Mr. O'Connell was an associate at a firm specializing in securities and commodities litigation. Mr. O'Connell is licensed to practice in Illinois, as well as the United States District Court for the Northern District of Illinois. He is also a member of the Illinois State and Chicago Bar Associations.

SENIOR COUNSEL

DOM J. RIZZI received his B.S. degree from DePaul University in 1957 and his J.D. from DePaul University School of Law in 1961, where he was a member of the *DePaul University Law Review*. From 1961 through 1977, Judge Rizzi practiced law, tried at least 39 cases, and briefed and argued more than 100 appeals. On August 1, 1977, Judge Rizzi was appointed to the Circuit Court of Cook County by the Illinois Supreme Court. After serving as circuit court judge for approximately one year, Judge Rizzi was elevated to the Appellate Court of Illinois, First District, where he served from 1978 to 1996. Judge Rizzi also teaches at both the undergraduate and graduate level: since 1980, he has been a part-time faculty member of the Loyola University School of Law and, since 1992, he has been a part-time faculty member at the University of Illinois-Chicago. Judge Rizzi became counsel to the firm in October 1996.

Dated: February 13, 2017

EXHIBIT B

Case 4:13-md-02420-YGR Document 2487-3 Filed 04/03/17 Page 5 of 7

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

Firm Name: Cafferty Clobes Meriwether & Sprengel LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Bryan L. Clobes	1.10								2.40						3.50	$775.00	$2,712.50
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**1.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.50**		**$2,712.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**1.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.50**		**$2,712.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Bryan L. Clobes	2013	690.00
Bryan L. Clobes	2014	700.00
Bryan L. Clobes	2015	725.00
Bryan L. Clobes	2016	750.00
Bryan L. Clobes	2017	775.00

EXHIBIT D

Cafferty Clobes Meriwether & Sprengel LLP

Lithium Ion Batteries

05/23/2017
FILE NO: 2336-001
STATEMENT NO: 1

Investigations, Factual Research

DRAFT STATEMENT

		HOURS	
10/10/2013			
BLC	Correspond and discuss with Kelly Tucker and co-lead counsel regarding status of proceedings	0.60	
01/18/2016			
BLC	Correspond with co-lead counsel regarding case status	0.50	
	FOR CURRENT SERVICES RENDERED	1.10	
	BALANCE DUE		$0.00

Cafferty Clobes Meriwether & Sprengel LLP

Lithium Ion Batteries

Page: 1
05/23/2017
FILE NO: 2336-009
STATEMENT NO: 1

Reading/Reviewing Pleadings, Briefs, Discovery

DRAFT STATEMENT

		HOURS	
07/02/2013			
BLC	Correspond w/co lead counsel re amended complaint and pleading issues.	1.40	
01/21/2014			
BLC	Correspond with co-lead counsel regarding dismissal decisions.	1.00	
	FOR CURRENT SERVICES RENDERED	2.40	
	BALANCE DUE		$0.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
CAFFERTY CLOBES MERIWETHER & SPRENGEL LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	305.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	4.80
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$309.80

EXHIBIT 18

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF LAURA ALEXANDER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF COHEN MILSTEIN SELLERS & TOLL**

I, Laura Alexander, declare:

1. I am a partner of Cohen Milstein Sellers & Toll, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Brian Hanlon and as counsel for IPPs throughout the course of this litigation. The background and experience of Cohen Milstein Sellers & Toll and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Cohen Milstein Sellers & Toll performed the following work: Preparing the document productions, interrogatory responses and other discovery responses from the named plaintiffs, reviewing documents from the Defendants' productions and conferring with lead counsel regarding them, drafting briefing concerning certain issues during motion practice and researching the same, among other tasks.

5. Attached hereto as **Exhibit B** is a billing summary of Cohen Milstein Sellers & Toll's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Cohen Milstein Sellers & Toll. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm. A summary of work performed by Cohen Milstein Sellers & Toll and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Brent W. Johnson in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and

Reimbursement of Expenses on Behalf of Cohen Milstein Sellers & Toll PLLC and filed on May 26, 2017. (ECF No. 1813-13). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. See Order dated May 17, 2013 (ECF No. 198)

6. In summary, the total number of hours spent by Cohen Milstein Sellers & Toll since June 1, 2013 was 3,074.1, with a corresponding lodestar based is $1,103,279.00.

7. Attached hereto as **Exhibit D** is a summary of the expenses Cohen Milstein Sellers & Toll has incurred from June 1, 2013 to present, plus applicable case filing fees. Cohen Milstein Sellers & Toll expended a total of $51,330.10 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Cohen Milstein Sellers & Toil on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Cohen Milstein Sellers & Toll ion this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 11, 2019 at Washington, D.C.

/s/ Laura Alexander

Laura Alexander

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

COHENMILSTEIN

COHENMILSTEIN

COHEN MILSTEIN SELLERS & TOLL PLLC

For decades, Cohen Milstein Sellers & Toll PLLC has represented individuals, small businesses, institutional investors, and employees in many of the major class action cases litigated in the United States for violations of the antitrust, securities, consumer protection, civil rights/discrimination, ERISA, employment, and human rights laws. Cohen Milstein is also at the forefront of numerous innovative legal actions that are expanding the quality and availability of legal recourse for aggrieved individuals and businesses both domestic and international. Over its history, Cohen Milstein has obtained many landmark judgments and settlements for individuals and businesses in the United States and abroad. The firm's most significant past and present cases include:

- HEMT MBS Litigation, (No. 1:08-cv-05653, U.S. District Court for the Southern District of New York). On May 10, 2016, U.S. District Judge Paul A. Crotty finally approved a $110 million settlement in the mortgage-backed securities class action brought by investors against Credit Suisse AG and its affiliates. This settlement ends claims brought by the New Jersey Carpenters Health Fund and other investors who claimed that the offering documents for the mortgage-backed securities at issue violated the Securities Act as they contained false and misleading misstatements concerning compliance with underwriting standards.

- In re Urethane Antitrust Litigation (Polyether Polyol Cases) (D. Kan.). Cohen Milstein serves as co-lead counsel on behalf of a class of direct purchasers of chemicals used to make many everyday products, from mattress foam to carpet cushion, who were overcharged as a result of a nationwide price-fixing conspiracy. On February 25, 2016, Cohen Milstein reached an agreement with The Dow Chemical Company to settle the case against Dow for $835 million. Combined with earlier settlements obtained from Bayer, Huntsman, and BASF, the Dow settlement pushed the total settlements in the case to $974 million. The settlement was approved on July 29, 2016.

- RALI MBS Litigation, (Civ. No. 08-8781, U.S. District Court for the Southern District of New York). In July 2015 On July 31, 2015, Judge Katherine Failla gave final approval to a $235 million settlement with underwriters Citigroup Global Markets Inc., Goldman Sachs & Co., and UBS Securities LLC. She also approved a plan for distribution to investors of those funds as well as the previously approved $100 million settlement with RALI, its affiliates, and the individual Defendants that was reached in in 2013. This global settlement marks an end to a long and complicated class action over MBS offerings that RALI and certain of its affiliates issued and sold to the New Jersey Carpenters Health Fund and other investors from 2006 through 2007. The case took seven years of intense litigation to resolve.

- In re: Bear Stearns Mortgage Pass-Through Certificates Litigation (No. 08-08093, U.S. District Court for the Southern District of New York). On May 27, 2015, U.S. District Judge Laura Taylor Swain finally approved a class action settlement with JPMorgan Chase & Co., which agreed to pay $500 million and up to an additional $5 million in litigation-related expenses to resolve claims arising from the sale of $27.2 billion of mortgage-backed securities issued by Bear Stearns & Co. during 2006 and 2007 in 22 separate public offerings.

- Harborview MBS Litigation, (No. 08-5093, U.S. District Court for the Southern District of New York). In February 2014, Cohen Milstein reached a settlement with the Royal Bank of Scotland (RBS) in the Harborview MBS Litigation, resolving claims that RBS duped investors into buying securities backed by shoddy home loans. The $275 million settlement is the fifth largest class action settlement in a federal MBS case. This case is one of eight significant MBS actions that Cohen Milstein has been named lead or co-lead counsel by courts and one of three that were nearly thrown out by the court, only to be revived in 2012.
- In Re Electronic Books Antitrust Litigation, (No. 11-md-02293, U.S. District Court for the Southern District of New York). In August 2014, a New York federal judge approved a $400 million antitrust settlement in the hotly contested ebooks price-fixing suit against Apple Inc. Combined with $166 million in previous settlements with five defendant publishing companies, consumers could receive more than $560 million. The settlement resolves damages claims brought by a class of ebook purchasers and attorneys general from 33 U.S. states and territories.

- Countrywide MBS Litigation, (2:10-cv-00302, U.S. District Court in the Central District of California). In April 2013, Plaintiffs in the landmark mortgage-backed securities (MBS) class action litigation against Countrywide Financial Corporation and others, led by Lead Plaintiff, the Iowa Public Employees' Retirement System (IPERS), agreed to a $500 million settlement. It is the nation's largest MBS-federal securities class action settlement. The settlement was approved in December 2013 and brings to a close the consolidated class action lawsuit brought in 2010 by multiple retirement funds against Countrywide and other defendants for securities violations involving the packaging and sale of MBS. The settlement is also one of the largest (top 20) class action securities settlements of all time.

- In re Beacon Associates Litigation (No. 09-cv-0777, United States District Court for the Southern District of New York). Class action settlement of $219 million for trustees and participants in ERISA-covered employee benefit plans whose assets were lost through investments made on their behalf by Beacon Associates LLC I & II in the investment schemes of Bernard Madoff.

- In re Plasma-Derivative Protein Therapies Antitrust Litigation (No. 09 C 7666, United States District Court for the Northern District of Illinois). After four years of litigation, in October of 2013, CSL Limited, CSL Behring LLC, CSL Plasma, Inc. (collectively, "CSL"), and the Plasma Protein Therapeutics Association ("PPTA") agreed to pay $64 million dollars to settle a lawsuit brought by the University of Utah Hospital and other health care providers alleging that CSL, the PPTA, and Baxter agreed between 2003-2009 to restrict the supply of immunoglobulin and albumin, and thereby increase the prices of those therapies. Two months later, Baxter International Inc. and Baxter Healthcare Corp. (collectively "Baxter") agreed to pay an additional $64 million to settle these claims – bringing the total recovery to the class to $128 million.

- Keepseagle v. Vilsack, Civil Action No. 1:99CV03119 (D.D.C.). A class of Native American farmers and ranchers allege that they have been systematically denied the same opportunities to obtain farm loans and loan servicing that have been routinely afforded white farmers by the USDA. A class was certified in 2001 by Judge Emmet Sullivan, District Judge for the U.S. District Court for the District of Columbia, and the D.C. Circuit declined USDA's request to review that decision. On October 19, 2010, the case reached a historic settlement, with the USDA agreeing to pay $680 million in damages to thousands of Native American farmers and ranchers and forgive up to $80 million worth of outstanding farm loan

debt.

- In re Parmalat Securities Litigation, No. 04 MD 1653 (S.D.N.Y.). In this securities litigation case, Cohen Milstein has successfully negotiated two partial settlements totaling approximately $90 million. At the second partial settlement hearing, Judge Lewis A. Kaplan remarked that plaintiffs counsel "did a wonderful job here for the class and were in all respects totally professional and totally prepared. I wish I had counsel this good in front of me in every case." Our clients, four large European institutional investors, were appointed as co-lead plaintiffs and we were appointed as co-lead counsel. Most notably, this case allowed us the opportunity to demonstrate our expertise in the bankruptcy area. During the litigation, the company subsequently emerged from bankruptcy and we added "New Parmalat" as a defendant because of the egregious fraud committed by the now-bankrupt old Parmalat. New Parmalat strenuously objected and Judge Kaplan of the Southern District of New York ruled in the class plaintiffs' favor, a ruling which was affirmed on appeal. This innovative approach of adding New Parmalat enabled the class to obtain an important additional source of compensation, as we subsequently settled with New Parmalat.

- Dukes v. Wal-Mart Stores, Inc., No. C-01-2252 (N.D. Cal.). Cohen Milstein is co-lead counsel in this sex discrimination case. In 2004, the U.S. District Court certified a nationwide class action lawsuit for all female employees of Wal-Mart who worked in U.S. stores anytime after December 26, 1998. This was the largest civil rights class action ever certified against a private employer, including approximately 1.5 million current and former female employees. That ruling was appealed, and while affirmed by the Ninth Circuit, was reversed by the Supreme Court in June 2011. Cohen Milstein argued the case for the plaintiffs-respondents in the Supreme Court. Since then, the *Dukes* action has been amended to address only the Wal-Mart regions that include stores in California, and other regional class cases have been or are soon to be filed. This litigation to resolve the merits of the claims – whether Wal-Mart discriminates against its female retail employees in pay and promotions – continues.

- Rubin v. MF Global, Ltd. (08-CV-02233, S.D.N.Y.). Acting as co-lead counsel in this class action, the Firm represented the Central States, Southeast and Southwest Areas Pension Fund which was one of the co-lead plaintiffs in the case. In September 2010, as a result of Plaintiffs' decision to appeal, the U.S. Second Circuit Court of Appeals vacated in part the lower court's dismissal of the case and remanded the case for further proceedings. In overturning the District Court decision, the Second Circuit issued a decision which differentiated between a forecast or a forward looking statement accompanied by cautionary language -- which the Appellate Court said would be insulated from liability under the bespeaks caution doctrine -- from a factual statement, or non-forward-looking statement, for which liability may exist. Importantly, the Second Circuit accepted Plaintiffs' position that where a statement is mixed, the court can sever the forward-looking aspect of the statement from the non-forward looking aspect. The Court further stated that statements or omissions as to existing operations (and present intentions as to future operations) are not protected by the bespeaks caution doctrine. Mediation followed this decision and resulted in a settlement comprised of $90 million in cash.

- Hughes v. Huron Consulting Group (09-CV-04734, N.D. Ill.). Cohen Milstein represented lead plaintiffs the Public School Teachers' Pension & Retirement Fund of Chicago and the Arkansas Public Employees Retirement System ("APERS") in this case against Huron Consulting Group, founded by former Arthur Anderson personnel following its collapse in the wake of the Enron scandal. In August 2010, the District Court for the Northern District of Illinois denied defendants' motions to dismiss in their entirety and upheld plaintiffs' allegations that defendants intentionally improperly accounted for acquisition-

related payments, which allowed plaintiffs to move forward with discovery. The case was settled for $40 million, comprised of $27 million in cash and 474,547 shares in Huron common stock, with an aggregate value at the time of final approval in 2011 of approximately $13 million.

- In re Lucent Technologies Securities Litigation, Civ. Action No. 00-621 (JAP) (D.N.J.). A settlement in this massive securities fraud class action was reached in late March 2003. The class portion of the settlement amounts to over $500 million in cash, stock and warrants and ranks as the second largest securities class action settlement ever completed. Cohen Milstein represented one of the co-lead plaintiffs in this action, a private mutual fund.

- Nate Pease, et al. v. Jasper Wyman & Son, Inc., et al., Civil Action No. 00-015 (Knox County Superior Court, Me.). In 2004, a state court jury from Maine found three blueberry processing companies liable for participating in a four-year price-fixing and non-solicitation conspiracy that artificially lowered the prices defendants paid to approximately 800 growers for wild blueberries. The jury ordered defendants Cherryfield Foods, Inc., Jasper Wyman & Son, Inc., and Allen's Blueberry Freezer, Inc. to pay $18.68 million in damages, the amount which the growers would have been paid absent the defendants' conspiracy. After a mandatory trebling of this damage figure under Maine antitrust law, the total amount of the verdict for the plaintiffs is just over $56 million. The Firm served as co-lead counsel.

- In re StarLink Corn Products, Liability Litigation, MDL No. 1403. (N.D. Ill.). Cohen Milstein successfully represented U.S. corn farmers in a national class action against Aventis CropScience USA Holding and Garst Seed Company, the manufacturer and primary distributor of StarLink corn seeds. StarLink is a genetically modified corn variety that the United States government permitted for sale as animal feed and for industrial purposes, but never approved for human consumption. However, StarLink was found in corn products sold in grocery stores across the country and was traced to widespread contamination of the U.S. commodity corn supply. The Firm, as co-lead counsel, achieved a final settlement providing more than $110 million for U.S. corn farmers, which was approved by a federal district court in April 2003. This settlement was the first successful resolution of tort claims brought by farmers against the manufacturers of genetically modified seeds.

- Snyder v. Nationwide Mutual Insurance Company, No. 97/0633 (Sup. Ct. N.Y. Onondaga Cty.). Cohen Milstein served as one of plaintiffs' principal counsel in this case on behalf of persons who held life insurance policies issued by Nationwide through its captive agency force. The action alleged consumer fraud and misrepresentations. Plaintiffs obtained a settlement valued at more than $85 million. The judge praised the efforts of Cohen Milstein and its co-counsel for having done "a very, very good job for all the people." He complimented "not only the manner" in which the result was arrived at, but also the "time … in which it was done."

- Oncology & Radiation Associates, P.A. v. Bristol Myers Squibb Co., et al., No. 1:01CV02313 (D.D.C.). Cohen Milstein has been co-lead counsel in this case since its inception in 2001. Plaintiffs alleged that Bristol-Myers Squibb unlawfully monopolized the United States market for paclitaxel, a cancer drug discovered and developed by the United States government, which Bristol sells under the brand name Taxol. Bristol's scheme included a conspiracy with American BioScience, Inc., a generic manufacturer, to block generic competition. Cohen Milstein's investigation and prosecution of this litigation on behalf of direct purchasers of Taxol led to a settlement of $65,815,000 that was finally approved by U.S. District Judge Emmet G. Sullivan on August 14, 2003 and preceded numerous Taxol-related litigations

brought by the Federal Trade Commission and State Attorneys General offices.

- Kruman v. Christie's International PLC, et al., Docket No. 01-7309. A $40 million settlement on behalf of all persons who bought or sold items through Christie's or Sotheby's auction houses in non-internet actions was approved in this action. Cohen Milstein served as one of three leading counsel on behalf of foreign plaintiffs. The Court noted that approval of the settlement was particularly appropriate, given the significant obstacles that faced plaintiffs and plaintiffs' counsel in the litigation. The settlement marked the first time that claims on behalf of foreign plaintiffs under U.S. antitrust laws have been resolved in a U.S. court, a milestone in U.S. antitrust jurisprudence.

- Roberts v. Texaco, Inc., 94-Civ. 2015 (S.D.N.Y.). Cohen Milstein represented a class of African-American employees in this landmark litigation that resulted in the then-largest race discrimination settlement in history ($176 million in cash, salary increases and equitable relief). The Court hailed the work of class counsel for, *inter alia,* "framing an imaginative settlement, that may well have important ameliorative impact not only at Texaco but in the corporate context as a whole …".

- Trotter v. Perdue Farms, Inc., Case No. 99-893 (RRM) (JJF) (MPT), D. Del. This suit on behalf of hourly workers at Perdue's chicken processing facilities – which employ approximately 15,000 people – forced Perdue to pay employees for time spent "donning and doffing," that is, obtaining, putting on, sanitizing and removing protective equipment that they must use both for their own safety and to comply with USDA regulations for the safety of the food supply. The suit alleged that Perdue's practice of not counting donning and doffing time as hours worked violated the Fair Labor Standards Act and state law. In a separate settlement with the Department of Labor, Perdue agreed to change its pay practices. In addition, Perdue is required to issue retroactive credit under one of its retirement plans for "donning and doffing" work if the credit would improve employees' or former employees' eligibility for pension benefits. Cohen Milstein was co-lead counsel.

Awards & Recognition

In 2017, Law360 selects Cohen Milstein as a Competition Practice Group of the Year and a Class Action Practice Group of the Year.

In 2016, Law360 Names Cohen Milstein's Richard A. Koffman a Competition Law MVP.

In 2016, Cohen Milstein Partner Martha Geer was selected as a 2016 North Carolina Leaders in the Law Honoree.

In 2016, the Washington Lawyers' Committee for Civil Rights and Urban Affairs named Cohen Milstein Sellers & Toll a recipient of its 2016 Outstanding Achievement Award.

In 2016, for the eighth consecutive year, Cohen Milstein was recognized by The Legal 500 as one of the leading plaintiff class action antitrust firms in the United States.

In 2016, Agnieszka Fryszman, Joel Laitman, Chris Lometti, Kit Pierson, Joe Sellers and Steve Toll were named to the 2016 Lawdragon 500 Leading Lawyers in America. As one of the most elite distinctions in the legal profession, the annual Lawdragon 500 recognizes the 'best of the best' of the 1.2 million members of the U.S. legal profession.

In 2016, Law360 named Cohen Milstein Partner Julie Goldsmith Reiser one of the 25 Most Influential Women in Securities Law.

In 2016, Cohen Milstein is named to the National Law Journal's "Plaintiffs Hot List" for the fifth time in six years.

In 2016, Law360 names Cohen Milstein as one of the top firms for female attorneys.

In 2015, Law360 selects Cohen Milstein as the sole plaintiff firm to be selected in two "Practice Groups of the Year" categories and one of only five class action firms recognized.

In 2015, Cohen Milstein was named an Elite Trial Lawyer Firm by the National Law Journal for the second year in a row.

In 2015, Cohen Milstein Partner Steven J. Toll named a Law360 MVP in Securities Law.

In 2015, Cohen Milstein is selected as a "Most Feared Plaintiffs Firm" by Law360 for the third year in a row.

In 2015, Partner Richard Koffman was named, for the fifth consecutive year, in the Legal 500 United States "Leading Lawyers" list under the category of "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust".

In 2015, Cohen Milstein Attorney Jeffrey Dubner was named a National Law Journal D.C. Rising Star.

In 2015, five Cohen Milstein Attorneys were named to the 2016 The Best Lawyers in America© list.

In 2015, Cohen Milstein's Denver office was named "Antitrust Law Firm of the Year – Colorado" by Global Law Experts.

In 2015, Partners Theodore J. Leopold and Leslie M. Kroeger and Of Counsel Attorney Stephan A. LeClainche were selected to the 2015 Florida Super Lawyers list and Adam J. Langino was selected to the Florida Rising Stars list.

In 2015, Cohen Milstein attorneys R. Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll and Christine E. Webber were selected as Washington DC Super Lawyers.

In 2015, Cohen Milstein attorneys Laura Alexander, Monya Bunch, S. Douglas Bunch, Joshua S. Devore, Jeffrey Dubner, Johanna Hickman, Kalpana Kotagal, Emmy Levens, and David Young were selected as Washington DC Rising Stars by Super Lawyers.

In 2015, for the fourth time in five years, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**

In 2015, Cohen Milstein Partner Carol V. Gilden was selected as "Pension Funds Litigation Attorney of the Year in Illinois" for the second year in a row by the Corporate INTL Legal Awards.

In 2014, Cohen Milstein's Antitrust Practice was selected as a Practice Group of the Year by Law360.

In 2014, Cohen Milstein Partner Kit Pierson was selected as an MVP by Law360.

In 2014, Cohen Milstein was named a "**Most Feared Plaintiffs Firm**" by Law360 for the second year in a row.

In 2014, Cohen Milstein was selected as an **Elite Trial Lawyer** firm by the National Law Journal.

Cohen Milstein Partners Steven J. Toll, Joseph M. Sellers, Kit A. Pierson, and Agnieszka M. Fryszman Selected to the **2014 Lawdragon 500**.

Joseph M. Sellers, Theodore J. Leopold, and Leslie M. Kroeger Make "**Best Lawyers**' List" for 2015.

Released in 2014, the 2013 SCAS 50 Report on Total Securities Class Action Settlements once again ranked Cohen Milstein as a top firm.

In 2014, Theodore J. Leopold, a partner at Cohen Milstein, was been selected to the Top 100 Miami Florida Super Lawyers list. Partner Leslie M. Kroeger was selected to the **2014 Florida Super Lawyers** list and Diana L. Martin was selected to the **Florida Rising Stars** list.

In 2014, Cohen Milstein attorneys Leslie M. Kroeger and Adam J. Langino were both recognized in the 2014 edition of **Florida Trend's Florida Legal Elite**™. Kroeger is recognized as Legal Elite and Langino is listed as an Up-and-Comer.

In 2014, Cohen Milstein was selected to the selected to the **National Law Journal's Midsize Hot List**.

In 2014, Cohen Milstein was recognized as a "**Highly Recommended Washington, DC Litigation Firm**" by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2014, Cohen Milstein was ranked as a **Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500** for the sixth year in a row.

In 2014, Partner Richard Koffman was named, for the fourth consecutive year, in the Legal 500 United States "**Leading Lawyers**" list under the category of "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust".

In 2014, Cohen Milstein attorneys Christopher Cormier, Agnieszka Fryszman, Julie Goldsmith Reiser, Joseph Sellers, Daniel Sommers, and Steven Toll were recognized **as Local Litigation Stars** by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2014, Cohen Milstein attorneys R. Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll and Christine E. Webber were selected as **Washington DC Super Lawyers**.

In 2014, Cohen Milstein attorneys Laura Alexander, Monya Bunch, S. Douglas Bunch, Joshua S. Devore, Jeffrey Dubner, Johanna Hickman, Joshua Kolsky, Kalpana Kotagal, Emmy Levens, Michelle Yau and David Young were selected as **Washington DC Rising Stars** by Super Lawyers.

In 2014, Cohen Milstein Partner Carol V. Gilden was selected as the Illinois Pension Fund Attorney of the Year.

In 2014, Best Lawyers named Cohen Milstein Partner Joseph Sellers D.C. Litigation - Labor & Employment Lawyer of the Year.

In 2013, for the third-year in a row, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2013, Cohen Milstein was named a "**Most Feared Plaintiffs Firm**" by Law360.

In 2013, Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500 for the fifth year in a row.

In 2013, Cohen Milstein attorneys Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie G. Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll, and Christine E. Webber were selected as **Washington DC Super Lawyers**.

In 2013, Cohen Milstein attorneys Joshua Devore and Michelle Yau were selected as **Washington DC Rising Stars** by Super Lawyers.

In 2013, Cohen Milstein Partner Carol V. Gilden was selected as a **2013 Illinois Super Lawyer**. She has been selected every year since 2005.

In 2012, for the second-year in a row, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2012, Cohen Milstein was the recipient of the Judith M. Conti Pro Bono Law Firm of the Year Award from the Employment Justice Center.

In 2012, Cohen Milstein was recognized as a "Highly Recommended Washington, DC Litigation Firm" by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2012, Cohen Milstein was ranked as a top firm by the 2011 SCAS Report on Total Securities Class Action Settlements.

In 2012, Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500 for the fourth year in a row.

In 2012, Partner Joseph M. Sellers was selected as a **Washington DC Super Lawyer**. Mr. Sellers was also selected for this prestigious award in 2007, 2008, 2009, 2010, and 2012.

In 2012, Partner Steven J. Toll was selected as a **Washington DC Super Lawyer**. Mr. Toll was also selected for this prestigious award in 2007, 2009, 2010, and 2011.

In 2012, Partner Daniel S. Sommers was selected as a **Washington DC Super Lawyer**. Mr. Sommers was also selected for this prestigious award in 2011.

In 2012, Partner Christine E. Webber was selected as a **Washington DC Super Lawyer**. Ms. Webber was also selected for this prestigious award in 2007.

In 2012, Partner Agnieszka M. Fryszman was selected as a **Washington DC Super Lawyer**.

In 2012, Partner Kit A. Pierson was selected as a **Washington DC Super Lawyer**.

In 2012, Partner Carol V. Gilden was selected as an **Illinois Super Lawyer**. Ms. Gilden was also selected for this prestigious award in 2005, 2006, 2007, 2008, 2009, 2010, and 2011.

In 2011, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2011, Partner Joseph M. Sellers was selected as a **"Visionary"** by The *National Law Journal.*

In 2011, Partner J. Douglas Richards, Of Counsel Joel Laitman, and Of Counsel Christoper Lometti were selected as **New York - Metro Super Lawyers**.

In 2011, Partner Joseph M. Sellers and the *Keepseagle v. Vilsack* team were selected as a finalist for the **2011 Trial Lawyer of the Year Award** from the Public Justice Foundation.

In 2011, **Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States** by the Legal 500 for the third year in a row.

In 2011, Partners Steven Toll, Joseph Sellers, and Daniel Sommers were selected as **Washington DC Super Lawyers**. Partner J. Douglas Richards, Of Counsel Joel Laitman and Christoper Lometti were selected as **New York - Metro Super Lawyers**. Partner Carol Gilden was selected as an **Illinois Super Lawyer**.

In 2011, Cohen Milstein was a recipient of The *National Law Journal's* **Pro Bono Award**. The Firm was named one of the "six firms that best reflect the pro bono tradition."

In 2010, Partner Joseph M. Sellers was selected as one of "**The Decade's Most Influential Lawyers**" by *The National Law Journal*.

In 2010, Partner Steven J. Toll was named one of Law360's "**Most Admired Attorneys**".

In 2010, Partner Andrew N. Friedman was selected as a **Washington DC Super Lawyer**.

In 2010, Partner Agnieszka M. Fryszman was selected as a finalist for the **Trial Lawyer of the Year Award** from the Public Justice Foundation.

In 2010, Partners Joseph M. Sellers and Agnieszka M. Fryszman were both selected as one of the **Lawdragon 500 Leading Lawyers in America**.

In 2010, Cohen Milstein was once again ranked as a **Leading Plaintiff Class Action Antitrust Firm in the United States** by the Legal 500.

In 2009, Partner Steven J. Toll was named a **Top Attorney in Corporate Litigation for Securities Litigation** by Super Lawyers.

In 2009, Partners Joseph M. Sellers and Christine E. Webber were named as **Top Washington Lawyers** by the Washingtonian Magazine.

In 2009, Cohen Milstein was recognized as **one of the top 50 law offices in Washington D.C. for diversity efforts**.

In 2009, Cohen Milstein was nominated for the prestigious **Class Action Law Firm of the Year** award by Global Pensions magazine for the third year in a row.

Cohen Milstein ranked as a **2009 Leading Plaintiff Class Action Antitrust Firm in the United States** by *The Legal500*.

The **2008 SCAS Report on Total Securities Class Action Settlements** ranked Cohen Milstein as a top firm for the second year in a row.

In 2008, Cohen Milstein was nominated for the prestigious **Class Action Law Firm of the Year** award by Global Pensions magazine for the second year in a row.

In 2008, Managing Partner Steven J. Toll was named one of Lawdragon's **100 Lawyers You Need to Know in Securities Litigation.**

Attorney Profiles – Partners

Steven J. Toll

Steven J. Toll is Managing Partner at Cohen Milstein, a member of the Executive Committee, and Co-Chair of the firm's Securities Fraud & Investor Protection practice group. In this role, Mr. Toll guides the firm's mediation efforts and strategy, and has been lead or principal counsel on some of the most high-profile stock fraud lawsuits in the past 30 years, arguing important matters before the highest courts in the land.

Mr. Toll has built a distinguished career and reputation as a fierce advocate of the rights of shareholders and has guided mediation efforts on the firm's largest and most important matters (both securities fraud and other consumer type cases), a role in which he has earned the trust of mediators, as well as the respect of defense counsel. Mr. Toll has been involved in settling some of the most important mortgage-backed securities (MBS) class-action lawsuits in the aftermath of the financial crisis, including: Countrywide Financial Corp., which settled for $500 million in 2013; Residential Accredited Loans Inc. (RALI), which settled for $335 million in 2014; and the Harborview MBS suit, which settled for $275 million. He also negotiated a $90 million settlement of a suit against MF Global.

Among Mr. Toll's current matters is the Harman class action suit, where Mr. Toll argued and won an important ruling from the U.S. Court of Appeals for the District of Columbia Circuit. The Circuit Court reinstated the suit against electronics maker Harman International Industries; the ruling is significant in that it places limits on the protection allowed by the safe harbor rule for forward-looking statements.

Currently, Mr. Toll is also co-lead counsel in the BP Securities class action securities fraud lawsuit that arose from the devastating Deepwater oil spill in the Gulf of Mexico. The Fifth Circuit Court of Appeals recently affirmed the certification of the class of investors alleged to have been injured by BP's misrepresenting the amount of oil spilling into the Gulf of Mexico, and thus minimizing the extent of the cost and financial impact to BP of the clean up and resulting damages.

Mr. Toll is co-lead counsel in the consumer class action suit against Lumber Liquidators, a lawsuit that alleges the nationwide retailer sold Chinese-made laminate flooring containing hazardous levels of the carcinogen formaldehyde while falsely labeling their products as meeting or exceeding California emissions standards, a story that was profiled twice on 60 Minutes in 2015.

Mr. Toll is also leading Cohen Milstein's efforts in a $400 million derivative shareholder suit brought against the directors and officers of Bank Leumi, an Israeli bank, asserting that bank officers violated their fiduciary duties in conspiring to aid American taxpayers in hiding income from the IRS.

Mr. Toll has provided a great deal of pro bono legal work during a career at Cohen Milstein that spans more than three decades. In addition, he has been an active supporter of Children's Hospital National Medical Center for decades, setting up an endowment in his daughter's name to help the Hospital's leukemia patients and their families (his daughter passed away from leukemia in 1987), plus more recently establishing regular programs for music and laughter for the children during their hospital stays. He and his family also founded Lolly's Locks, a nonprofit organization that provides high-quality wigs to women cancer patients suffering from hair loss as a side effect of chemotherapy. Lolly's Locks was established in memory of Mr. Toll's late wife, Lolly, who passed away in 2012, after a 15-month battle with cancer.

Mr. Toll is a graduate of the Wharton School of the University of Pennsylvania, earning a B.S. cum laude, and received his J.D. from Georgetown University Law Center, where he was Special Project Editor of The Tax Lawyer. His name has appeared regularly on Law360's annual lists of MVP's, Leading Attorneys, and Most Admired Attorneys.

Joseph M. Sellers

Joseph M. Sellers is a Partner at Cohen Milstein, Chair of the firm's Executive Committee and Chair of the Civil Rights & Employment Practice Group, a practice he founded. In a career spanning nearly four decades, Mr. Sellers has represented victims of discrimination and other illegal employment practices individually and through class actions. He brings to his practice a deep commitment and broad background in fighting discrimination in all its forms. That experience includes decades of representing clients in litigation to enforce their civil rights, participating in drafting and efforts to pass landmark civil rights legislation, testifying before Congress on various civil rights issues, training government lawyers on the trial of civil rights cases, teaching civil rights law at various law schools and lecturing extensively on civil rights and employment matters.

Mr. Sellers, who joined the firm in 1997, has been practicing civil rights law for more than 35 years, during which time he has represented individuals and classes of people who have been victims of civil rights violations or denied other rights in the workplace. He has tried to judgment before courts and juries several civil rights class actions and a number of individual cases and has argued more than 30 appeals in the federal and state appellate courts, including the United States Supreme Court. He has served as class counsel, and typically lead counsel, in more than 75 civil rights and employment class actions.

His clients have included persons denied the rights and opportunities of employment because of race, national origin, religion, age, disability and sex, including sexual orientation and identity. He has represented victims of race discrimination in the denial of equal access to credit, in the rates charged for insurance and in the equal access to health clubs, retail stores, restaurants and other public places. He has challenged housing discrimination on the basis of race and the denial of housing and public accommodations to people with disabilities.

Some of the noteworthy matters he has handled include: *Walmart v. Dukes* (U.S. S.Ct.), delivered argument on behalf of class of women who alleged sex discrimination in pay and promotions in case establishing new rules governing class certification; *Randolph v. Greentree Financial* (U.S. S.Ct.), delivered argument on behalf of consumer challenging enforcement of arbitration agreement in case establishing rules governing the enforceability of arbitration agreements; *Beck. v. Boeing Company* (W.D. Wash.), co-lead counsel on behalf of class of more than 28,000 women employees alleging sex discrimination in pay and overtime decisions; *Conway, et al. v. Deutsch* (E.D. Va.), co-lead counsel on behalf of class of female covert case officers at the CIA alleging sex discrimination in promotions and job assignments; *Johnson, et al. v. Freeh* (D.D.C.), co-lead counsel on behalf of class of African-American FBI special agents alleging racial discrimination in promotion and job assignments; *Keepseagle v. Veneman* (D.D.C.), lead counsel on behalf of class of Native American farmers and ranchers alleging denial of equal access to credit by USDA; *Neal v. Director, D.C Dept. of Corrections* (D.D.C.), co-lead counsel in which he tried first sexual harassment class action to a jury, on behalf of a class of women correctional employees and women and men subject to retaliation;*Doe v. D.C. Fire Department* (D.D.C.), in which he established after trial that an applicant with HIV could properly serve as a firefighter; *Floyd-Mayers v. American Cab Co.* (D.D.C.), in which he represented persons who alleged they were denied taxi service because of their race and the race of the residents at the location to which they asked to

be driven; and *Trotter, et al. v. Perdue Farms* (D. Del.), lead counsel on behalf of chicken processing workers alleging violations of federal wage and hour and employee benefits law.

Prior to joining Cohen Milstein, Mr. Sellers served for over 15 years as the Director of the Employment Discrimination Project of the Washington Lawyers' Committee for Civil Rights and Urban Affairs, an organization providing pro bono representation in a broad range of civil rights and related poverty issues. He was a member of the transition teams of Obama/Biden in 2008 and Clinton/Gore in 1992 and 1993, and served as a Co-Chair of the Special Committee on Race and Ethnicity of the D.C. Circuit Task Force on Gender, Race and Ethnic Bias to which he was appointed by the judges of the D.C. Circuit Court of Appeals and the U.S. District Court for the District of Columbia.

Throughout his career, Mr. Sellers has also been active in legislative matters. He helped to draft and worked for the passage of the Civil Rights Act of 1991, the Americans with Disabilities Act of 1990 and the Lily Ledbetter Fair Pay Restoration Act of 2009. He has testified more than 20 times before Committees of the United States Senate and House of Representatives on various civil rights and employment matters.

A teacher and mentor, Mr. Sellers has trained lawyers at the U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice on the trial of civil rights cases, and was an Adjunct Professor at the Washington College of Law at American University, where he taught Employment Discrimination law, and at the Georgetown University Law Center, where he taught Professional Responsibility. In addition, he has lectured extensively throughout the country on various civil rights and employment topics.

Mr. Sellers has been recognized as one of the top lawyers in Washington and as one of the top plaintiffs' employment lawyers in the U.S. In 2010, *The National Law Journal* named him one of "The Decade's Most Influential Lawyers," in 2011 *The Legal Times* named him a "Legal Visionary," and in 2012 the Washington Lawyers' Committee for Civil Rights and Urban Affairs awarded him the Wiley Branton Award for leadership in civil rights. He is a professionally trained mediator and has served as the President of the Washington Council of Lawyers.

Mr. Sellers received his B.A. in American History and Literature from Brown University, and earned his J.D. from Case Western Reserve School of Law, where he served as Research Editor of the *Case Western Reserve Law Review*.

Andrew N. Friedman

Andrew N. Friedman is a Partner at Cohen Milstein, and is Co-Chair of the firm's Consumer Protection practice group. Practicing in the class action field since 1985, Mr. Friedman specializes in litigating complex, multi-state class action lawsuits against manufacturers and consumer service providers such as banks, insurers, credit card companies and others. He is widely recognized as a leader in enforcing consumer rights and known as a hands-on lawyer who is ready to take litigation all the way through trial.

Over the years, Mr. Friedman has been lead or co-lead counsel in numerous important cases, bringing relief to millions of consumers and recovering hundreds of millions of dollars in class actions. He was one of the principal counsel in cases against Nationwide and Country Life, which asserted sales marketing abuses in the marketing of so-called "vanishing premium policies," where insurance agents sold insurance policies to unsuspecting consumers promising that after a relatively short time the dividends generated from the policy would be so high as to be able to fully pay the premiums. In fact, the calculations of the policies were based on unrealistic interest rate projections and, therefore, the premiums never "vanished." The Nationwide case

resulted in a settlement valued at between $85 million and $103 million, while a settlement with Country Life made $44 million in benefits available to policyholders.

Mr. Friedman was co-lead counsel in Keithly v. Intelius, Inc. (W.D. Wash.), where he negotiated two nationwide settlements with Intelius, Inc., relating to negative option programs and improper post-transaction marketing. The combined settlements made $12 million in cash and a total of $3.5 million in vouchers available to the Class.

Mr. Friedman has also litigated important consumer product lawsuits, including one against Thomson Consumer Electronics, which resulted in a settlement that made up to $100 million available for persons who paid for unreimbursed repairs to defective televisions. In addition, Mr. Friedman was one of the principal counsel in the Dex-Cool Litigation, a nationwide lawsuit alleging that General Motors sold millions of cars with defective coolant that gummed up and caused corrosion to engines. GM settled ahead of trial, offering relief of cash payments of up to $800 per repair.

More recently, Mr. Friedman litigated a lawsuit against Symantec, Corp., and Digital River, Inc., a four-year long nationwide class action battle regarding the marketing of a re-download service in conjunction with the sale of Norton software. The case settled in a $60 million all-cash deal one month before the case was about to go to trial – one of the most significant consumer settlements in years.

Prior to his current role as Co-Chair and member of the Consumer Protection group, Mr. Friedman was a member of the Securities Litigation & Investor Protection practice, litigating many important matters, including the Globalstar Securities Litigation in which he served as one of the lead trial counsel. The case settled for $20 million during the second week of the trial. In addition, Mr. Friedman served as one of co-lead or principal counsel in Norman Frank et al. v. David L. Paul (a recovery of over $18 million); In re Jiffy Lube Securities Litigation (D. Md.) (a recovery of over $12 million); and In re Immunex Securities Litigation (W.D. Wash.) (a recovery of $14 million).

Currently, Mr. Friedman is litigating such notable matters as:

- Anthem Data Breach Litigation: Mr. Friedman is co-lead counsel in a high-profile class action lawsuit against Anthem Inc. over its massive data breach that compromised the personal identification (including social security numbers, date of birth, medical ID number, etc.) and health information of 80 million insured customers. The lawsuit alleges Anthem, the second-largest insurance company in the nation, failed to ensure its data systems were protected, failed to prevent and stop the breach from happening and failed to disclose to its customers material facts regarding the breach. Mr. Friedman is involved in all aspects of the litigation.

- Sallie Mae Litigation: Cohen Milstein is co-lead counsel in a series of cases alleging that Sallie Mae charged usurious interest rates and improper late fees to California students. Mr. Friedman is overseeing all aspects of the litigation.

- Home Depot Data Breach Litigation: Mr. Friedman is a member of the Plaintiffs' Steering Committee representing financial institutions and heads the expert committee in a class action lawsuit arising out of the Home Depot data breach, a cyber attack that affected hundreds of financial institutions and more than 40 million consumers.

Mr. Friedman is a noted speaker who has appeared on numerous panels for legal education seminars and institutional investor conferences on the issues of consumer and securities class actions. In 2011, LawDragon named him one of the Leading Plaintiffs' Lawyers. His work has been cited in the media and he was profiled in the April 14, 2000, Washington Business Journal.

Prior to joining Cohen Milstein, Mr. Friedman served as an attorney with the U.S. Patent and Trademark Office.

Mr. Friedman attended Tufts University, graduating magna cum laude and was elected Phi Beta Kappa, with a B.A. in Psychology. He earned his J.D. from the National Law Center, George Washington University.

Daniel S. Sommers

Daniel S. Sommers is a Partner at Cohen Milstein, a member of the firm's Executive Committee and Co-Chair of the Securities Litigation & Investor Protection practice group. During his nearly three decade career at Cohen Milstein, Mr. Sommers has taken leadership roles in litigating large, complex and significant securities cases. He provides litigation counsel to the firm's institutional investor clients, including for example, the New York State Common Retirement Fund, the Ohio Public Employees Retirement System, the State Teachers Retirement System of Ohio, the Arkansas Public Employees Retirement System and numerous Taft-Hartley pension funds. Many of his cases have resulted in important rulings and legal precedents, as well as in significant recoveries for investors totaling hundreds of millions of dollars. Some of his notable matters include:

- *Bear Stearns Mortgage Pass Through Securities Litigation*: Co-lead counsel in a $505 million landmark settlement (including a $5 million expense fund) of a securities class action suit alleging that Bear Stearns violated securities laws in the sale of mortgage backed securities to investors. This case represents the largest recovery ever obtained in a securities class action on behalf of investors in mortgage-backed securities.
- *Converium/Scor Securities Litigation* (Netherlands): Co-lead counsel in a groundbreaking $58.4 million securities class action recovery, in which the Amsterdam Court of Appeal declared binding a world-wide class action settlement of claims of non-U.S. investors who purchased Converium shares outside of the United States. The ruling was a major victory for worldwide investors because it successfully implemented the Dutch Collective Settlement Statute even though the underlying transactions had limited contact with the Netherlands.
- *Fannie Mae Securities Litigation*: Played a significant role in a high profile securities class action against Fannie Mae, several of its former executives and KPMG involving allegations of falsified financial statements. The $153 million settlement amount represents the largest recovery in a securities fraud class action ever obtained in the United States District Court for the District of Columbia.
- *CP Ships Ltd. Securities Litigation*: Co-lead counsel in a class action lawsuit alleging that CP Ships, a Canadian company headquartered in England but with substantial operations in Tampa, Florida, issued false financial statements. Mr. Sommers argued an appeal in the U.S. Court of Appeals for the Eleventh Circuit, successfully opposing objections to a settlement that provided non-U.S. investors with the protections of the federal securities laws.
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Mr. Sommers has obtained significant recoveries for investors in numerous other securities class action cases in federal courts throughout the United States including: *Steiner v. Southmark Corporation* (N.D. Tex.) (over $70 million recovery); *In re PictureTel Inc. Securities Litigation* (D. Mass.) ($12 million recovery); *In re Physician*

Corporation of America Securities Litigation (S.D. Fla.) ($10.2 million recovery); *In re Gilat Satellite Securities Litigation* (E.D.N.Y.) ($20 million recovery); *In re Pozen Inc. Securities Litigation* (M.D.N.C.) ($11.2 million recovery); *In re Nextel Communications Securities Litigation* (D.N.J.) (up to $27 million recovery); *In re PSINet Inc. Securities Litigation* (E.D. Va.) ($17.8 million recovery); *In re Cascade International Inc. Securities Litigation*, (S.D. Fla.) (global recovery of approximately $10 million); *In re GT Solar Securities Litigation* (D.N.H.) (recovery of $10.5 million);*Mulligan v. Impax Laboratories, Inc.* (E.D. Va.) (recovery of $8 million); *Plumbers & Pipefitters National Pension Fund v. Orthofix, N.V.* (S.D.N.Y) (recovery of $11 million) and *In re ECI Telecom Securities Ltd. Litigation* (E.D. Va.) ($21.75 million recovery). He has also handled significant appellate matters including arguing before the United States Court of Appeals for the Ninth Circuit in *Hemmer Group v. Southwest Water Company*, where he obtained a reversal of the district court's order dismissing investors' claims under the Securities Act of 1933. In addition, he was co-lead counsel for investors before the United States Supreme Court in *Broudo v. Dura Pharmaceuticals, Inc*., 544 U.S. 336 (2005) (addressing the standards for pleading loss causation).

Mr. Sommers is also experienced in non-class action litigation. He represented TBG Inc., a multi-billion dollar privately-held overseas corporation, in a multi-party, complex action alleging fraud in a corporate acquisition and represented individuals in connection with investigations brought by the United States Securities and Exchange Commission. He also has represented publicly traded corporations in the prosecution and defense of claims. Mr. Sommers has litigated cases covering a wide-range of industries including the financial services, computer software, pharmaceutical, insurance, real estate and telecommunications industries among others. In addition, he has substantial experience in cases presenting complex accounting and auditing issues.

Mr. Sommers is recognized as a thought leader on the subjects of securities and class action litigation and is a frequent speaker on those topics both to other lawyers and institutional investors. He has been quoted on these topics in a variety of publications, such as *The Wall Street Journal*, *The Washington Post*, *BNA/Bloomberg*, and *Law360*. Mr. Sommers is a member of the advisory board of the *Bloomberg/BNA Securities Litigation & Law Report* and served on Law360's Securities Editorial Advisory Board. *Benchmark Plaintiff* has recognized him as a litigation star in multiple years. He has been named a Washington, D.C. Super Lawyer each year from 2011 through 2016, and has been awarded Martindale-Hubbell's highest rating of AV Preeminent®. He served as Chairman and Vice-Chairman of the Investor Rights Committee of the Corporation, Finance and Securities Law Section, District of Columbia Bar, and through the years has been a guest lecturer at Columbus School of Law at the Catholic University of America; Georgetown Law Center; and George Washington University Law School.

Mr. Sommers attended Union College, where he earned a B.A. *magna cum laude* in Political Science, and graduated from George Washington University Law School.

Daniel A. Small

Daniel A. Small has been a Partner at Cohen Milstein for more than 20 years and chaired or co-chaired the firm's Antitrust practice group from 2008 to 2014. He is a member of the firm's Executive Committee.

When he arrived at Cohen Milstein 26 years ago, Mr. Small was assigned to work on securities fraud cases. One year later, he received an assignment in an antitrust case and has worked virtually full time on antitrust cases ever since. He has represented plaintiff classes as lead or co-lead counsel numerous times and has tried cases before juries and has argued cases in several appellate courts, including the United States Supreme

Court. He also has defended unions against antitrust claims and represented a key duplication machine manufacturer on its monopolization claims against the dominant competitor.

Mr. Small has obtained favorable settlements and judgments totaling hundreds of millions of dollars and has been involved with a broad array of markets, everything from computer software and hardware to wild blueberries and hospital nurses. He has developed a sophisticated understanding of how conspiracies and monopolies operate in a range of complex markets. He has spent years studying the economic issues that underpin his cases, and the challenges of using antitrust litigation to achieve just compensation for victims, and to encourage and facilitate freer and more open markets in this country.

His work in complex civil litigation has made him one of the most respected and feared litigants in the class action antitrust space: *The Legal 500* has recognized Mr. Small and Cohen Milstein as a "Leading Plaintiffs Antitrust Class Action Lawyer/Firm" annually since 2009; *Benchmark Plaintiff* has repeatedly awarded him "National Litigation Star – Antitrust"; and in 2014, he was named a "Leading Competition Lawyer" by the *International Who's Who of Competition Lawyers & Economists*.

Currently, Mr. Small is litigating the following notable matters, among others:

- VFX/Animation Workers Litigation: Cohen Milstein is one of three court-appointed co-lead firms in litigation alleging that the major animation studios conspired to suppress the pay of special effects and animation workers. The litigation has survived a motion to dismiss and the plaintiffs recently filed a motion for class certification.
- Prime Healthcare Services Litigation: Cohen Milstein is defending the Service Employees International Union (SEIU) in an antitrust conspiracy action brought by Prime Healthcare Services, a hospital chain in Southern California, alleging that SEIU conspired with Kaiser Permanente to drive Prime and certain other hospitals out of the market. Cohen Milstein led the successful effort to have the complaint and amended complaint dismissed in the Southern District of California. The case is on appeal in the Ninth Circuit where Mr. Small recently argued on behalf of the SEIU and its local union, UHW.
- Google Wi-Fi Litigation: Cohen Milstein is co-lead counsel in a nationwide class action lawsuit alleging Google violated the Wiretap Act when its Street View vehicles collected payload data from unencrypted Wi-Fi networks, including the home networks of individuals. The litigation survived a motion to dismiss, which was affirmed on an interlocutory appeal to the Ninth Circuit. Currently, the firm is in the midst of jurisdictional discovery.
- Michigan Blue Cross Litigation: Cohen Milstein is co-lead counsel in this class action challenging Michigan Blue Cross's use of most favored nation provisions in its provider agreements with hospitals in Michigan. The class plaintiffs secured a $30 million settlement, which was approved by the United States District Court for the Eastern District of Michigan. Mr. Small defended the settlement on appeal, arguing recently before the Sixth Circuit Court of Appeals.
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Past successes include:

- In re Buspirone Antitrust Litigation: $90 million settlement. Cohen Milstein served as co-lead counsel in a class action lawsuit alleging that Bristol Myers-Squibb Co., the manufacturer of the prescription drug Buspar, conspired to keep generic versions of the drug out of the market.
- *Pease v. Jasper Wyman & Son, et al.:* $56 million judgment. Cohen Milstein was lead counsel representing a class of wild blueberry growers in Maine who sued four blueberry processors for

conspiring to depress blueberry prices. The litigation was tried before a jury in Maine state court, where Mr. Small was co-lead trial counsel. The jury found the processors liable for 100% of the damages estimated by the plaintiffs' expert and awarded the growers $18.68 million in damages, which was trebled under Maine antitrust law.

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Mr. Small attended Colgate University, where he graduated with a B.A., *cum laude*, in History. He earned his J.D. at American University's Washington College of Law. Following law school, Mr. Small clerked for the Honorable Judge Roger Vinson, United States District Court for the Northern District of Florida, from 1986 to 1988. He serves on the Advisory Board of the American Antitrust Institute and is chair of the selection committee for the annual Jerry S. Cohen Memorial Writing Award for Antitrust Scholarship.

Christine E. Webber

Christine E. Webber is a Partner at Cohen Milstein, and a member of the Civil Rights & Employment practice group. In that role, Ms. Webber represents victims of discrimination and other illegal employment practices in class and collective actions. She has participated during her career in litigating groundbreaking sex discrimination lawsuits. Ms. Webber is a hands-on litigator, known for her ability to work closely with economic and statistical expert witnesses and to identify the types of sophisticated statistical analyses that will be most helpful to her clients' claims.

Ms. Webber is a tenacious and resourceful litigator with a fierce commitment to fighting discrimination and protecting workers. In the face of adversity she continues to find new ways to protect her clients' rights. Following the Supreme Court's ruling decertifying the class in *Dukes v. Wal-Mart*—a case brought on behalf of a nationwide class of women suing Wal-Mart for sex discrimination in pay and promotion—Ms. Webber has been counsel in several regional class cases pursuing these claims for former Dukes class members. Ms. Webber was co-lead counsel in*Rindfleisch v. Gentiva Health Services* (N.D. Ga.) in which nurses and other home health care providers were held to be non-exempt because they were not paid on a bona fide salaried or fee basis. Following this successful summary judgment ruling, the case was decertified, and Ms. Webber continues to represent individuals seeking their unpaid overtime. In *Tomkins v. Amedisys, Inc.,* a lawsuit challenging similar practices as the Gentiva litigation, Ms. Webber represented approximately 2,000 nurses, physical therapists and occupational therapists pursuing wage and hour claims against Amedisys; the case settled recently for $8 million.

Ms. Webber's past successes include *In re Tyson Foods FLSA MDL* (M.D. Ga.), a collective action involving Fair Labor Standards Act (FLSA) claims at over 40 Tyson chicken processing plants, which ultimately resolved the claims of 17,000 chicken processing workers who had been denied compensation for donning and doffing required safety and sanitary equipment. In *Hnot v. Willis Group Insurance* (S.D.N.Y.), Ms. Webber represented a class of women vice presidents in Willis' Northeast region, who complained of discrimination with respect to their salary and bonuses. This "glass ceiling" case settled in 2007 for $8.5 million plus attorneys' fees, an average payment of $50,000 per woman. A subsequent case, *Cronas v. Willis Group*, pursued similar claims for a later time period with similar success. Ms. Webber was also counsel to the plaintiff class in *Keepseagle v. Vilsack*, a historic settlement between Native American farmers and the United States Department of Agriculture (USDA). The *Keepseagle* settlement agreement required the USDA to pay $680 million in damages to thousands of Native Americans, to forgive up to $80 million in outstanding farm loan debt and to improve the farm loan services the USDA provides to Native Americans. Ms. Webber was part of the team recognized by Public Justice as finalists for their Trial Lawyer of the Year award in 2011 for the work done in *Keepseagle*.

Prior to joining Cohen Milstein in 1997, Ms. Webber received a Women's Law and Public Policy fellowship which funded the first of her four years at the Washington Lawyers' Committee for Civil Rights and Urban Affairs in their Equal Employment Opportunity Project. There, she worked on employment discrimination cases, focusing in particular on the sexual harassment class action *Neal v. Director, D.C. Department of Corrections, et al.* Ms. Webber participated in the trial of this groundbreaking sexual harassment class action in 1995. Ms. Webber also tried the race discrimination case *Cooper v. Paychex* (E.D. Va.), and successfully defended the plaintiffs' verdict before the Fourth Circuit.

Ms. Webber is co-chair of the National Employment Lawyers' Association's Class Action Committee, a position she has held since 1999. She speaks and writes frequently on employment discrimination, wage and hour issues, and class actions.

Ms. Webber attended Harvard University, graduating *magna cum laude*, with an A.B. in Government, and earned her J.D., *magna cum laude*, Order of the Coif, at the University of Michigan Law School. Following law school, she clerked for the Honorable Hubert L. Will, United States District Judge for the Northern District of Illinois.

Richard A. Koffman

Richard A. Koffman is a Partner at Cohen Milstein and Co-Chair of the Antitrust practice group. He litigates antitrust cases on behalf of the victims of corporations engaged in price-fixing, market monopolization, and other unlawful conduct. Mr. Koffman joined Cohen Milstein after serving as Senior Trial Attorney in the U.S. Department of Justice's Antitrust and Civil Rights Divisions. He views his role in litigating antitrust suits as an extension of the public interest work he pursued at the DOJ in promoting competition and fighting discrimination.

Mr. Koffman has served as lead or co-lead counsel in many landmark antitrust class actions, including:

- Urethanes (Polyether Polyols) Antitrust Litigation: Co-lead counsel for plaintiffs in an antitrust class action alleging a conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants settled pre-trial for a total of $139 million. After a four-week trial, the jury returned a $400 million verdict for plaintiffs against the final defendant, The Dow Chemical Co., which the district court trebled to more than $1 billion. Dow ultimately settled for $835 million while the case was on appeal, bringing the total recovery to $974 million – nearly 250% of the damages found by the jury.
- Plasma-Derivative Protein Therapies Antitrust Litigation: Co-lead counsel for plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin – life-saving therapies derived from blood plasma. Mr. Koffman and his team obtained settlements totaling $128 million to compensate customers who were overcharged for these vital therapies.
- Polyester Staple Antitrust Litigation: Co-lead counsel for plaintiffs alleging a conspiracy to fix prices for polyester staple fiber; the case settled for $46 million.

Current cases include:

- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company – the three largest dental

supply and dental equipment distributors in the United States – fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays.

- Sports Broadcasting Antitrust Litigation: Counsel for plaintiffs in class actions alleging that the system of geographical broadcasting territories employed by Major League Baseball and the National Hockey League amount to unlawful market allocation under Section 1 of the Sherman Act.
- Mixed Martial Arts (MMA) Antitrust Litigation: Co-lead counsel in a class action on behalf of elite MMA fighters alleging that Zuffa LLC – commonly known as the Ultimate Fighting Championship – has unlawfully monopolized the markets for promoting live professional MMA bouts and for purchasing the services of elite professional MMA fighters. The district court denied defendant's motion to dismiss the case in September 2015.
- *People of the State of California v. American Express:* Counsel for the City of San Francisco in litigation alleging that American Express, by prohibiting its participating merchants from encouraging consumers' use of less costly payment methods (including debit cards and cash), is responsible for unlawful overcharges borne by retailers and, indirectly, all California consumers.

The Legal 500 has recognized Mr. Koffman as a Leading Lawyer for "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust" for five years in a row, describing him as a "strong brief writer and an excellent oral advocate." Mr. Koffman was also named as one of the world's leading competition lawyers by Global Competition Review in the U.S. Plaintiffs section of *Who's Who Legal: Competition 2016*.

Mr. Koffman attended Wesleyan University, where he received a B.A. with honors, and is a graduate of Yale Law School, where he was Senior Editor of the *Yale Law Journal*. After law school, Mr. Koffman served as a law clerk to two Federal Judges: James B. McMillan, of the U.S. District Court for the Western District of North Carolina and Anthony J. Scirica of the U.S. Court of Appeals for the Third Circuit.

Agnieszka Fryszman

Agnieszka Fryszman is a Partner at Cohen Milstein, and is Chair of the firm's Human Rights practice group. She has been recognized as leading one of the best private international human rights practices in the world.

Ms. Fryzman represents individuals who have been victims of torture, human trafficking, forced and slave labor and other violations of international law. A recognized expert and leader in the field of human rights law, Ms. Fryszman regularly litigates cases against corporate giants. She was a member of the legal team that successfully represented survivors of Nazi-era forced and slave labor against the German and Austrian companies that allegedly profited from their labor. These cases were resolved by international negotiations that resulted in multi-billion dollar settlements. She also represented, pro bono, Holocaust survivors suing Swiss banks that collaborated with the Nazi regime during World War II. This litigation led academics to revise their assessment of Switzerland's relationship with Nazi Germany and exposed the extent of business participation in the Holocaust.

Ms. Fryszman earned the *National Law Journal* Pro Bono Award for efforts on behalf of Nepali laborers injured or killed at U.S. military bases in Iraq and Afghanistan. Her team obtained several judgments and significant settlements on behalf of the families.

In addition, she currently represents victims of a human trafficking ring that allegedly lured men from Nepal with the promise of employment at luxury hotels, but instead took them against their will to work for U.S. military contractors in Iraq. Ms. Fryszman investigated and initiated suit against military contractor KBR, filing one of the first complaints under the Trafficking Victims Protection Act. She has also represented men and women who were trafficked by diplomats, in the fishing industry, and to work cleaning houses in Northern Virginia. In one recent case, after Ms. Fryszman obtained a full recovery for her client in a civil suit, the Department of Justice brought criminal charges, resulting in guilty pleas by the perpetrators. Her work on behalf of the former "comfort women," women and girls trafficked into sexual slavery by the government of Japan during World War II, was recognized with the "Fierce Sister" award from the National Asian Pacific American Women's Forum.

Ms. Fryszman represented, pro bono, victims of the September 11 attack on the Pentagon and obtained one of the highest awards for an injured survivor from the Victim's Compensation Fund. Ms. Fryszman also represented, pro bono, two individuals detained by the United States at Guantanamo Bay who were ultimately cleared without charge.

Prior to joining Cohen Milstein in 1998, Ms. Fryszman served as counsel to the United States House of Representatives Committee on the Judiciary, Subcommittee on Commercial and Administrative Law, and before that counsel to Representative Henry Waxman, Ranking Member on the House Government Reform and Oversight Committee. Earlier in her career, she was legislative director to U.S. Representative Jack Reed.
Ms. Fryszman has received some of the legal profession's highest honors. Since 2009, LawDragon 500 has named her perennially to its list of Leading Lawyers in America. *Benchmark Plaintiff* has named her a Leading Star Plaintiffs' Litigator and one of the Top 150 Women in Litigation. For her pro bono work, she was awarded the Beacon of Justice Award by the National Legal Aid and Defender Association and the Frederick Douglass Human Rights Award from the Southern Center for Human Rights. She was also a finalist for the Public Justice Foundation's Trial Lawyer of the Year Award for her work on *Wiwa v. Royal Dutch Shell*. Ms. Fryszman joined the legal team in that case to prepare it for trial, resulting in a multi-million dollar settlement on the morning of jury selection.

Ms. Fryszman graduated from Brown University with an A.B. in International Relations, and earned her law degree from Georgetown University, graduating *magna cum laude*, Order of the Coif. At law school, she was a Public Interest Law Scholar.

Julie Goldsmith Reiser

Julie Goldsmith Reiser is a Partner at Cohen Milstein, and a member of the Securities Litigation Investor Protection Practice Group. Ms. Reiser's practice focuses on representing public pension plans and other institutional investors in high-stakes securities litigation.

Known for her hands-on approach, strong advocacy and critical thinking, Ms. Reiser has led successful litigation teams in several complex actions, including a $500 million settlement related to Countrywide's issuance of mortgage-backed securities ("MBS") and the recent Fifth Circuit affirmation of an investor class in

the BP securities fraud litigation stemming from the 2010 Deepwater Horizon oil spill. In those cases, Ms. Reiser's clients have benefited from her oral and written advocacy, her judgment, and her ability to work tirelessly and collegially as a member of a litigation team. Over the years, Ms. Reiser has become a recognized leader in the securities plaintiffs' bar, demonstrating a keen understanding of complex financial and economic issues and using her intuition and strategic thinking to develop strong legal theories that align with the evidence.

Currently, Ms. Reiser is litigating the following notable matters:

In re BP Securities Litigation: Ms. Reiser represents the New York State Common Retirement Fund as co-lead plaintiff in a securities class action filed in 2010, alleging that BP injured investors by intentionally downplaying the severity of the Deepwater Horizon oil spill and preventing investors from learning the magnitude of the disaster. Ms. Reiser has taken the lead in all aspects of this litigation: case development, motion practice, oversight and implementation of discovery strategies, depositions, expert discovery and argument. After successfully arguing for class certification to the district court, Ms. Reiser presented plaintiffs' defense of that court's decision to the Fifth Circuit U.S. Court of Appeals, which affirmed the class. Trial in this matter is set for July 2016.

Countrywide Mortgage Backed Securities Litigation: Ms. Reiser represented the Iowa, Oregon and Orange County public retirement systems in class action litigation related to Countrywide's issuance of mortgage-backed securities, which culminated in a landmark $500 million settlement. Over the course of the litigation, Ms. Reiser argued on investors' behalf at the motion to dismiss stage. She also handled various arguments related to discovery disputes, and oversaw merits and expert discovery. She took a majority of the fact depositions and was recognized for having teased a number of salient points from witnesses during the depositions. Ms. Reiser also took the lead in working with experts to maximize damages. The case is ongoing.

Ms. Reiser's successes include:

Policemen's Annuity and Benefit Fund of the City of Chicago, et al. v. Bank of America, NA, et al.: Ms. Reiser developed and litigated this novel class action, challenging trustee inaction in preventing investor losses. She represented the Arkansas Public Employees Retirement System, IPERS and Chicago Laborers in the case, which settled for $69 million. Ms. Reiser worked with plaintiffs' statistician to develop a sampling methodology for testing whether mortgages were underwritten properly and with plaintiffs' economist in the bid for class certification and approach to damages. At the final hearing, Judge Katherine B. Forrest commended the investors' legal team: "This is a very, very good result for the plaintiffs … [and] is something of which plaintiff counsel can be proud."

In re SCOR Holding (Switzerland) Securities Litigation: Ms. Reiser served as co-lead counsel in this landmark ruling, which was the first trans-Atlantic resolution of a U.S. securities class action in a Dutch court. The ruling made it easier for U.S. and European investors to use Dutch law in the future to protect their interests. Ms. Reiser helped secure a $140 million settlement.

In re Parmalat Securities Litigation: Ms. Reiser acted as co-lead counsel representing investors in the largest fraud in European corporate history. Ms. Reiser secured a $90 million settlement.

In addition, Ms. Reiser has represented plaintiffs in employment cases. In Wade v. Kroger (W.D. Ky.), she represented African American employees who received a $16 million settlement to resolve claims that the retailer Kroger had discriminated against them in pay and promotions. She was also involved in Beck v. The Boeing Co. (W. D. Wash.), a case alleging sex discrimination in compensation and promotions that settled for $72.5 million.

Ms. Reiser is a noted speaker, often called on to discuss important issues such as the class standing doctrine. Ms. Reiser is the author of "Pre-Dispute Arbitration Clauses: Taking the Alternative Out of Dispute Resolution," Bloomberg BNA, Class Action Litigation Report, December 11, 2015. After its publication, Paul Bland, Executive Director of Public Justice wrote: "This is invaluable advocacy that takes industry-side advocacy and exposes its flaws and failings. I'm very glad to see this kind of very high quality advocacy and critical thinking."

Ms. Reiser also is the co-author of "Omnicare: Negligence is the New Strict Liability When Pleading Omissions Under the Securities Act," Bloomberg BNA, Corporate Law & Accountability Report, April 10, 2015; the author of "Dodd Frank's Protections for Senior Citizens: An Important, Yet Insufficient Step," University of Cincinnati Law Review, Volume 81, Issue 2, May 30, 2013; "Why Courts Should Favor Certification of MBS Actions," ABA Securities Litigation Journal, Volume 22, Number 1, Fall 2011; and the co-author of "The Misapplication of American Pipe Tolling Principles," ABA Securities Litigation Journal, Volume 21, Number 2, Winter 2011. She also co-authored Opt-Outs: Making Private Enforcement of the Securities Laws Even Better, featured in the Winter/Spring 2008 edition of the ABA's Class Action and Derivative Suit Committee Newsletter and Companies in the Cross Hairs: When Plaintiffs Lawyers Choose Their Targets, They Look for These Employment Practices, The Legal Times, February 21, 2005.

Ms. Reiser attended Vassar College, graduating with honors, and earned her J.D. at the University of Virginia School of Law. She has served as a board member at Seattle Works and the Pacific Northwest Ballet.

Theodore J. Leopold

Theodore J. Leopold is a Partner at Cohen Milstein, and a member of the firm's Executive Committee. Mr. Leopold, who joined the Firm in 2014, is Chair of the Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practices and Co-Chair of the Consumer Protection practice.

Mr. Leopold's practice is devoted solely to trial work, with a focus on complex product liability, managed care abuse, consumer class actions and catastrophic injury and wrongful death litigation. Mr. Leopold has tried cases throughout the country and has recovered multi-million dollar verdicts, including jury verdicts in the eight-figure and nine-figure amounts.

In his role, Mr. Leopold litigates high-stakes, complex lawsuits on behalf of consumer safety issues, particularly as it relates to product defects, automobile safety and managed care matters. In 2010, he obtained a $131 million jury verdict against the Ford Motor Company, the ninth-largest verdict against an automobile company in U.S. history.

Mr. Leopold was on the steering committee in the National Managed Care Class Action and the Plaintiffs' settlement committee for the Ford/Firestone National Class Action. Currently, he serves on the Plaintiffs' trial team in the Rail Freight Fuel Surcharge Antitrust Litigation, as lead counsel in the HCA Class Action and as co-lead counsel in the Red Light Class Action.

Currently, Mr. Leopold is litigating the following notable matters:

- HCA: Mr. Leopold is lead counsel in a class action lawsuit alleging that two Florida women and others like them were billed inflated and exorbitant fees for emergency radiology services covered in part by their Florida Personal Injury Protection (PIP) insurance. Mr. Leopold is lead attorney in the litigation charging HCA hospitals with gouging patients with PIP coverage. The case is ongoing.
- United States of America, et al. v. AIDS Healthcare Foundation, Inc.*:* Mr. Leopold represents relators in a Qui Tam matter involving the anti-kickback statute. The lawsuit alleges that the AIDS Healthcare Foundation, the nation's largest provider of HIV/AIDS medical care, improperly payed illegal kickbacks for patient referrals, and then fraudulently billed government healthcare programs. The case is ongoing.
- *Carrier v. Trinity:* Mr. Leopold represents the Carrier family in this wrongful death matter. The death occurred as a result of the guardrail safety device failing. Instead of protecting the driver, the guardrail intruded into the passenger compartment of the vehicle and impaling the driver, causing her death. The case is ongoing.

Examples of some of Mr. Leopold's litigation successes are:

- *Mincey v. Takata:* Mr. Leopold was the lead attorney in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic when the driver's side airbag deployed too aggressively during a vehicle collision. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia. The suit charged that the Takata Corporation, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by Mr. Leopold showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016.
- Caterpillar Antitrust Litigation: Mr. Leopold was co-lead counsel in a class action lawsuit alleging Caterpillar sold diesel engines with defective exhaust emissions system that resulted in power losses and shutdowns. Mr. Leopold developed the case and led all aspects of the litigation.
- *Cole v. Ford Co.:* Mr. Leopold was co-trial attorney for the family of former New York Mets infielder Brian Cole who was killed when the Ford Explorer he was in rolled over and he was ejected from his seat. The lawsuit charged that the defective seat belt in his Ford Explorer failed to keep him in his seat. Following a trial jury the jury found for the Cole family in the amount of $131 million.
- *Quinlan v. Toyota Motor Corporation:* Mr. Leopold was lead counsel in a product liability case filed against Toyota Motor, alleging that manufacturing defects in the defendant's car caused the car being driven by the plaintiff Quinlan to suddenly accelerate and go out of control, resulting in catastrophic injuries that left him a quadriplegic. The defendant entered into a settlement, which is confidential.
- *Chipps v. Humana:* Mr. Leopold tried one of the first managed care cases in the country. The case involved the wrongful denial of physical and occupational therapy for a 6 year old child with cerebral palsy. The jury returned the largest punitive damage award on behalf of an individual in Florida history.
- *Salvato v. Marion County Sherriff:* Mr. Leopold represented the Salvato family in the wrongful death case of Joshua Salvato, an unarmed 21-year-old, who was shot and killed by two Marion County Sherriff's deputies in 2014. The jury verdict returned restitution in the amount of $2.3 million, charging one deputy with excess force and the other for willfully inflicting suffering on Mr. Salvato.

Mr. Leopold is the past president of Public Justice, a national organization headquartered in Washington, D.C. that fights for justice through precedent-setting and socially significant individual and class action litigation. He is consistently recognized by leading publications such as *Super Lawyers* and *The Best Lawyers in America*. In addition, he has been nominated for "Trial Lawyer of the Year" by the Public Justice Foundation for his ground breaking litigation involving the managed care industry, and his work has been featured in the National Law Journal's "Top Verdicts of the Year."

Mr. Leopold lectures frequently at professional gatherings on such issues as personal injury, product liability, class action litigation, trial tactics and consumer justice. He is also author and co-author of several legal publications, including Florida Insurance Law and Practice (Thomson/West). Additionally, Mr. Leopold has earned the Florida Bar Civil Trial Certification, the highest level of recognition by the Florida Bar for competency and experience within civil trial law.

Mr. Leopold is a graduate of University of Miami, where he received a B.A., and earned his J.D. from Cumberland School of Law, Samford University.

Carol V. Gilden

Carol V. Gilden is a Partner in the Securities Litigation & Investor Protection Practice Group at Cohen Milstein. She represents public pension funds, Taft-Hartley pension and health and welfare funds, and other institutional investors in securities class actions, transaction and derivative litigation, and individual actions, as well as in foreign securities litigation. She also litigates other types of complex litigation matters and class action cases in state and federal courts nationwide.

Ms. Gilden began her career at the Securities and Exchange Commission (SEC), in the Enforcement Division, spending five years investigating and litigating cases involving securities fraud. Prior to joining Cohen Milstein in 2007, Ms. Gilden served as the head of the securities class action practice at a prominent mid-sized Chicago law firm and the vice chair of its class action department. Ms. Gilden's guiding principle is that those who commit fraud on the financial markets should be held accountable. She is a strong advocate for investors and pension funds who have been defrauded by deceptive practices that permeate the financial markets. Her special focus is on complex litigation calling for strategic thinking, tenacity and the ability to persevere through the many stages of litigation. Over the course of her 30-year career in the profession, she has successfully litigated and worked on cases that have resulted in aggregate recoveries in excess of several billion dollars for investors.

Ms. Gilden is an accomplished litigator, with extensive experience handling all phases in a case, including investigative, motion practice (lead plaintiff motions, motions to dismiss, class certification and summary judgment), discovery (fact and expert), oral argument, appeal, and settlement negotiations. She has been lead and co-lead counsel in many notable matters, including the *MF Global* litigation ($90 million settlement), a precedent–setting case in which the U.S. Court of Appeals for the Second Circuit sided with the plaintiffs and held that companies cannot make false or misleading statements in their offering documents, and then hide behind risk disclosures related to those facts in their attempt to escape liability. The National Law Journal singled out Ms. Gilden's work on the case in connection with its selection of Cohen Milstein as a Hot Plaintiffs' Firm for that year.

Another notable case in which Ms. Gilden served as lead counsel, the *IntraLinks* Litigation, was one of the first

securities class actions to be certified following the Supreme Court's decision in Halliburton II. That case was successfully resolved for $14 million. Other recent cases that she has led and which have been successfully resolved, include the *Huron* Securities Litigation ($40 million settlement, the *ITT Securities Litigation* ($16.96 million settlement) and In re RehabCare Group, Inc. Shareholders Litigation, where Ms. Gilden was co-lead counsel and settled the case for a cash payment to shareholders and significant deal reforms including enhanced disclosures and an amended merger agreement.

Ms. Gilden has been on the Executive Committee of other high-profile cases, including the Global Crossing Securities Litigation (settlements of $448 million) and the Merrill Lynch Analyst cases ($125 million settlement), as well as on the litigation team of the Waste Management Litigation ($220 million settlement). Under her leadership, her former firm was an active member of the litigation teams in the *AOL Time Warner Securities litigation* ($2.5 billion settlement), *CMS Securities Litigation* ($200 million settlement) and the *Salomon Analyst Litigation/In re AT&T* ($75 million settlement). Further, Ms. Gilden was lead counsel in an opt-out securities litigation action in connection with the McKesson/HBOC merger, *Pacha, et al. v. McKesson Corporation, et al.*, which settled for a substantial, confidential sum.

Ms. Gilden has earned the trust of her clients who know she will go to the mat for them, from start to finish in their cases. She draws respect from colleagues as well as adversaries who perennially have placed her in the highest ranks of the profession, including being named an Illinois Super Lawyer repeatedly over the last 10 years, "Pension Fund Attorney of the Year, Illinois" by the Global Corporate International Magazine in 2014 and 2015 and being recognized for Excellence in Law by the Worldwide Registry. She has been featured on the cover of the Chicago Lawyer in connection with a feature article on securities class actions. She is a much sought-after speaker at legal and pension fund conferences and has been frequently quoted in the national media on market scandals, recent developments and trends in securities law and high profile securities fraud cases.

Ms. Gilden is currently representing the Chicago Public School Teachers' Pension Fund, along with other institutions, in a high profile lawsuit charging 12 Wall Street banks with conspiring to engineer and maintain a collusive and anti-competitive stranglehold over the market for interest rate swaps in violation of the antitrust laws—an action that harms investors in one of the world's biggest financial markets. She also is representing the Cleveland Bakers and Teamsters Pension and Health and Welfare Funds and other institutions in another, high profile antitrust action alleging that two dozen financial institutions with an inside role at the auction for United States Treasuries conspired to manipulate yields and prices to their own benefit.

In addition, Ms. Gilden serves as co-lead counsel in *City of Chicago v. Hotels.com, et al*, a high-profile and much-watched lawsuit in Cook County Circuit Court, alleging that online travel companies, Expedia, Hotels.com, Orbitz, Priceline and Travelocity failed to properly remit hotel taxes to the City of Chicago for hotel bookings. Ms. Gilden has argued and won numerous motions at the trial level on behalf of the City of Chicago, including the parties' cross motions for summary judgment, which involved six days of argument on liability and another half day of argument on damages. Settlements have been obtained from three of the four defendant groups. A judgment has been entered in the case on behalf of the City of Chicago for approximately $29 million against the remaining defendant group, Expedia. The case is currently on appeal.

Ms. Gilden served as the first (and to this day, only) woman President of the National Association of Shareholder and Consumer Attorneys, the preeminent trade association for securities class action attorneys, as well as the organization's first woman Treasurer. As President of NASCAT, Ms. Gilden made repeated visits

to Capitol Hill advocating for strong investor protection. . She also engaged in outreach to the institutional investor community on needed reforms to reverse the erosion of investor rights. Under Ms. Gilden's leadership, NASCAT also filed amicus briefs in connection with major securities cases before the Supreme Court and other courts. Prior to becoming President, she served as the President-Elect. She continues to serve on NASCAT's Executive Committee.

Ms. Gilden was selected to serve on the Corporate Governance and Markets Advisory Councils to the Board of Directors for the Council for Institutional Investors (CII) during 2013-2015. CII is a nonprofit association of pension and other employee benefits funds, endowments and foundations and a voice for effective corporate governance and strong shareholder rights.

Ms. Gilden regularly lectures at legal conferences around the country on securities litigation and class action law, and is a frequent speaker at institutional investor conferences and symposiums regarding securities law developments, shareholder rights and regulatory reform. She has authored and co-authored numerous scholarly articles and course materials on securities fraud cases, class actions, derivative litigation and related topics.

Ms. Gilden attended the University of Illinois, earning a B.S. in Business Administration, and received her J.D. from Chicago-Kent College of Law, where she graduated with honors and was a member of the *Chicago-Kent Law Review*.

Kit A. Pierson

Kit A. Pierson is a Partner at Cohen Milstein and Co-chair of the firm's Antitrust Practice Group, as well as Co-Chair of the Pro Bono Committee. Under his leadership, the Legal 500 has recognized Cohen Milstein as a Leading Plaintiff Class Action Firm for seven years in a row and Law360 selected the Antitrust Practice Group as a Competition Law Practice Group of the Year in 2013 and 2014.

Mr. Pierson has served as lead or co-lead counsel in many antitrust cases on behalf of the victims of corporations engaged in price-fixing, market monopolization and other unlawful conduct. Prior to joining Cohen Milstein in 2009, Mr. Pierson spent more than 20 years primarily representing defendants in a broad range of complex matters. Some of the companies he represented included Microsoft Corp., 3M Corp. and other major corporations, national associations and individuals in class actions and other antitrust litigation. As a result of his experience as a defense lawyer, Mr. Pierson possesses deep insight into defense strategies, understands the dynamics of the other side and is someone who has earned the respect and credibility of opposing counsel.

Mr. Pierson is a hands-on litigator who has litigated and tried antitrust lawsuits and other complex civil cases in many jurisdictions, helping to win settlements and judgments cumulatively totaling more than $1.5 billion in the past several years. Currently, he is lead or co-lead counsel in many antitrust cases at the firm. Some of his current cases include:

- Domestic Drywall Litigation: Cohen Milstein is co-lead counsel in an antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices. Mr. Pierson is running the case for Cohen Milstein and in 2015 took the lead for the direct purchaser plaintiffs in arguing against the defendants' summary judgment motions (which were denied by the Court for four of the five

defendants). Settlements for $45 million were also reached with two other defendants. The case is ongoing.

- Ductile Iron Pipe Fittings Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs in a price-fixing case against the three largest manufacturers of ductile iron pipe fittings—McWane Inc., Sigma Corporation and Star Pipe Products—and a monopolization case against McWane for excluding significant competition in the domestic ductile iron pipe fittings market. Settlements of $9 million have been reached with two of the defendants, Sigma and Star. Currently, Mr. Pierson is directing the team of attorneys that is now taking and completing fact depositions. The litigation is ongoing.
- Cast Iron Soil Pipe & Fittings Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs against the two largest soil pipe and fittings manufacturers in the country (McWane Inc. and Charlotte Pipe & Foundry) and the trade association they control (Cast Iron Soil Pipe Institute) in a lawsuit alleging that the defendants engaged in a nationwide price-fixing conspiracy and other anticompetitive actions. Mr. Pierson is directing the litigation team, which is currently concluding fact discovery. The litigation is ongoing.

Mr. Pierson's successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants—Bayer, BASF, Huntsman and Lyondell—settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, in which Mr. Pierson was one of the trial lawyers for the class, the jury returned a $400 million verdict for the plaintiffs, which is trebled under federal antitrust law to more than $1 billion, the largest verdict in the country in 2013, as reported by the National Law Journal. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment, and the case against Dow Chemical was settled for $835 while the matter was pending before the United States Supreme Court (resulting in a total recovery of $974.5 million in the case).
- Community Health Care System Litigation: Cohen Milstein is co-counsel representing an emergency room doctor and nurse in a whistleblower lawsuit alleging Community Health Care System defrauded the federal government in connection with health care bills. Cohen Milstein was co-counsel representing an emergency room doctor and nurse who brought claims against CHC under the False Claims Act. Mr. Pierson led Cohen Milstein's team in the case, which was brought under the False Claims Act. The case was resolved for $94 million.
- Electronic Books Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that Apple and five of the leading U.S. publishers conspired to raise the retail prices of e-books. Mr. Pierson led the Cohen Milstein team, which secured class certification, defeated motions to exclude the class expert, and successfully moved for exclusion of most of Apple's expert testimony. The five publishing defendants settled for $166 million and a settlement was reached with Apple shortly before trial for an additional $450 million.
- Guantanamo Litigation: Mr. Pierson represented Alla Ali Bin Ali Ahmed, a young man who had been arrested with many others while residing in a house in Pakistan and was then incarcerated in Guantanamo without a judicial hearing for more than seven years. After filing a habeas corpus petition, Mr. Pierson represented Mr. Ahmed at a multi-day evidentiary hearing before a United States District Court judge. At the conclusion of the hearing, the District Court ruled that the evidentiary record did not support Mr. Ahmed's detention and ordered that he be released from Guantanamo and

returned to his home country.

Mr. Pierson was named one of the 500 leading lawyers in the United States in 2013 and 2014 by LawDragon 500 and was one of six lawyers selected by Law360 in 2014 as an MVP in the field of competition law. A champion for civil rights, he is a member of the Board of Trustees for the Lawyers' Committee for Civil Rights Under the Law, a national organization, and a Member of the ACLU of Maryland's Committee on Litigation and Legal Priorities.Mr. Pierson attended Macalester College, earning a B.A., magna cum laude, in Economics and Political Science, and graduated from the University of Michigan Law School, magna cum laude, where he was a Note Editor of the Michigan Law Review and a member of the Order of the Coif. Following law school, he served as a Law Clerk for the Honorable Harry T. Edwards, United States Court of Appeals for the District of Columbia Circuit, from 1983-1984 and as a law clerk for the Honorable Chief Judge John Feikens, United States District Court for the Eastern District of Michigan, from 1984-1985.

J. Douglas Richards

J. Douglas Richards is a Partner in the Antitrust practice group, having joined the firm in 2009. Mr. Richards has had a long, extensive and eclectic career, litigating on behalf of defendants for 16 years, serving as a government regulator at the Commodity Futures Trading Commission ("CFTC") and representing plaintiffs for the past 16 years. As a result, he brings a global understanding of antitrust litigation.

Mr. Richards' extensive experience litigating both Commodity Exchange Act and Sherman Act claims and his expertise in the antitrust class action field is widely recognized. He was named one of twenty-two antitrust "Litigation Stars" nationally, as one of the world's leading competition lawyers by *The International Who's Who of Competition Lawyers and Economists* (2014), and has received the highest available peer ranking for many years from *Martindale-Hubbell*. Mr. Richards has been appointed co-lead counsel in numerous large antitrust class actions in the Southern District of New York (SDNY) and nationally. Mr. Richards has argued dozens of appeals, among them a number of antitrust matters that have helped shape the landscape of antitrust law, including *Bell Atlantic v. Twombly*, 550 U.S. 544 (2007) before both the Second Circuit and the United States Supreme Court, and Second Circuit cases like *In re Tamoxifen Citrate Antitrust Litig.*, 429 F.3d 370 (2d Cir. 2005), cert. denied, 127 S.Ct. 3001 (2007), and *Kruman v. Christie's Int'l PLC*, 284 F.3d 384 (2d Cir. 2002).

Mr. Richards possesses extensive experience in the Commodity Exchange Act field, having served as Deputy General Counsel of the Commodity Futures Trading Commission ("CFTC") from 1997 to 2000. During that time, Mr. Richards assumed responsibility for all litigation by and against the CFTC (including personally arguing numerous appeals on behalf of the CFTC), and for two of those years simultaneously managed the CFTC's adjudicatory functions. In 1999, the Commission awarded Mr. Richards a Special Service Award for performing those two roles at the same time and successfully eliminating a long-standing backlog of Commission adjudicatory matters.

Mr. Richards is a leading lawyer nationwide in pharmaceutical antitrust litigation, a specialization that requires a deep understanding of the drug industry, patent law, FDA regulation and trade regulation. Starting in 2000 with the *Cipro* litigation, Mr. Richards was co-lead counsel on several antitrust lawsuits challenging the pharmaceutical industry's practice known as pay-for-delay, or reverse payments. Many of those cases hit a roadblock in the courts, when the courts adopted a scope of patent rule. Following the Supreme Court's decision in *Actavis* in 2012, the Supreme Court overruled the legal standards that had been adopted in the

lower courts of appeals and opened the door for further litigation. In the wake of *Actavis*, Mr. Richards leads a team of litigators that have filed new pay-for-delay reverse payments cases.

Mr. Richards graduated with honors from the University of Chicago, majoring in Economics, and earned his J.D. from Harvard Law School. Prior to joining Cohen Milstein, Mr. Richards served as head of the antitrust class action group at two major plaintiffs firms and, before that and his government service at the CFTC, Mr. Richards served as a litigation partner in a boutique law firm. He is a noted speaker at professional conferences, discussing the trends in commodities and pharmaceuticals antitrust law. He has written extensively about antitrust laws, including chapters for books edited by the American Antitrust Institute covering issues of class action practice, law reviews, and other scholarly publications.

Karen L. Handorf

Karen L. Handorf is a Partner at Cohen Milstein, and chair of the Firm's Employee Benefits (ERISA) Practice Group. She joined the Firm in 2007, following a distinguished career in government service, litigating ERISA cases in federal appellate and district courts. In her role as head of the Employee Benefits Practice, Ms. Handorf represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases in the district courts and on appeal.

Ms. Handorf is involved in litigation and appeals involving a broad range of employee benefits issues including church plans. In Kaplan v. St. Peter's Healthcare System, she represents a class of 2,800 participants in an alleged church plan, a case in which the Court of Appeals upheld the rights of St. Peter's pension fund participants to a fully funded pension plan. In addition, she currently leads a team of litigators in a series of church plan lawsuits alleging that health care systems wrongfully claim their benefit plans are exempt from ERISA's protection. Ms. Handorf is overseeing and developing these cases.

Prior to joining Cohen Milstein, Ms. Handorf was an attorney for the U.S. Department of Labor (DOL), where she litigated ERISA cases in federal appellate and district courts for 25 years. While at the DOL, she played a major role in formulating the Government's position on ERISA issues expressed in amicus briefs filed by the Solicitor General in the United States Supreme Court.

She began her ERISA career as a trial attorney in the Plan Benefits Security Division (PBSD), where she litigated actions brought by the Secretary of Labor for violations of the fiduciary standards of ERISA and handled appellate matters. In 1989, she was appointed Counsel for Decentralized and Special Litigation responsible for supervising the DOL's ERISA appellate litigation, district court litigation brought by regional offices of the Solicitor of Labor and administrative litigation involving the civil penalty provisions of ERISA. At the DOL, Ms. Handorf established and supervised PBSD's amicus brief writing program, which addressed a wide range of novel and difficult ERISA issues in both state and federal court. In 2001, she was appointed Deputy Associate Solicitor of PBSD. As the Deputy Associate Solicitor, she was responsible for overseeing litigation brought by the Secretary of Labor and legal advice provided to the Employee Benefit Security Administration, which administers Title I of ERISA. In 2005, she returned to her position as supervisor of the ERISA appellate and amicus brief writing program, serving as Counsel for Appellate and Special Litigation.

Currently, Ms. Handorf is litigating a series of church plan cases, including:

- Saint Peter's Healthcare System Church Plan Litigation: Cohen Milstein is co-lead counsel in Kaplan v. St. Peter's Healthcare System alleging that the defendants wrongfully claim their pension plan is

exempt from ERISA protection. Ms. Handorf argued the case before the U.S. Court of Appeals for the Third Circuit, which unanimously ruled that St, Peter's pension plan does not qualify as a "church plan." The Third Circuit further noted that as of 2012, religiously affiliated hospitals accounted for seven of the nation's 10 largest nonprofit healthcare systems and that to construe the church plan exemption to apply to such hospitals would defeat the purpose of ERISA. The ruling is likely to set the tone for other church plan litigation.

Her past successes include:

- Goodyear Litigation: Ms. Handorf represented a class of 30,000 Goodyear union retirees in Redington v. Goodyear (N.D. Ohio), in which Cohen Milstein obtained approval of a class action settlement between the retirees, Goodyear and the United Steel Workers, resulting in the establishment of a $1 billion trust through which retiree health care benefits will be provided in the future.

Ms. Handorf is a recipient of the Department of Labor Distinguished Career Service Award, and received Exceptional Achievement Awards for her work on ERISA 401(k) plan remedies, the amicus brief in the Enron litigation, retiree health care, the amicus program in general, the appellate brief in the Department's Tower litigation, termination annuities litigation and multiple employer welfare arrangement (MEWAs) litigation.

Ms. Handorf has been recognized for her expertise by her colleagues in the ERISA bar, who named her a Fellow of the American College of Employee Benefits Counsel. She is a frequent speaker on ERISA issues for the ABA, various bar associations and private seminars, and serves as plaintiffs' co-chair of preemption subcommittee of the Employee Benefits Committee of the ABA's Labor Section. In 2016, she was named to the *Best Lawyers in America*.

Ms. Handorf attended the University of Wisconsin-River Falls, where she received a B.S. in Speech and History, and earned her law degree from the University of Wisconsin Law School.

Martha Geer

Judge Martha Geer is a Partner at Cohen Milstein and will be head of the firm's new Raleigh, North Carolina office. She joined the firm in May 2016 after a distinguished career on the North Carolina Court of Appeals. Judge Geer's background – almost two decades as a respected litigator and appellate advocate handling complex civil litigation followed by more than 13 years as a rarely-reversed appellate judge – is a composite of experience few attorneys have. Her combined litigation and judicial experience gives her a unique perspective and insight that will benefit her clients at the trial level and on appeal. In returning to private practice, Judge Geer will practice across all of the firm's areas of expertise, working at both the trial and the appellate levels.

Judge Geer was first elected to the North Carolina Court of Appeals in 2002, receiving more than a million votes statewide. In 2010, because of her reputation as a fair and impartial judge, she garnered bipartisan support that resulted in her winning re-election by a 20-point margin. During her tenure on the Court, Judge Geer has heard more than 3,800 appeals, authored more than 1,350 opinions, and had her opinions reversed less than 2% of the time. As one of the most experienced Court of Appeals judges, Judge Geer has been responsible for hearing and deciding appeals on a wide variety of issues involving almost every area of law. She also served on the Court's Executive Committee, which works with the Chief Judge in administration of

the Court. During her service on the Court, she was named Outstanding Appellate Judge by the North Carolina Advocates for Justice.

Judge Geer's time on the bench has enhanced her ability to understand what judges – trial and appellate – need and want to know in order for clients to prevail at both the trial and appellate levels. Because of the similarity of intermediate appellate courts across jurisdictions, her experience and knowledge gained in North Carolina is valuable in litigation and appeals pending in all jurisdictions including the federal courts, making her a unique resource for clients. In addition, Judge Geer's reputation as an intelligent, practical, fair, and unbiased judge increases her credibility when arguing before other judges whether at the trial level or on appeal.

Illustrating the diversity of practice areas involved in her opinions, in *Boyd v. Robeson County*, Judge Geer wrote an opinion holding in a case of first impression for North Carolina that the office of a county sheriff is a "person" that may be sued under 42 U.S.C. § 1983, allowing an inmate to sue for violation of her Eighth Amendment rights when a jail failed to provide medical treatment after her appendix burst. In another opinion authored by Judge Geer, *Diggs v. Novant Health Inc.*, the Court held, again in a case of first impression, that a hospital could be liable under an apparent agency theory for the negligence of independent contractor anesthesiologists. In *Mason v. Dwinnell*, Judge Geer's opinion held that a trial court had authority, under the federal constitution, to award custody of a child, including visitation, to a same-sex domestic partner who was not a legal parent of the child. Judge Geer's opinion in *Blinson v. State* upheld the constitutionality, under the federal and state constitutions, of economic tax incentives granted to corporations in order to bring jobs to the State.

Prior to going on the bench, Judge Geer was a partner with two leading North Carolina plaintiffs' firms and was one of the founders of the second firm. She was a highly respected trial and appellate litigator known for obtaining cutting-edge and precedent-setting victories in a diverse set of practice areas, including among others, securities litigation, labor and employment law, ERISA, antitrust and trade regulation, commercial litigation, consumer protection, and constitutional and civil rights litigation (including suits against the State, sheriffs, counties, and municipalities). She was selected for inclusion in *Best Lawyers in America*, and recognized by the journal *Business North Carolina* as one of North Carolina's "Legal Elite" – a list of the top 200 lawyers in the State.

Judge Geer began her legal career with Paul Weiss Rifkind Wharton & Garrison where she was taught that a bright, hardworking lawyer, willing to learn, can handle any type of litigation – a philosophy that led to her eclectic practice upon leaving Paul Weiss. While at Paul Weiss, she had the privilege of working with nationally-respected litigators, including legal icons such as Arthur Liman, on high profile cases including the litigation arising out of the attempt to corner the silver market in 1979-1980. She also gained experience defending shareholder derivative and corporate takeover litigation. Judge Geer did substantial pro bono work, including being part of a team that obtained a stay of execution on behalf of a mentally retarded man on death row who was subsequently shown to be innocent by DNA testing, once such testing finally became available. That work led to her being one of the recipients of the 2004 Dybwad Humanitarian Award, the highest honor of the American Association on Intellectual and Developmental Disabilities.

As both a judge and a lawyer, Judge Geer has worked to improve the quality of legal representation through service on the Appellate Specialization Committee of the North Carolina State Bar, the Appellate Rules Committee of the North Carolina Bar Association, the Board of Governors of the North Carolina Advocates for

Justice, and various committees of the American Bar Association and other bar association groups. She is also a highly sought after teacher of continuing education programs for both other judges and lawyers.

Judge Geer received her B.A. *summa cum laude* from Bryn Mawr College and her J.D. with high honors from the University of North Carolina School of Law where she was a Morehead Fellow and served as Managing Editor of the *North Carolina Law Review*.

Geoffrey Graber

Geoffrey Graber is a Partner at Cohen Milstein and a member of the Consumer Protection practice group. In this role, Mr. Graber specializes in complex litigation aimed at protecting consumers deceived and harmed by consumer service providers such as banks, insurance and health care companies. In addition, he is a member of the Commercial Contingency practice and also represents whistleblowers under the False Claims Act.

Currently, Mr. Graber is litigating the high-profile lawsuit arising out of the massive data breach at Anthem Inc. that compromised the personal identification and health information of more than 80 million customers of the health care company. The lawsuit alleges the company failed to take adequate measures to ensure its data systems were protected, failed to take available steps to prevent and stop the breach from happening, and failed to disclose to its customers the material facts that it did not have adequate computer systems and security practices to safeguard customers' financial accounts and personal data. Mr. Graber is involved in all aspects of the litigation.

Prior to joining the firm in 2015, Mr. Graber served as Deputy Associate Attorney General and Director of the Residential Mortgage-Backed Securities (RMBS) Working Group at the United States Department of Justice (DOJ).

As Director of the RMBS Working Group, Mr. Graber oversaw the DOJ's nationwide investigation into the packaging and sale of mortgage-backed securities leading up to the financial crisis. He supervised and coordinated the efforts of over 100 prosecutors, lawyers, investigators and analysts from the DOJ. Mr. Graber also worked closely with senior officials from the United States Securities & Exchange Commission, the Department of Housing and Urban Development, the Inspector General's Office for the Federal Finance Agency and the offices of more than 10 state attorneys general.

The investigations overseen by Mr. Graber ultimately recovered more than $36 billion. These recoveries include the record-breaking $16.65 billion settlement reached in August 2014 with Bank of America – the largest settlement with a single entity in U.S. history – as well as settlements with Citigroup ($7 billion) and JP Morgan ($13 billion).

Earlier in his tenure at the DOJ, Mr. Graber served as Counsel in the Civil Division, where he proposed and then led the three-year investigation of Standard & Poor's and its ratings of structured finance products from 2004 to 2007. As the lead lawyer overseeing the investigation, he supervised a team of over 50 prosecutors, DOJ lawyers, investigators and analysts. The investigation, which made groundbreaking use of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), resulted in the largest enforcement action filed by the United States concerning the financial crisis (United States v. Standard & Poor's).

Before joining the Department of Justice, Mr. Graber was an associate at a top-tier defense firm, where he defended Fortune 500 companies and their officers and directors in securities and derivative suits, consumer class actions and government investigations. Mr. Graber also devoted substantial time to pro bono representation of indigent individuals and families in civil rights actions against local law enforcement.

In 2014, Mr. Graber received the Attorney General's Distinguished Service Award for his work relating to the $13 billion settlement with JP Morgan – including, at the time, the largest FIRREA penalty recovered by the Department of Justice. In October 2015, he again received the Attorney General's Distinguished Service Award for his work on the successful investigation of and litigation against S&P.

Mr. Graber received his undergraduate degree in Philosophy from Vassar College, and earned his law degree from the University of Southern California Law School, where he served as the Managing Articles Editor on Southern California Law Review.

Leslie M. Kroeger

Leslie M. Kroeger is a Partner at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practice groups. Ms. Kroeger joined Cohen Milstein in January 2014 and is based in the firm's Florida office. She specializes in complex, high-profile product liability, wrongful death, and managed care abuse litigation.

Ms. Kroeger is a highly accomplished civil trial attorney who began her legal career in the courtroom as an Assistant Public Defender and later became an Assistant State Attorney in Miami-Dade County, Florida. She then moved into private practice where she continues to handle a variety of complex civil litigation matters both in the state of Florida and nationwide.

Currently, Ms. Kroeger is litigating the following notable matters:

- HCA: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that two Florida women and others like them were billed inflated and exorbitant fees for emergency radiology services covered in part by their Florida Personal Injury Protection (PIP) insurance. Ms. Kroeger is involved in all aspect of the litigation charging HCA hospitals with gouging patients with PIP coverage. The case is ongoing.
- United States of America, et al. v. AIDS Healthcare Foundation, Inc.: Cohen Milstein represents three former managers of the AHF in a Federal and Florida State Whistleblower Act claims against the nation's largest provider of HIV/AIDS medical care for illegal patient referral kickbacks. Ms. Kroeger has been involved in all aspects of the litigation. The case is ongoing.

Ms. Kroeger has successfully litigated the following lawsuits:

- *Mincey v. Takata*: Cohen Milstein was lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic in 2014 when the driver's side airbag in her Honda Civic deployed too aggressively during a collision due to a product defect. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia casued by the problematic airbag. The suit charged that Takata, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by the firm showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016

- *Quinlan v. Toyota Motor Corporation*: Cohen Milstein was lead counsel in a product liability case filed against Toyota Motor, alleging that manufacturing defects in the defendant's car caused the car being driven by the plaintiff Quinlan to suddenly accelerate and go out of control, resulting in catastrophic injuries that left him a quadriplegic. The defendant entered into a settlement, which is confidential. Ms. Kroeger was engaged in all aspects of the litigation.
- *Love v. Walmart*: Ms. Kroeger represented individual female Walmart employees in a lawsuit alleging that the company discriminated against them on the basis of their sex. The defendant reached a confidential settlement with the plaintiffs.
- Caterpillar Antitrust Litigation: Cohen Milstein was co-lead counsel in a nationwide product liability class action lawsuit alleging Caterpillar sold diesel engines with defective exhaust emissions system that resulted in power losses and shutdowns. Ms. Kroeger was involved all aspects of the litigation.

Ms. Kroeger has achieved an AV rating from Martindale-Hubbell, and has been recognized by Best Lawyers in the field of Product Liability Litigation – Plaintiffs. She was recently named to Law360's Product Liability Editorial Advisory Board. She speaks frequently on strategies and tactics for addressing the standards for expert witness testimony in light of the Supreme Court's Daubert ruling.

Ms. Kroeger currently serves as the Secretary on the Executive Committee of the Florida Justice Association and is past Chair of the Women's Caucus. She serves on the Florida Bar Professional Ethics Committee. She is Past President of the Martin County Chapter of the Florida Association for Women Lawyers and is on the Board of Directors of Guardians for New Futures; as well as serving as an active member of The Florida Bar, the American Association for Justice, the Palm Beach County Bar Association, the Martin County Bar Association, the Palm Beach County Justice Association, and the Florida Association for Women Lawyers, Martin County Chapter.

Ms. Kroeger graduated with high honors from the University of Tennessee at Knoxville, and obtained her law degree from the Cumberland School of Law, Samford University. Following law school, she served in a trial clerkship in Miami.

Victoria S. Nugent

Victoria S. Nugent is a Partner at Cohen Milstein and Co-Chair of the Public Client practice group. She has been with the Firm since 2000 and her work has focused on consumer protection and public health and safety.

Ms. Nugent began at Cohen Milstein in the Firm's Consumer Protection & Unsafe Products Practice, where she focused on consumer protection and public health litigation. Past cases include In re StarLink Product Liability Litigation, in which she represented farmers suing Aventis CropScience after an unapproved variety of genetically modified corn was detected in the U.S. corn supply and drove down prices for all U.S. corn exports. More than $100 million was recovered for the class in a landmark settlement. In 2009 and 2010, Ms. Nugent filed suit on behalf of consumers challenging the post-transaction marketing practices (also sometimes called "negative option marketing") and in two significant rulings persuaded federal courts in California and Washington that these practices run afoul of state consumer protection laws. Ms. Nugent has argued cases before the high courts of Georgia, Nebraska and the District of Columbia, as well as the federal D.C. Circuit Court of Appeals.

Ms. Nugent joined the Firm's Public Client Practice Group in 2011, where she is currently, representing several states in investigations into Medicaid and consumer fraud by numerous for-profit nursing home chains that

promised, but failed to provide, basic care to their elderly residents. Ms. Nugent has been overseeing all aspects of these investigations.

Ms. Nugent has represented public clients on other matters involving consumer and financial fraud. Some of her successes include:

- Represented the states of Arizona and Nevada in litigation against Bank of America for deceptive conduct in connection with servicing approximately 500,000 mortgages; resulting in financial payments to consumers and the states, commitments to mortgage modifications and other equitable relief valued at nearly $1 billion.
- Represented the state of Nevada in investigations into the conduct of Deutsche Bank and the Royal Bank of Scotland, two of the investment banks that encouraged and enabled the predatory lending practices of retail lenders. Ms. Nugent helped develop the State's legal theories and claims and handled numerous aspects of these investigations.

Prior to joining the Firm, Ms. Nugent worked for seven years at Public Citizen, a national consumer advocacy organization. There, she worked on many legislative and regulatory campaigns addressing issues that ranged from automobile safety to international trade policy. After graduating from law school in 1998, Ms. Nugent received a two-year fellowship sponsored by the National Association for Public Interest Law (NAPIL). As a NAPIL Fellow, she worked at Trial Lawyers for Public Justice, where she helped develop and prosecute impact litigation in the areas of arbitration, banking, credit and insurance.

Ms. Nugent has served on the D.C. Bar Committee on the Rules of Professional Conduct since 2012.

Benjamin D. Brown

Benjamin D. Brown is a Partner at Cohen Milstein, and a member of the Antitrust Practice Group, having joined the firm in 2005. Mr. Brown, who previously served in the Antitrust Division of the United States Department of Justice, brings to his role extensive experience leading complex litigation, particularly antitrust class actions.

Mr. Brown has been appointed by federal courts to serve as co-lead counsel or on steering committees for plaintiffs in numerous important matters, such as In re Plasma-Derivative Protein Therapies Antitrust Litigation (N.D. Ill.); Allen, et al. v. Dairy Farmers of America, Inc. (D. Vt.); and In re Puerto Rican Cabotage Antitrust Litig. (E.D. Ca.). He has led cases through trial and argued appeals and stands ready to take cases through to the finish line.

Mr. Brown is also a leader in the area of takings cases, claims that are brought under the Fifth Amendment of the U.S. Constitution for the unconstitutional taking of property without compensation. He also represents individuals or groups in litigations and confidential arbitrations involving complex commercial disputes, particularly those involving regulated markets.

Currently, Mr. Brown is litigating a number of large, complex antitrust lawsuits, where he plays a prominent role and leads all aspects of the litigation, from deciding on the claims to be brought, the strategy to be pursued and charting the course of the case. Notable matters include:

- Mixed Martial Arts (MMA) Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action on behalf of elite MMA fighters alleging that Zuffa LLC – commonly known as the Ultimate Fighting

Championship or "UFC" – has unlawfully monopolized the markets for promoting live professional MMA bouts and for purchasing the services of elite professional MMA fighters. The district court denied the defendant's motion to dismiss the case in September 2015 and discovery is ongoing. Mr. Brown is co-lead in the class action lawsuit.

- Northeastern Dairy Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit on behalf of Northeast dairy farmers against Dairy Farmers of America (DFA) and Dean Foods Company charging a conspiracy to reduce competition for raw milk and that DFA monopolized the milk market in the Northeast, forcing dairy farmers to market their milk through DFA or its affiliate Dairy Marketing Services (DMS). Dean has settled its liability and the case against DFA is ongoing.
- People of the State of California v. American Express Unfair Competition Litigation: Cohen Milstein is counsel for the City of San Francisco in litigation alleging that American Express, by prohibiting merchants from steering consumers to less costly payment methods (including debit cards and cash), is responsible for unlawful overcharges borne by retailers and, indirectly, all California consumers. Mr. Brown is lead outside counsel to the city in the ongoing litigation.

Mr. Brown is also currently litigating a number of takings lawsuits, including the following notable matters:

- Ideker Farms, et al. v. the United States of America: Cohen Milstein represents Ideker Farms and more than 400 other plaintiffs located in six states along the Missouri River in a mass action lawsuit in the U.S. Court of Federal Claims alleging that the federal government took land and flooding easements over lands owned by farmers without any compensation in violation of the takings clause of the Fifth Amendment. Mr. Brown has been directing and leading all aspects of the litigation for the Cohen Milstein team. The case is set to go to trial in 2017.
- Big Oak Farms, Inc., et al. v. the United States of America: Cohen Milstein represents a group of farmers along the Mississippi River in a Fifth Amendment takings case alleging that the U.S. Army Corps of Engineers intentionally flooded plaintiffs' land without providing just compensation. Mr. Brown has been directing and leading all aspects of the litigation.

Mr. Brown also represents classes or individual corporations in the following commercial disputes:

- DairyAmerica Antitrust Litigation: Cohen Milstein is sole lead counsel of a putative class of dairy farmers who allege that defendants fraudulently misreported nonfat dry milk prices to the National Agricultural Statistics service, resulting in artificially depressed raw milk prices and unfairly depriving American dairy farmers of tens or hundreds of millions of dollars. Mr. Brown directs and leads all aspects of the litigation.
- Inmate Calling Services Provider Litigation: Cohen Milstein is on the executive committee in several nationwide class action lawsuits alleging that the providers of inmate calling services have charged inmates and their families unjust and unreasonable rates in violation of the Federal Communications Act and various state laws. Mr. Brown leads the Cohen Milstein team on these class action lawsuits. The litigation is ongoing.
- College Media Commercial Litigation: Cohen Milstein represents an e-commerce business in a breach of contract action against a former partner business. Mr. Brown leads that litigation, which is now pending in federal bankruptcy court.

The Legal 500 has recognized Mr. Brown as one of the nation's leading class action antitrust attorneys and he has been listed as one of Washington D.C.'s "Leading Star" Plaintiffs' Litigators by Benchmark Litigation,

recognizing his writing, his depositions and his arguments in court. He is a frequent panelist at legal industry gatherings and is a recognized expert on antitrust litigation whose opinions on the newest developments and trends in antitrust litigation are often quoted in the media. Mr. Brown is a contributing author of the ABA's Antitrust Class Actions Handbook, and has served as a state editor for the ABA's Survey of State Class Action Law. He authored several chapters on private antitrust recovery actions for the Global Competition Review's Antitrust Review of the Americas, and co-authored with fellow partner Douglas Richards, "Predominance of Common Questions – Common Mistakes in Applying the Class Action Standard," Rutgers Law Journal (Vol. 41).

Mr. Brown joined Cohen Milstein's Antitrust Practice following four years as a trial attorney with the Antitrust Division of the United States Department of Justice. At the Department of Justice, Mr. Brown led and assisted in numerous investigations, litigations and trials involving antitrust activity and mergers. Mr. Brown also served as a Special Assistant United States Attorney in the Eastern District of Virginia, where he prosecuted criminal cases. Prior to serving in the U.S. Department of Justice, Mr. Brown was in private practice, where he counseled defendants in antitrust litigation matters. This experience has provided him with insights into defense strategies and has earned him the respect of defendants' counsel.

Mr. Brown attended the University of Wisconsin – Madison, where he graduated Phi Beta Kappa, majoring in Philosophy, and earned his J.D, from Harvard Law School, graduating cum laude. He served as Law Clerk to the Hon. Chief Judge Juan R. Torruella, U.S. Court of Appeals for the First Circuit. The United States District Court for the District of Columbia has honored Mr. Brown for his outstanding commitment to pro bono litigation.

Joshua S. Devore

Joshua Devore is a Partner at Cohen Milstein and a member of the Securities Litigation & Investor Protection Practice Group. In this role, Mr. Devore has distinguished himself in representing investors in complex high-profile securities fraud class actions and in guiding a broad range of class action lawsuits, from the massive BP Deepwater Horizon oil spill to the Parmalat securities litigation. His practice has led him to discovery efforts around the world, having taken depositions on four continents.
Mr. Devore's current cases include the following notable matters:

- BP Securities Litigation: Cohen Milstein is co-lead counsel in the long-running, procedurally complex case arising from the devastating Deepwater Horizon oil spill in the Gulf of Mexico. The U.S. Court of Appeals for the Fifth Circuit affirmed the class certification ruling of investors who purchased BP's American Depositary Shares on April 26, 2010, through and including May 28, 2010, and who were injured by BP's low-balling the severity of the oil spill in the aftermath of the Deepwater Horizon explosion. Mr. Devore is involved in all aspects of the litigation.

- Kingate Global and Kingate Euro Funds Litigation: Cohen Milstein is co-lead counsel in a lawsuit that alleges Kingate Global and Kingate Euro, feeder funds in the Bernard Madoff Ponzi scheme, and several related entities failed in their obligations to protect investors in the funds. The lawsuit was initially dismissed on the basis of Securities Litigation Uniform Standards Act of 1998 (SLUSA), but that decision was reversed on appeal by the Second Circuit in an opinion that has set a new standard on which claims are precluded by SLUSA and which are not. Mr. Devore is involved in all aspects of the litigation.

- State of Mississippi v. Moody's Corp. Litigation: Cohen Milstein is representing the Attorney General of the State of Mississippi in a consumer protection action addressing Moody's misrepresentation of its

independence and objectivity in its analysis of structured finance securities in the years leading up to the financial crisis. Mr. Devore is involved in all aspects of the litigation.

- Broadcom Merger Litigation: Cohen Milstein is lead counsel representing institutional investors in a litigation challenging the $37 billion Broadcom-Avago merger. The lawsuit alleges the transaction was structured to benefit management and insiders with a controlling share of Broadcom, at the expense of the common shareholders. Mr. Devore is involved in all aspects of the litigation.

Some of Mr. Devore's successes include:

- In re Lucent Technologies Securities Litigation: $575 million settlement. Cohen Milstein co-lead counsel, representing plaintiffs in a massive securities fraud class action in cash, stocks and warrants. The settlement ranks as one of the largest securities class actions in history. Mr. Devore was involved in all aspects of the litigation.

- In re Merrill Lynch Research Reports Securities Litigation: $125 million settlement. Cohen Milstein represented plaintiffs in a class action lawsuit alleging that Merrill Lynch's Internet analysts dishonestly recommended stocks whose prospects they viewed as dim. The complex case took more than six years to litigate. Mr. Devore was involved in all aspects of the litigation.

- In re Parmalat Securities Litigation: $90 million settlement. Cohen Milstein was co-lead counsel in a class action lawsuit involving Parmalat, a company often referred to as "Europe's Enron." The litigation involved the biggest fraud in European history, in which revenues were manufactured out of thin air and numerous Parmalat executives were indicted and went to prison. The litigation involved depositions around the world, and resulted in settlements with the company's two outside auditors and investment banks, as well as the "new" Parmalat that emerged following the scandal. Mr. Devore was involved in all aspects of the litigation.

- IntraLinks Litigation: $14 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that the company concealed the impending loss of its biggest client, the Federal Deposit Insurance Corporation, during the class period, which included a secondary stock offering. The lawsuit involved an intensive discovery period during which more than 1.9 million pages were produced and 23 depositions were taken. Mr. Devore was involved in all aspects of the litigation.

- LDK Solar Litigation: $16 million settlement. Cohen Milstein represented investors in a case involving a Chinese solar panel producer. The litigation entailed traveling to Hong Kong, setting up temporary offices, taking 14 depositions in a period of 15 days and reviewing thousands of documents, many of which were in Chinese. Mr. Devore was involved in all aspects of the litigation.

In addition, Mr. Devore has done the following pro bono work:

- U.S. Navy Humanist Chaplain Litigation: Mr. Devore, along with other Cohen Milstein attorneys, represented Jason Heap, who sued the U.S. Navy for rejecting his application to become a chaplain on the basis of his humanist religious beliefs, in violation of the Constitution. After hard-fought discovery, the case settled.

Mr. Devore has authored numerous briefs addressing complex and novel issues of federal securities laws, leading to notable reported decisions such as Lentell v. Merrill Lynch & Co., 396 F.3d 161 (2d Cir. 2005), that reversed a dismissal on statute of limitations grounds and reset the standards for pleading loss causation.

Mr. Devore attended Rice University, where he earned his B.A. in Chemistry, and graduated from Georgetown University Law Center, where he served as Executive Editor of the Georgetown International Environmental Law Review. He is co-author of State Court Class Actions: Trends and Issues, in the National Institute on Class Actions.

Manuel J. Dominguez

Manuel J. ("John") Dominguez is a Partner at Cohen Milstein, and a member of the Antitrust practice group. Mr. Dominguez specializes in complex, multi-district antitrust litigation, representing individuals and businesses that have been harmed by anticompetitive business practices. Mr. Dominguez, in addition, plays a significant role in the practice group identifying and investigating potential antitrust violations.

Mr. Dominguez has been litigating complex antitrust and consumer cases for more than 20 years, and has served as lead counsel and handled numerous high-profile, high-stakes cases during that time. His efforts have enabled aggrieved businesses and consumers to recover hundreds of millions of dollars. He litigated and resolved cutting-edge litigation against AOL for allegedly unlawfully collecting the Internet search data of millions of users and making their private information available for downloading by the general public. Earlier in his career, Mr. Dominguez litigated a highly significant securities matter that settled for hundreds of millions of dollars involving Symbol Technologies Inc., a barcode technology maker that intentionally overstated its revenues through premature revenue recognition, improper consignments arrangements and channel stuffing.

Mr. Dominguez, who joined Cohen Milstein in 2011, has assisted the firm in developing its investigatory and case development groups. He is a hands-on litigator who is currently representing plaintiffs in antitrust litigation involving alleged price-fixing and anticompetitive monopolistic practices in various industries including truck transmissions, medical products, auto industry and finance, among others. Although Mr. Dominguez's practice is focused on antitrust litigation, he continues to be involved in securities and consumer matters.

Mr. Dominguez is currently representing direct purchasers in a series of Auto Parts antitrust class action lawsuits being litigated in the Eastern District of Michigan in Detroit. These cases stem from the largest antitrust investigation in the history of the U.S. Department of Justice, with over $1 billion in fines and multiple criminal indictments. Two of the cases, Wire Harnesses and Bearings, are scheduled to be the first cases to be considered for certification by the court. In these cases, Mr. Dominguez has significant responsibilities, including leading discovery efforts against defendants and assisting experts.

Mr. Dominguez is also co-lead counsel in the Truck Transmissions Antitrust Litigation alleging that Eaton Corp., the largest manufacturer of truck transmissions, and the four major truck manufacturers conspired to create a monopoly for transmissions used in heavy-duty trucks. Mr. Dominguez responsibilities include arguing all the major motions and deposing and defending nearly all the expert depositions in this matter. The case is currently up on appeal in the Third Circuit.

Mr. Dominguez began his career as an Assistant Attorney General serving in the Attorney General of the State of Florida's Department of Economic Crimes. In that role, he represented the state of Florida in prosecuting corporations and business entities for alleged violations of Florida's RICO, antitrust and Unfair and Deceptive Trade Practices Act statutes. Following his service as an Assistant Attorney General, Mr. Dominguez entered private practice, litigating and trying numerous cases involving unfair trade practices and other alleged violations of state and federal consumer protection statutes. In 2000, he joined a premier class action firm focused on antitrust and securities litigation; there, he rose to the head of the firm's antitrust and consumer practice groups. Mr. Dominguez recently won a significant motion to dismiss in a non-class action antitrust action brought on behalf of Doctors and practice groups against a major insurance company and hospital in Florida in Omni Healthcare, Inc. v. Health First, Inc. The issues presented and argued were issues of first impression for the middle district of Florida.

Mr. Dominguez is also nationally recognized for his knowledge of managing the discovery process in today's increasingly technologically complex business environment. He has made presentations on topics such as the impact of the new e-discovery amendments to the Federal Rules of Civil Procedure, and has also participated in The Sedona Conference® Working Group 1, an organization at the vanguard of developing standards for electronic discovery.

Mr. Dominguez formerly served as the Chair for the Antitrust, Franchise & Trade Regulation Committee of the Florida Bar's Business Law Section. Mr. Dominguez previously served as the Vice Chair of this committee and was a member of the Executive Council of Florida Bar's Business Law Section. He is also co-author of an article that appeared in the Florida Bar Journal, "The Plausibility Standard as a Double Edge Sword: The application of Twombly and Iqbal to Affirmative Defenses" (Vol. 84, No. 6).

Mr. Dominguez received a B.A. from Florida International University, and earned his J.D. from the Florida State University Law School, graduating with honors. In law school, he was a member of the Transnational Journal of Law and Policy.

Brent W. Johnson

Brent W. Johnson is a Partner at Cohen Milstein and a member of the Antitrust practice group. Along with Daniel Small, Mr. Johnson leads the group's new case investigations.

Mr. Johnson has considerable expertise in complex antitrust litigation and class actions, representing businesses and individuals as plaintiffs in federal and state civil actions with a focus on multi-district class actions. His class action experience spans multiple industries, such as motion pictures, dairy, building materials, chemicals, automotive parts, processed foods, private equity, adhesives and others. His practice encompasses a broad variety of antitrust claims, including Sherman Act Section 1 restraints of trade and Section 2 monopoly and monopsony claims. He has argued before federal district courts and state trial and appellate courts and brought cases to trial.

Mr. Johnson's recent successes include the following notable antitrust class actions:

- Northeast Dairy: In *Allen vs. Dairy Farmers of America* (D. Vt.), Mr. Johnson serves as lead counsel for one of two certified subclasses of Northeast dairy farmers against Dairy Farmers of America and Dairy Marketing Services who fixed the price of raw milk, allocated markets and agreed not to solicit dairy

farmers to supply raw milk. Defendant Dean Foods Company settled for $30 million, and the Court has preliminarily approved a $50 million settlement with the remaining defendants, DFA and DMS.

- Bulk Bleach: In *Grand Strand v. Oltrin* (D. S.C.) Mr. Johnson was personally appointed co-lead Class Counsel and led the CMST team in representing a class of direct purchasers of bulk bleach, including municipal water authorities and others, against that product's manufacturers who engaged in an illegal market allocation agreement. The Court approved a settlement worth nearly all of the class's single damages and remarked that the case had been "skillfully handled."
- Urethanes (Polyether Polyols): Mr. Johnson serves as co-lead counsel in *In re Urethane Antitrust Litigation* (D. Kan.), on behalf of a certified class of direct purchasers of several types of chemicals who were overcharged as a result of a nationwide price-fixing and market allocation conspiracy. In the litigation, multiple defendants collectively settled for over $130 million, and a jury verdict of $1.1 billion was secured against Dow Chemical, the final defendant, in 2013. Dow ultimately settled for $835 million while the case was on appeal before the Supreme Court, bringing the total recovery to $974 million – nearly 250% of the damages found by the jury.
- Blue Cross Blue Shield of Michigan: Mr. Johnson serves as co-lead counsel in *The Shane Group, Inc. v. Blue Cross Blue Shield of Michigan* (E.D. Mich.), representing a class of purchasers of hospital services against Blue Cross Blue Shield of Michigan for agreeing to MFN provisions in its contracts with hospitals throughout Michigan that required those hospitals to charge other insurers as much or considerably more for services provided to class members. The Court has finally approved a settlement with BCBSM for nearly $30 million.

Currently, Mr. Johnson is litigating the following antitrust class actions:

- VFX/Animation Workers: In *In re Animation Workers Antitrust Litigation* (N.D. Cal.), Mr. Johnson serves as co-lead counsel representing a class of animation and visual effects workers in a lawsuit alleging that the defendants, who include Pixar, Lucasfilm Ltd. and DreamWorks Animation, secretly agreed not to solicit class members and to coordinate on compensation.
- Drywall: Mr. Johnson serves as co-lead counsel in *In re Domestic Drywall Antitrust Litigation* (E.D. Pa.), representing a class of direct purchasers of drywall against drywall manufacturers for price-fixing. The Court has preliminarily approved a settlement of $40 million with a major defendant, and denied summary judgment to four defendants. The case is ongoing.
- Automotive Parts: In *In re Automotive Parts Antitrust Litigation* (E.D. Mich.), Mr. Johnson represents direct purchasers of wire harnesses, bearings and other automotive parts who were overcharged as a result of price-fixing and bid-rigging conspiracies by various sets of defendants throughout the automotive parts industry.

Prior to joining Cohen Milstein in 2009, Mr. Johnson practiced at one of the world's premier full-service global law firms, where he focused on antitrust litigation. Some of Mr. Johnson's matters included:

- *Feesers, Inc. v. Michael Foods, Inc. and Sodexho, Inc.* (M.D. Pa.): Mr. Johnson was a member of the successful trial team that represented Michael Foods, a manufacturer of processed egg products and refrigerated potato products, in a three week trial of a Robinson-Patman Act action brought by a broad-line distributor of food products.
- *Dahl, et al. v. Bain Capital, et al.* (D. Mass.): Mr. Johnson represented The Carlyle Group in a class action where plaintiffs alleged collusion among certain private equity firms and investment banks in specific going-private transactions in violation of Section 1 of the Sherman Act.

- *In re Aftermarket Filters Antitrust Litigation* (N.D. Ill.): Mr. Johnson represented Champion Laboratories, a manufacturer of aftermarket automotive filters, in a class action where plaintiffs alleged a conspiracy among manufacturers to fix prices in violation of Section 1 of the Sherman Act.
- *National Laser Technology, Inc. v. Biolase Technology, Inc.* (S.D. Indiana): Mr. Johnson represented Biolase, the country's largest manufacturer of lasers for dental applications, against Sherman Act claims brought by a competitor aftermarket dental laser support company. The matter resulted in a favorable settlement for the client.

Mr. Johnson also advised clients in the insurance, commodities exchange, chemical and energy industries in obtaining clearance of mergers, acquisitions and joint ventures from the Federal Trade Commission and the Antitrust Division of the Department of Justice in connection with premerger notification proceedings under the Hart-Scott-Rodino Antitrust Improvements Act.

Mr. Johnson has significant experience in other complex civil litigation, including mass torts and government contracts.

Mr. Johnson graduated *magna cum laude* from Duke University, with a B.A. in Political Science and Spanish, and attended Stanford Law School, where he earned his law degree. He is a member of the ABA Section of Antitrust Law. Along with Emmy Levens, he recently published an article on ascertainability in the Spring 2016 issue of the ABA's *Antitrust* magazine. In his pro bono work, he has represented Covenant House Washington, D.C., Habitat for Humanity International Inc. and the Cystic Fibrosis Foundation.

Betsy A. Miller

Betsy A. Miller is a Partner at Cohen Milstein and Co-Chair of the Public Client practice group. Ms. Miller represents state Attorneys General and municipalities in civil law enforcement investigations and enforcement actions involving consumer fraud and false claims. She joined the firm in 2009, helping to launch the Public Client practice and bringing with her a broad legal background that includes government service, private-sector litigation, complex dispute-resolution skills and teaching experience. An accomplished litigator, the *National Law Journal* named Ms. Miller to its prestigious list of Rising Stars in 2009, an honor bestowed on only 40 attorneys under the age of 40 in Washington, D.C.

Prior to joining Cohen Milstein, Ms. Miller served as the Chief of Staff and Senior Counsel to the Attorney General for the District of Columbia. In that capacity, Ms. Miller managed high-profile legal issues and policy initiatives for the Attorney General, serving as the chief liaison to multiple agencies and members of the D.C. Council. Ms. Miller also served as the Mayor's lead labor and employment lawyer during the historic transition of the D.C. Public Schools from an independent agency to one operating under governmental supervision.

Ms. Miller previously served in the federal government as Counsel on the U.S. Senate Committee on the Judiciary, where she worked for Chairman Patrick J. Leahy (D-VT). Ms. Miller was responsible for handling presidential nominations to the federal judiciary, the Department of Justice, the Federal Bureau of Investigation and to U.S. Attorney's Offices.

Ms. Miller also spent eight years as a litigator for two premier defense firms, where she represented some of the nation's largest companies and individuals in matters including First Amendment issues, complex contract disputes, collective bargaining negotiations and arbitration, employment class actions and challenges to

independent contractor classification. Her civil defense experience adds to Ms. Miller's deep and balanced litigation skillset.

Currently, Ms. Miller represents public clients in the following high-profile matters:

- The state of Mississippi's litigation against Moody's for misrepresenting its analytical services related to structured finance securities (such as CDOs, RMBS, and various mortgage-backed securities) as independent and objective. The lawsuit alleges that Moody's deceived the government and citizens of Mississippi because these analytical services were tainted by motives for increased profits and market share at the expense of independence and objectivity.
- A different state in its confidential investigation of a rating agency for misrepresenting its structured finance securities business model as independent and objective.
- The state of Hawaii in its litigation against Living Essentials, Inc., the creator of 5-Hour ENERGY, for misrepresenting the benefits of drinking its so-called "liquid energy shot."

Ms. Miller's investigation and litigation successes include matters in the financial, health care and employment law sectors. Recent examples include:

- Representing the state of Mississippi, a Lead State on the Executive Committee, in the landmark consumer fraud lawsuit against McGraw Hill Financial (a/k/a Standard & Poor's), over the misrepresentation of its structured finance securities business as independent and objective; resulting in a global resolution for 19 states, the District of Columbia and the United States Department of Justice in the amount of $1.375 billion.
- Representing the states of Arizona and Nevada in litigation against Bank of America for deceptive conduct in connection with servicing approximately 500,000 mortgages; resulting in financial payments to consumers and the states, commitments to mortgage modifications and other equitable relief valued at nearly $1 billion.
- Representing the state of Montana in an investigation of a Fortune 100 company regarding alleged misclassification of employees as independent contractors; resulting in a multi-million dollar resolution for the state.
- Representing other state attorneys general and municipalities in numerous confidential investigations and settlements.
-

Earlier in her career, Ms. Miller was a full-time mediator and negotiation consultant. She also was engaged by the Kennedy School of Government to evaluate mediation and arbitration programs across Central America, after which she contributed to a book on the same subject.

Ms. Miller has been a longstanding member of Georgetown University Law Center's adjunct faculty, which she joined in 2001. There, she teaches courses on mediation advocacy and negotiation strategy. She has taught intensive negotiation courses for practitioners attending Harvard Law School's Negotiation Institute (formerly Harvard's Program of Instruction for Lawyers), as well as for a variety of federal and state government agencies, law firms, corporations and non-profit organizations.

Ms. Miller has authored several articles, including her most recent publication, "Untapped Potential: Creating a Systematic Model for Mediation Preparation," which appears as Chapter 13 in the *AAA Handbook on Mediation* – Third Edition (2016).

Ms. Miller received her undergraduate degree in Comparative Literature from Dartmouth College, graduating *magna cum laude* and Phi Beta Kappa, and earned her law degree from Harvard Law School, where she was an editor on the *Harvard Human Rights Journal* and the *Harvard Latino Law Review*. She is the recipient of Harvard Law School's post-graduate Heyman Fellowship for government service and academic excellence and Harvard Law School's Kaufman Fellowship for public service. Following law school, she clerked for the Honorable Thomas Penfield Jackson in the U.S. District Court for the District of Columbia.

Gary L. Azorsky

Gary L. Azorsky is a Partner at Cohen Milstein, and Co-chair of the Firm's Whistleblower/False Claims Act Practice. Mr. Azorsky joined Cohen Milstein in 2012, establishing the practice. In his role, Mr. Azorsky pursues whistleblower cases under the federal and state false claims act statutes in the health care, pharmaceutical, banking and defense contractor industries and other industries that conduct business with the government. Mr. Azorsky specializes in the complex, highly detailed process for filing and pursuing these cases. In his practice, he has helped right wrongs and to recover nearly $2.5 billion in defrauded funds for federal and state governments, including hundreds of millions of dollars for whistleblower clients.

Most recently, Mr. Azorsky served as co-lead counsel in the qui tam action against the pharmaceutical company Wyeth pending in the District of Massachusetts, in which more states joined to intervene along with the government of the United States than had ever before intervened in a qui tam action. (*United States of America et al., ex rel. Lauren Kieff, v. Wyeth*, No.1:03-CV-12366-DPW [D.Mass.].) The $784.6 million settlement was the seventh-largest False Claims Act recovery on record and the second-largest recovery in history involving a single class of drugs. Mr. Azorsky worked alongside Department of Justice attorneys and states Attorneys General throughout the 12-year pendency of the case.

Mr. Azorsky was actively involved in precedent-setting cases, such as the series of Ven-A-Care cases, which were among the first large FCA multi-state cases and laid the groundwork for much of the false claims act litigation that goes on today. He has also represented whistleblowers in False Claims Act cases involving defense contractors, off-label marketing and misbranding by pharmaceutical companies and fraud in connection with the banking industry, for-profit colleges and student loan programs. In addition, Mr. Azorsky represents whistleblowers in tax fraud claims against large and small corporations through the IRS Whistleblower Office, as well as whistleblowers alleging violations of the Foreign Corrupt Practices Act and violations of the federal securities laws filed with the SEC Whistleblower Office.

Mr. Azorsky served as co-counsel for the whistleblower on the following representative matters:

- *United States of America ex rel. Ven-a-Care of the Florida Keys Inc. v. Dey Laboratories, et al.*, Civil Action No. 05-11084 (D. Mass) ($280 Million settlement in December 2010)
- *United States of America ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 07-10248 (D. Mass.) ($280 Million settlement in December, 2010)
- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($6.5 Million settlement with Dey Laboratories, Inc. in March 2010)
- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($9.57 Million settlement with Schering-Plough in December 2009)

- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($8.5 Million settlement with Boehringer Ingelheim in December 2009)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Roxane Laboratories, Inc., Boehringer Ingelheim Pharmaceuticals, Inc., Ben Venue Laboratories, Inc. and Boehringer Ingelheim Corporation*, Civil Action No. GV3-03079 (Travis Cty., Tex.) ($10 Million settlement with Boehringer Ingelheim in November 2005)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Warrick Pharmaceuticals Corporation, Schering Plough Corporation, Schering Corporation*, Civil Action No. GV002327 (Travis Cty., Tex.) ($27 Million settlement with Schering-Plough in May 2004)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Dey, Inc., Dey, L.P.*, Civil Action No. GV002327 (Travis Cty., Tex.) ($18.5 Million settlement with Dey Laboratories, Inc. in June 2003)

Mr. Azorsky is recognized for his expertise. He has served as an expert witness in a legal malpractice case concerning qui tam practice. He has provided expert guidance on the False Claims Act in congressional hearings, as well as before the Vermont Senate Judiciary Committee in support of the passage of a False Claims Act for the state. In addition, he regularly speaks before professional audiences regarding the federal and state False Claims Acts.

Mr. Azorsky is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the Federal False Claims Act and its qui tam provisions. Prior to joining Cohen Milstein, in addition to his Whistleblower/False Claims Act practice, he was actively involved in groundbreaking civil rights, commercial and intellectual property litigation, including Internet and software industry-related litigation.

Mr. Azorsky is a graduate of the University of Pennsylvania, with a B.A. in English, and received his law degree from Cornell University Law School.

Jeanne A. Markey

Jeanne A. Markey, is a Partner at Cohen Milstein and Co-Chair of the firm's Whistleblower/False Claims Act practice group. She has successfully represented whistleblowers in federal and state cases across the country. Ms. Markey has extensive experience in Qui Tam litigation in the health care, defense and education industries, and has represented whistleblower clients in the public housing sector.

Ms. Markey is co-lead counsel in *United States of America et al., ex rel. Lauren Kieff, v. Wyeth*, a high-profile whistleblower case against pharmaceutical giant Wyeth (recently acquired by Pfizer). The lawsuit alleges that Medicaid, the healthcare program for the poor which is jointly funded by the federal and state governments, was defrauded when Wyeth falsely inflated the price of the acid suppression drug Protonix Oral from 2001 through 2006. Thirty-six states and the District of Columbia have joined with the United States to intervene in the Wyeth case – more states than have ever intervened in any other U.S. Qui Tam case.

She also served as the primary attorney representing the putative class in *Benzman v. Whitman*, a class action in Manhattan and Brooklyn against the U.S. Environmental Protection Agency. The claims were based on class members' exposure to contaminants contained in World Trade Center interior dust resulting from the 9/11 attacks.

Ms. Markey is admitted to practice law in the Commonwealth of Pennsylvania, the Eastern District of Pennsylvania and to the First Circuit Court of Appeals, Second Circuit Court of Appeals, and Eleventh Circuit Court of Appeals. She is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the Federal False Claims Act and its Qui Tam provisions, the Association of Qui Tam Attorneys, and frequently speaks about developments in the Qui Tam field. She received her B.A. (*cum laude*) from Colgate University and her J.D. from Cornell University Law School.

Christopher J. Cormier

Christopher J. Cormier is a Partner at Cohen Milstein and a member of the Antitrust practice group. In this role, he has tried cases and obtained settlements and judgments for his clients in excess of $1 billion. He is a member of the Antitrust practice group's New Case Committee as well as a member of the group's Client Committee.

Currently, Mr. Cormier is litigating the following notable matters:

- Anadarko Basin Oil and Gas Lease Antitrust Litigation: Co-lead counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies conspired to rig bids for leases of land held by private landowners in parts of Oklahoma and Kansas. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy. Plaintiffs allege that Defendants illegally conspired to stabilize and depress the price of royalty and bonus payments paid to landowners in the Anadarko Basin oil and gas province — a massive geological formation holding natural gas and oil deposits that includes large parts of Oklahoma and Kansas. Pursuant to this conspiracy, Plaintiffs allege that Defendants communicated about and agreed on prices, allocated particular geographic areas between themselves, and rigged bids for leases of land, lowering acquisition prices across the region and thereby harming the proposed class of landowners.
- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company — the three largest dental supply and dental equipment distributors in the United States — fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays. Mr. Cormier is one of the members of the Cohen Milstein team co-leading this case.
- Ductile Iron Pipe Fittings Antitrust Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs in a price-fixing case against the three largest manufacturers of ductile iron pipe fittings — McWane Inc., Sigma Corporation, and Star Pipe Products — and a monopolization case against McWane for excluding significant competition in the domestic ductile iron pipe fittings market. Settlements of $9 million have been reached with two of the defendants, Sigma and Star. Currently, Mr. Cormier and his team are in the midst of fact discovery and taking depositions of numerous party and non-party witnesses across the country.

- Cast Iron Soil Pipe & Fittings Antitrust Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs against the two largest soil pipe and fittings manufacturers in the country (McWane Inc. and Charlotte Pipe & Foundry) and the trade association they control (Cast Iron Soil Pipe Institute) in a lawsuit alleging that the defendants engaged in a nationwide price-fixing conspiracy. Mr. Cormier and his team are concluding fact discovery, and have taken a significant number of depositions of party and non-party witnesses across the country.

His successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam, a basic component of ubiquitous everyday products such as bed mattresses, car seat cushioning and furniture cushioning. Four defendants — Bayer, BASF, Huntsman, and Lyondell — settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, in which Mr. Cormier was a member of the trial team, the jury returned a $400 million verdict for the plaintiffs, which the district court trebled under federal antitrust law to more than $1 billion. This was the largest verdict in the country in 2013, as reported by the National Law Journal. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment, which is currently on appeal before the United States Supreme Court.
- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein was co-lead counsel for direct purchaser plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin — life-saving therapies derived from blood plasma. Mr. Cormier and his colleagues at Cohen Milstein represented named plaintiff The University of Utah Health Systems as well as the remaining class members in this matter. The defendants were CSL Ltd., CSL Behring, Baxter Healthcare and the Plasma Protein Therapeutics Association (the trade association the manufacturer defendants controlled). Mr. Cormier played an integral role in the investigation and filing of the first complaint in the country in this matter. Following numerous depositions across the globe and the filing of plaintiffs' opening class certification motion and expert report, Mr. Cormier and his team obtained settlements with all defendants totaling $128 million.

Mr. Cormier earned a B.A. at the University of Virginia and attended American University Washington College of Law, graduating *magna cum laude*. He interned with the Hon. Judge Deborah K. Chasanow, U.S. District Court for the District of Maryland, and with the U.S. Department of Justice, National Criminal Enforcement Section, Antitrust Division. He is the author of numerous scholarly articles on antitrust law. Benchmark Plaintiff has named him an Antitrust Litigation Star three consecutive years, from 2013 to 2015 and Super Lawyers named him a "Rising Star" in 2016.

Michael B. Eisenkraft

Michael B. Eisenkraft is a Partner at Cohen Milstein and takes a leading role in prosecuting cases relating to the protection of commodity and financial markets for the firm and currently represents investors in the Natural Gas, KOSPI 200, LIBOR, Treasuries, and Interest Rate Swaps markets. He has also helped investors recover hundreds of millions of dollars in the Firm's mortgage-backed securities cases. Mr. Eisenkraft serves as the Administrative Partner for Cohen Milstein's New York office and chairs the firm's new business development committee.

His notable successes at Cohen Milstein include:

- HEMT MBS Litigation: $110 million settlement on behalf of investors in mortgage-backed securities issued and underwritten by Credit Suisse (final approval pending) after more than seven years of litigation, which included the first written decision certifying a Securities Act class of mortgage-backed securities in the country.
- RALI MBS Litigation: $335 million in settlements on behalf of investors in mortgage-backed securities issued by Residential Capital and underwritten by various investment banks after seven years of litigation.
- Harborview MBS Litigation: $275 million settlement on behalf of investors in mortgage-backed securities issued and underwritten by the Royal Bank of Scotland and its subsidiaries after more than six years of litigation.
- Dynex: $7.5 million settlement on eve of trial on behalf of investors in asset-backed securities. The decision certifying the class in the case was the first decision within the Second Circuit certifying a class of asset-backed bond purchasers under the 1934 Act.
- China MediaExpress: $12 million settlement with auditor defendant in case involving alleged fraud at Chinese reverse merger company China MediaExpress. One of the largest settlements with an auditor defendant in a case involving a Chinese reverse merger company.

Mr. Eisenkraft's current cases include:

- Total Gas & Power Antitrust and Commodities Litigation: Represents putative class in action against the energy company Total in case alleging antitrust violations and violations of the Commodity Exchange Act in connection with manipulation of the market for natural gas.
- NovaStar MBS Litigation: Securities Act litigation involving billions of dollars of mortgage-backed securities underwritten by the Royal Bank of Scotland, Wachovia and Deutsche Bank.
- Tower Research Capital: Commodity Exchange Act class action against a high frequency trading firm alleging manipulation of the market for KOSPI 200 futures contracts (the representative stock market index of South Korea) using spoofing or faked trades.
- LIBOR (Exchange Traded Class): Commodity Exchange Act and antitrust class action representing investors in Eurodollar futures injured by manipulation of LIBOR by world's largest banks.
- Interest Rate Swaps: Represents Public School Teachers' Pension and Retirement Fund of Chicago and putative class in action alleging that major investment banks conspired to prevent an exchange-traded market for interest rate swaps from developing.

Mr. Eisenkraft served as a law clerk to the Honorable Judge Barrington D. Parker of the United States Court of Appeals for the Second Circuit. He is the author or co-author of numerous articles on legal issues in the securities and antitrust fields among other subjects. Mr. Eisenkraft attended Brown University, where he received a B.A., *magna cum laud*e and Phi Beta Kappa, and graduated *cum laude* from Harvard Law School.

Michelle C. Yau

Michelle C. Yau is a Partner at Cohen Milstein, and a member of the Firm's Employee Benefits (ERISA) Practice Group. In her role, Ms. Yau represents the interests of employees, retirees, plan participants or beneficiaries in ERISA cases. Her practice specializes in ERISA cases involving complex financial transactions or actuarial issues. Ms. Yau brings to her practice government experience enforcing labor statutes and a grasp of complex

financial instruments gained from her training as a financial analyst. Drawing on those experiences, she is able to fulfill her passion for protecting pension plan participants.

Ms. Yau litigated some of the most significant ERISA lawsuits to emerge from the Madoff Ponzi scheme. In re Beacon Assoc. Litig., she represented a multi-plan class of participants, beneficiaries and fiduciaries, which settled along with other consolidated cases for $219 million in 2013, representing 70% of the Class members' out-of-pocket losses. The judge praised the settlement, describing the outcome as "extraordinary" and the praising the "hard work" done by plaintiffs' counsel, including Cohen Milstein. In re Austin Capital Mgmt. Litig., which was settled by the Department of Labor on the ERISA class on very favorable terms, Ms. Yau alleged that Madoff's returns, based on his advertised investment strategy, were mathematically impossible, a fact Austin Capital ought to have recognized well before the fraud was revealed.

Prior to joining Cohen Milstein in 2007, Ms. Yau was an Honors Program Attorney at the Department of Labor where she enforced and administered of a variety of labor statutes. Before law school, she worked as a financial analyst at Goldman, Sachs & Co. in the Financial Institutions Group of the Investment Banking Division.

Ms. Yau is presently litigating a series of church plan lawsuits alleging that health care systems wrongfully claim their benefit plans are exempt from ERISA's protection. She oversees the day-to-day management of these cases, including coordinating all the aspects of the litigation.

Currently, Ms. Yau is representing clients in the following notable matters:

- St. Peter's Health care System Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Kaplan v. St. Peter's Healthcare System, which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections. In district court, Cohen Milstein succeeded in showing that only a church may establish a church plan and thus St. Peter's Healthcare System is not entitled to exemption from ERISA. Cohen Milstein then prevailed in the Third Circuit, which affirmed the district court's holdings.
- St. Anthony Medical Center Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Owens et al. v. St. Anthony Medical Center et al., which allege that the Medical Center violated numerous provisions of ERISA by improperly operating the plan as exempt from ERISA's protections. As a result the class of participants suffered cutbacks as much as 40% of their promised benefits.
- Trinity Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Lann et al. v. Trinity Health, which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections,
- Advocate Health Care Church Plan Litigation: Cohen Milstein, along with Keller Rohrback, is counsel to a class of defined benefit participants in Stapleton et al. v. Advocate Health Care Network and Facilities et al., which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections. In district court, counsel succeeded in showing that only a church may establish a church plan and thus Advocate is not entitled to exemption from ERISA. Plaintiffs then prevailed in the Seventh Circuit, which affirmed the district court's holdings.
- U.S. Bancorp Pension Plan Litigation: Cohen Milstein is counsel to a class of pension plan participants alleging that the plan's managers engaged in a risky, imprudent investment strategy by investing 100%

of its assets in stocks, thus causing the plan to lose more than $1 billion during the collapse of the equities market in 2008. Ms. Yau developed the litigation and is overseeing all aspects of the litigation.

Ms. Yau has litigated the following case successfully:

- Merrill Lynch ERISA Litigation: Cohen Milstein served as interim co-lead counsel in a class action alleging that fiduciaries of the Merrill Lynch retirement plans imprudently purchased and held inflated Merrill employer stock for the retirement accounts of the Companies' employees. The litigation was resolved for $75 million. Ms. Yau was engaged in all aspects of the litigation.
- Madoff Ponzi Scheme Litigation: Cohen Milstein represented a multi-plan class of participants, beneficiaries and fiduciaries in re Beacon Assoc. Litig. The $219 million settlement in 2013 represented 70% of the Class members' out-of-pocket losses. Ms. Yau was engaged in all aspects of the litigation.
- Weyerhauser Pension Plan Litigation: Cohen Milstein was lead counsel in a lawsuit alleging that the Weyerhaeuser Company caused its Defined Benefit Retirement Plans to engage in a risky investment strategy involving alternative investments and derivatives, causing the Plans' master trust to become underfunded. A settlement was reached for injunctive relief on behalf of Plans' participants and beneficiaries. Ms. Yau was engaged in all aspects of the litigation.

Ms. Yau received her law degree from Harvard Law School in 2003, where she was awarded several public interest fellowships, including the Heyman Fellowship for academic excellence and a demonstrated commitment to federal public service. Ms. Yau graduated Phi Beta Kappa with a B.A. in Mathematics from the University of Virginia. Ms. Yau was also selected as an Echols Scholar and awarded the Student Council Scholarship for leadership, academic achievement and community service. Law360 named Ms. Yau a Rising Star Under 40.

George F. Farah is a Partner at Cohen Milstein, and a member of the Antitrust and Human Rights practice groups. In this role, Mr. Farah represents consumers, farmers, unions and businesses that were injured by antitrust abuses in complex multi-district class action lawsuits.

He has experience in litigating all aspects of cases, from arguing motions in court to engaging in settlement negotiations to obtaining jury trial verdicts. In addition, Mr. Farah facilitates the development of new antitrust cases by investigating potential matters and securing clients to serve as class representatives.

Since joining the Firm in 2005, Mr. Farah has represented small businesses that were overcharged due to price-fixing conspiracies; unions and consumers in actions against pharmaceutical companies that thwarted generic competition; and farmers in lawsuits against processors that artificially depressed their wages. Mr. Farah has also advocated for victims of other tortious conduct. He represented the city of Milwaukee in a public nuisance case against lead paint manufacturers; survivors of the Holocaust in actions against companies who profited from Nazi-era slave labor; and political asylum applicants who were tortured in Nepal.

In addition to litigating, Mr. Farah has worked on electoral reform and income inequality issues. He founded the nonprofit Open Debates to improve the presidential debate process. He served as general counsel of The Living Wage Campaign to raise wages in Virginia. He reported on the harms of media concentration and the IMF's austerity programs at The Center for the Study of Responsive Law.

Currently, Mr. Farah is litigating the following notable matters:

- DairyAmerica Antitrust Litigation: Cohen Milstein is co-lead counsel in in Carlin v. Dairy America, Inc.(E.D. Cal.), accusing the largest marketer of nonfat dry milk in the U.S. and the California-based milk processing firm of inflating their profits at the expense of U.S. dairy farmers by misreporting data used by the U.S. government to set the price of raw milk. Mr. Farah is managing all aspects of the case. The case is ongoing.
- Treasury Securities Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that major banks and brokerages conspired to drive up futures prices for Treasury securities ahead of announced auctions and then colluded to deflate prices at auction. Mr. Farah is involved in all aspects of the case.
- In re Nexium Antitrust Litigation (D. Mass.): Cohen Milstein is co-lead counsel in a pay-for-delay litigation alleging that AstraZeneca PLC, the brand manufacturer of Nexium, paid generics manufacturers to delay the introduction of a generic version of the drug, thus harming consumers. The case is on appeal.
- In re Lidoderm Antitrust Litigation (N.D. Cal.): Cohen Milstein is co-lead counsel in a class action lawsuit alleging that Endo and Teikoku, the manufacturers of the Lidoderm pain patch, paid Watson Pharmaceuticals to delay its generic launch. The case is ongoing.

Some of his successes include:

- OSB Antitrust Litigation: $120 million settlement. Cohen Milstein was co-lead counsel in a case alleging that the nine producers of oriented standard board conspired to reduce the supply of OSB so as to increase prices. Mr. Farah was involved in all aspects of the litigation.
- Hydrogen Peroxide Litigation: $100 million settlement. Cohen Milstein was co-lead counsel in In re Hydrogen Peroxide Antitrust Litigation (E.D. Pa.) representing a class of direct purchasers of hydrogen peroxide in alleging a price-rigging conspiracy by manufacturers. The U.S. Third Circuit Court of Appeals opinion in Hydrogen Peroxide has proved important in clarifying the role of expert testimony in Rule 23 analysis. Mr. Farah was engaged in all aspects of the litigation.
- Northeast Dairy Litigation: In Allen vs. Dairy Farmers of America (D. Vt.), Cohen Milstein serves as lead counsel for one of two certified subclasses of Northeast dairy farmers against Dairy Farmers of America and Dairy Marketing Services in a raw milk price-fixing case. Defendant Dean Foods Co. settled for $30 million, and the Court has preliminarily approved a $50 million settlement with DFA and DMS.
- Nepali Nurse Political Asylum Litigation (Pro Bono): Mr. Farah acted as lead counsel in successfully securing political asylum in the U.S. for a Nepali nurse who had been persecuted and tortured for her religious beliefs in Nepal.

Mr. Farah is the author of the book "No Debate: How the Republican and Democratic Parties Secretly Control the Presidential Debates" (Seven Stories Press). His articles on legal and electoral issues have appeared in *The Washington Post, The Boston Globe, The Philadelphia Inquirer, Antitrust Magazine* and other publications.

Mr. Farah has appeared on over 50 television programs to discuss political, electoral and legal matters, including Nightline, NOW with Bill Moyers, 20/20, CBS Evening News, NBC Nightly News, FOX and Friends, Lester Holt Live and CNN's Market Call. He has been interviewed on over 100 radio shows and has hosted numerous televised press conferences. He has given several talks on the political process and electoral reform issues at colleges and universities.

Mr. Farah attended Princeton University, graduating with a B.A. from the Woodrow Wilson School of Public and International Affairs, and earned a J.D. at Harvard Law School. Mr. Farah was the recipient of a Paul and Daisy Soros Fellowship.

Kalpana Kotagal

Kalpana Kotagal is a Partner at Cohen Milstein, a member of the firm's Civil Rights & Employment practice group, and Chair of the firm's Hiring and Diversity Committee. Ms. Kotagal also plays an active role in the investigation and development of new potential matters for the Civil Rights & Employment practice group.

Ms. Kotagal has represented victims of discrimination in the workplace and in other settings. Ms. Kotagal also practiced as a member of the firm's Antitrust practice group. A noted speaker, Ms. Kotagal often is called on to address issues of opportunities and impediments to women's leadership, the ethics of multi-party and class cases, and class arbitration. She also speaks regularly to law students and new lawyers about their career paths.

Ms. Kotagal represents a class of approximately 44,000 female sales employees nationwide in a Title VII and Equal Pay Act case against one of the nation's largest jewelry chains in *Jock, et al. v Sterling Jewelers Inc*. Her clients have alleged a pattern of sex discrimination in compensation and promotions. This case presents cutting-edge issues regarding the certification of nationwide classes and litigating in arbitration. Ms. Kotagal also represents transgender beneficiaries of federal health insurance who have challenged the denial of transition-related care as discriminatory.

Ms. Kotagal's past successes include:

- U.S. Postal Service Disabled Veterans Litigation: Ms. Kotagal represented a class of disabled veteran applicants in *Hill, et. al v. Donohue, United States Postal Service*, alleging illegal pre-offer medical inquiries during the application process against the United States Postal Service. The case, which settled for $9.58 million, resulted in USPS's agreement implement changes in its practices to prevent similar violations in the future.
- Pilgrim's Pride Corporation: Ms. Kotagal represented 8,000 workers in 11 states in a wage and hour lawsuit in *Aaron v. Pilgrim's Pride Corp.*, seeking redress for unpaid overtime. The $10 million settlement allowed class members to recover about 85% of the back pay owed them.
- Nurse Wages Matters: Cohen Milstein represented nurses in an antitrust case in a case contending that hospitals conspired to suppress and fix wages of nurses.

Ms. Kotagal is a member of the Center for Worklife Law's Working Group on Pregnancy Accommodation of the National Employment Lawyers Association (NELA). She is also the co-author of "Innovation, Economics and the Law: The Health Care Industry's Exposure to Antitrust Liability," published by the ABA Antitrust Law Section in 2007.

Ms. Kotagal brings to her litigation practice her experience as an organizer, having previously served as field organizer with Green Corps, an Assistant National Field Director of the United States Public Interest Research Group, and as an advisor to a Congressional candidate in 2006. Ms. Kotagal also served as an honorary chair of the National Finance Committee of Young Lawyers for Obama in 2008.

While in law school, Ms. Kotagal served as law clerk in the Chambers of the Honorable J. Curtis Joyner, Eastern District of Pennsylvania. She served as an Articles Editor of the *University of Pennsylvania Law Review*.

Prior to joining Cohen Milstein, she served as a law clerk to the Honorable Betty Binns Fletcher of United States Court of Appeals for the Ninth Circuit.

Ms. Kotagal attended Stanford University, where she was a Morris K. Udall Scholar, and graduated with honors with an A.B.B.S. She earned her J.D. *cum laude* from the University of Pennsylvania, where she was a James Wilson Fellow.

Sharon K. Robertson

Sharon Robertson is a Partner at the firm and a member of the Antitrust practice group. Ms. Robertson Co-chairs the firm's Professional Development and Mentoring Committee and serves on the firm's Diversity Committee. Ms. Robertson also currently serves as a member of the Executive Committee for the Antitrust Section of the New York State Bar Association.

Ms. Robertson, who joined Cohen Milstein in 2006, has extensive experience in complex antitrust litigation at the pre-trial, trial and appellate levels and has been consistently recognized as a leading and highly regarded attorney. Within a span of two years, Ms. Robertson was a trial team member in two of the largest antitrust cases to be tried to verdict. In 2013, she was a member of the trial team in the Urethanes matter, where the jury returned a $400 million verdict, which was trebled by the Court, as required by antitrust law, to $1.06 billion. The judgment, one of the largest known antitrust verdicts to date, was cited by *The Legal 500* in ranking Cohen Milstein a leading class action plaintiff firm in 2015. The following year, Ms. Robertson was a member of the trial team in the Nexium matter, the first pharmaceutical antitrust case to go to trial following the Supreme Court's landmark decision in *FTC v. Actavis*, 570 U.S. 756 (2013).
Currently, Ms. Robertson leads a series of pay-for-delay pharmaceutical antitrust cases, alleging that the defendant brand manufacturer entered into non-competition agreements with generic pharmaceutical manufacturers in order to delay market entry of generic versions of certain drug products.

Ms. Robertson represents End-Payor Plaintiffs in the following pay-for-delay pharmaceutical antitrust cases in which the firm serves as Co-Lead Counsel:

- *In re Nexium Antitrust Litigation* (D. Mass.): Plaintiffs allege that AstraZeneca PLC, the brand manufacturer of Nexium, paid generics manufacturers to delay the introduction of a generic version of the drug, thus harming consumers and other end-payors. The case is on appeal.
- *In re Lipitor Antitrust Litigation* (D.N.J): Plaintiffs allege that Pfizer, the manufacturer of Lipitor, conspired with Ranbaxy, the generic manufacturer, to delay its introduction of a generic Lipitor product. The case is on appeal.
- *In re Loestrin Antitrust Litigation* (D.R.I.): Plaintiffs allege that Warner Chilcott PLC and three others entered into an agreement to delay the introduction of a generic version of the contraceptive drug Loestrin. Following a dismissal by the District Court, the First Circuit recently revived all of Plaintiffs' claims and remanded the case for further proceedings consistent with its opinion.
- *In re Lidoderm Antitrust Litigation* (N.D. Cal.): Plaintiffs allege that Endo and Teikoku, manufacturers of the Lidoderm patch, paid Watson Pharmaceuticals to delay its generic launch. The case is ongoing.

In addition, Ms. Robertson serves as a member of the executive committee in similar pay-for-delay cases in which Cohen Milstein plays a significant role, including: Niaspan (*In re Niaspan Antitrust Litigation* [E.D. Pa.]), Suboxone (*In re Suboxone Antitrust Litigation* [E.D. Pa.]), ACTOS (*In re ACTOS Antitrust Litigation* [S.D.N.Y.]),

Aggrenox (*In re Aggrenox Antitrust Litigation* [D. Conn.]) and Solodyn (*In re Solodyn Antitrust Litigation* [D. Mass.]).

Ms. Robertson has successfully litigated the following notable matters:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is Co-Lead Counsel in an antitrust class action alleging a nationwide conspiracy to fix the prices of polyether polyols. Ms. Robertson played a leading role in helping obtain settlements with several defendants for $139 million and was a member of the trial team that obtained a $400 million jury verdict (trebled to more than $1 billion), which was affirmed on appeal by the 10th Circuit. The case against Dow ultimately settled for $835 million while Dow's petition for certiorari was pending before the Supreme Court.
- Albany and Detroit Nurses Litigation: Cohen Milstein represented registered nurses employed by hospitals in Albany and Detroit in class actions alleging a wage-fixing conspiracy. Ms. Robertson obtained settlements with five Albany Defendants totaling over $14 million. In the Detroit case, Ms. Robertson helped obtain $98 million in settlements with eight Defendants.
- Indonesian Villagers Litigation: Ms. Robertson represented Indonesian villagers in a lawsuit against Exxon Mobil over torture and extrajudicial killings allegedly committed by the Defendant's security forces (a unit of the Indonesian military).

Ms. Robertson attended the State University of New York at Binghamton, where she graduated*magna cum laude* with a B.A. in Philosophy, Politics and Law. She earned her J.D. from the Benjamin N. Cardozo School of Law, where she served as Notes Editor of the *Cardozo Public Law, Policy and Ethics Journal*.
Ms. Robertson has authored "Comparing the U.S. Class Action Mechanism and the Proposed U.K. System: Which Strikes the Right Balance Between Safeguards and Justice," *Competition Policy International Antitrust Chronicle*. In addition, she assisted the Trial Practice Committee of the American Bar Association in revising the 2005 Edition of the *Model Jury Instructions* handbook.

Prior to attending law school, Ms. Robertson worked on the campaign committee of Councilman John Liu, the first Asian American to be elected to New York City's City Council. During law school, she was an intern in the Litigation Bureau of the Office of the New York State Attorney General and the United States Court of Appeals for the Second Circuit. Additionally, in law school, Ms. Robertson was selected as an Alexander Fellow and spent a semester serving as a full-time Judicial Intern to the Hon. Shira A. Scheindlin, U.S. District Court for the Southern District of New York.

S. Douglas Bunch

S. Douglas Bunch, is a Partner at Cohen Milstein and a litigator in the firm's Securities Fraud & Investor Protection Practice Group.

Mr. Bunch represents individual and institutional investors in cases brought in violation of state and federal securities laws, including the Securities Act of 1933 and the Securities Exchange Act of 1934. Currently, Mr. Bunch is part of the Cohen Milstein team litigating a class action suit against Harman International Industries, Inc., in which Cohen Milstein was successful in obtaining a ruling by the Court of Appeals for the D.C. Circuit reversing the dismissal of the case and remanding it to the U.S. District Court for further proceedings. The ruling protects investors by limiting the scope of protection afforded by the so-called "safe-harbor" for forward-looking statements in the Private Securities Litigation Reform Act of 1995. Mr. Bunch also recently

played a key role in the litigation and settlement of securities class actions against ITT Educational Services, Inc. and Orthofix International N.V., in which the U.S. District Court for the Southern District of New York denied defendants' motions to dismiss.

Mr. Bunch played an important role in successfully litigating the suits that followed in the wake of the 2008 financial crisis. He was instrumental in the $90 million settlement, following an appeal to the U.S. Court of Appeals for the Second Circuit, of Rubin v. MF Global, Ltd. in 2011. The complaint asserted that although MF Global had assured investors in its IPO that the Company had a rigorous, robust system of risk controls in place capable of monitoring risk on a continuous "real time" basis, MF Global in fact had deactivated trading and margin controls on brokers' computers to speed up transaction times. He was also a member of the litigation team that persevered in the $335 million global settlement of a class action lawsuit on behalf of purchasers of mortgage-backed securities (MBS) issued by Residential Accredit Loans, Inc. (RALI), the $275 million settlement of a class action lawsuit on behalf of purchasers of MBS issued by Harborview Mortgage Loan Trusts, and the $500 million settlement of a class action lawsuit on behalf of purchasers of MBS issued by Bear Stearns & Co. Inc., among other MBS cases.

A member of Phi Beta Kappa, Mr. Bunch graduated with a B.A., *summa cum laude*, from the College of William & Mary, earned an Ed. M. from Harvard University, and received his J.D. from William & Mary Law School, where he was a recipient of the Benjamin Rush Medal in 2006. In 2011, he was awarded William & Mary's inaugural W. Taylor Reveley III award, recognizing alumni who have demonstrated a sustained commitment to public service. Mr. Bunch is co-founder and chairman of Global Playground, Inc., a nonprofit that builds schools in the developing world, and serves or has served on the boards of the Northeast Conference on the Teaching of Foreign Languages, Ascanius: The Youth Classics Institute, and Virginia21.

David Young

David A. Young is a Partner at Cohen Milstein and is a member of the Antitrust Practice Group, having joined the Firm in 2010. Mr. Young has extensive experience in complex antitrust litigation, class actions, appeals and litigating cases under the federal False Claims Act.

In his role, Mr. Young represents businesses and individuals in federal and state civil actions, with a focus on multi-district class actions and federal False Claims Act litigation. He has worked on antitrust issues in numerous industries, including pharmaceuticals, financial services, financial derivatives and PC microprocessors. Mr. Young also represents qui tam relators in federal False Claims Act litigation.

Prior to joining Cohen Milstein, Mr. Young practiced at two other firms where his litigation practice focused on antitrust, trademark, business, and False Claims Act litigation. He represented the relator in U.S. ex rel. Loughren v. UnumProvident Corp. (D. Mass), where a jury found that UnumProvident violated the False Claims Act by causing the submission of false claims for Social Security disability benefits. Mr. Young also represented U.S. trademark holders suing to prevent the illegal importation of products bearing their marks in federal court and administrative actions.

Currently, Mr. Young is litigating the following notable matters:

- Automotive Parts Antitrust Litigation: In In re Automotive Parts Antitrust Litigation (E.D. Mich.), Cohen Milstein represents direct purchasers of wire harnesses, bearings and other automotive parts, who

were overcharged as a result of price-fixing and bid-rigging conspiracies by various sets of defendants throughout the automotive parts industry for more than a decade. The litigation follows upon a U.S. Department of Justice price-fixing case against auto parts manufacturers.

- Domestic Drywall Antitrust Litigation: Cohen Milstein is co-lead counsel in antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices and restrain price competition. To date, settlements for $44.5 million have been reached with two of the defendants. Mr. Young has been a core member of the team, involved in all aspects of the litigation. Defendants' motions for summary judgment were recently denied for all but one defendant, and the case is ongoing.
- Google Wiretap Antitrust Litigation: Cohen Milstein is co-lead counsel in a nationwide class action lawsuit alleging Google violated the Wiretap Act when its StreetView vehicles collected data from unencrypted Wi-Fi networks, including the home networks of individuals. The litigation has survived a motion to dismiss, which Google unsuccessfully appealed on an interlocutory basis in the Ninth Circuit. Currently, the firm is in the midst of jurisdictional discovery. The case is ongoing.

His successes include:

- Community Health Care System Litigation: Cohen Milstein was co-counsel representing an emergency room doctor and nurses in a whistleblower lawsuit under the False Claims Act alleging Community Health Care System defrauded the federal government in connection with health care bills. The case was resolved for $94 million.
- Hy-Ko Products Antitrust Litigation: Cohen Milstein represented Hy-Ko Products Co., a manufacturer of replacement keys and key replacement machines, in an antitrust litigation alleging that its competitors, the manufacturer of replacement keys and the manufacturer of key replacement machines, had acted to restrain competition and to monopolize the market. The litigation was resolved to the client's satisfaction.

Mr. Young attended Bridgewater College, where he graduated with a B.A. in Physics, and earned his J.D. from Harvard Law School, where he served as an Executive Editor for the Harvard Civil Rights-Civil Liberties Law Review. While still in law school, he represented clients in disability and discrimination cases as a member of Harvard's clinical programs, worked as a research assistant for Professor Christine Jolls and volunteered as a summer legal intern at the Whitman-Walker Clinic, a community-based center providing a range of health care services in Washington, D.C.

Mr. Young is a member of the ABA Section of Antitrust Law. He has represented pro bono clients in discrimination actions before the D.C. Circuit and D.C. District courts, including successfully arguing for reversal of the district court's dismissal of his client's case in Miller v. Hersman, 594 F.3d 8 (D.C. Cir. 2010).

Laura Alexander

Laura Alexander is a Partner in the Antitrust practice at Cohen Milstein. Ms. Alexander joined the firm in 2012, bringing with her extensive experience in complex antitrust litigation, class actions and appeals. Prior to joining Cohen Milstein, Ms. Alexander also was a member of the trial team that successfully represented Charter Communications in what was, at the time, the largest litigated bankruptcy in U.S. history and successfully represented several clients before the United States Supreme Court.

Currently, Ms. Alexander is litigating the following notable matters:

- *Ideker Farms, et al. v. the United States of America:* Cohen Milstein represents Ideker Farms and another 350 plaintiffs located in six states along the Missouri River in a mass action lawsuit in the U.S. Court of Federal Claims alleging that the federal government took land and flooding easements over lands owned by farmers, violating the takings clause of the Fifth Amendment. Ms. Alexander has been involved in all aspects of the litigation. The case is set to go to trial in 2017.
- Sutter Health Antitrust Litigation: Cohen Milstein is co-lead in a monopolization case alleging Sutter Health, a large hospital chain in Northern California, has used anticompetitive contract terms and contracting practices to drive out competition and raise prices to insurers, self-insured employers and individual consumers to supracompetitive levels. Ms. Alexander has been involved in all aspects of the litigation.
- *Big Oak Farms, Inc. v. the United States of America:* Cohen Milstein represents a group of farmers along the Mississippi River in a Fifth Amendment takings case alleging that the U.S. Army Corps of Engineers intentionally flooded plaintiffs' land, without providing just compensation. Ms. Alexander has been involved in all aspects of the litigation.

Ms. Alexander's past successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants—Bayer, BASF, Huntsman, and Lyondell—settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, the jury returned a $400 million verdict for the plaintiffs, which the district court trebled under federal antitrust law to more than $1 billion. Ms. Alexander was a member of the trial team and had significant brief writing and witness preparation responsibilities. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment. Dow has petitioned the United States Supreme Court for review, and that petition is currently pending.

Ms. Alexander attended Reed College, earning a B.A. in Mathematics, and earned her J.D. *magna cum laude* from Georgetown University Law Center. Following law school, she served as a law clerk to the Honorable Judge M. Margaret McKeown on the United States Court of Appeals for the Ninth Circuit. She has authored or co-authored scholarly articles, including Prominent Market Definition Issues in Pharmaceutical Antitrust Cases, which recently appeared in *Antitrust*, an American Bar Association publication.

Emmy Levens

Emmy L. Levens, a Partner in the Firm's Washington, D.C. office, is a member of the Antitrust Practice Group. With nearly a decade of experience, Ms. Levens has particular expertise in complex antitrust litigation, class actions, and appellate litigation. Ms. Levens plays a central role in helping the antitrust group evaluate potential cases and chairs the Firm's Summer Associate Committee.

Currently, Ms. Levens is litigating the following notable matters:

- Flint Water Crisis: Ms. Levens represents a group of residents and businesses in Flint, Michigan, in a suit for damages sustained as a result of their exposure to toxic levels of lead and other bacteria. This important case is ongoing in the Eastern District of Michigan.
- Resistors Antitrust Litigation: Cohen Milstein serves as interim co-lead counsel in a proposed class action accusing the world's largest manufacturers of resistors of fixing prices. As a critical member of the team of lawyers representing the proposed class of direct purchasers, Ms. Levens has been involved in every aspect of the case from investigation to prosecution of the class's case which is currently ongoing in the Northern District of California.
- Truck Transmissions Antitrust Litigation: Cohen Milstein serves as co-lead counsel in a putative class action alleging Eaton – the largest manufacturer of Class 8 Transmissions in the United States – conspired with manufacturers of Class 8 Trucks to exclude a rival transmission manufacturer from the market. Ms. Levens has played an important role on the case from the beginning and has recently returned to the case to assist with the appeal.
- Northeast Dairy: In Allen vs. Dairy Farmers of America (D. Vt.), Cohen Milstein serves as lead counsel for one of two subclasses of dairy farmers challenging anticompetitive conduct in the Northeast which resulted in lower prices paid to farmers. Ms. Levens has served as one of the principle attorneys litigating this matter since its inception. To date, the case has recovered a historic settlement with former defendant Dean Foods Company and another settlement for $50 million in addition to industry-changing equitable relief has recently been preliminarily approved by the Court.

Some of her past successes include:

- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein served as co-lead counsel for plaintiffs alleging that the two largest manufacturers of IVIG and Albumin – life-saving therapies derived from blood plasma – conspired to reduce the supply, and increase the prices, of these therapies. Ms. Levens played an active role in the litigation, helping to obtain settlements totaling $128 million for hospitals and other direct purchasers.
- Bulk Bleach Litigation: Ms. Levens served as one of the key attorneys at Cohen Milstein representing a class of municipalities and other direct purchasers of bulk bleach in a case alleging that the two dominant manufacturers of bulk bleach in the Carolina's engaged in an illegal market allocation agreement. After successfully defeating multiple motions to dismiss, class counsel obtained a settlement that satisfied nearly all of the class's damages. In approving the settlement, Judge Gergel complimented counsel, stating that the, "whole case has been, I think, very professionally handled, skillfully handled."
- Asylum Appeal: Ms. Levens agreed to represent pro bono a Nepalese woman after her initial application for asylum was denied. The woman had previously advocated for democratic reforms in Nepal but was forced to leave her home country to escape Communist militias. Ms. Levens appealed the matter through two rounds of briefing to the Board of Immigration Appeals and up to the Fourth Circuit Court of Appeals. After successfully obtaining a new asylum hearing for her client, Ms. Levens negotiated an agreement that allowed her client to remain safely in the United States.

Ms. Levens was also a member of the Apple price-fixing litigation team recognized as "Legal Lions" by Law360. In addition to her work at the Firm, Ms. Levens has served as an adjunct Professor at Georgetown School of Law and is a Board member and Secretary of Global Playground, a nonprofit that builds schools in the developing world. She recently co-authored an article entitled, "Heightened Ascertainability Requirement Disregards Rule 23's Plain Language," which appeared in the Spring, 2016 issue of Antitrust magazine.

Prior to joining the firm, Ms. Levens worked as a staff law clerk at the U.S. Court of Appeals for the Seventh Circuit.

Ms. Levens attended the University of Kansas, graduating with honors, and earned her J.D. at UCLA Law School, graduating Order of the Coif. While at law school, Ms. Levens served as the Managing Editor for the UCLA Journal of Environmental Law and Policy, Director of the Downtown Legal Housing Clinic, and President of Moot Court.

Laura H. Posner

Laura H. Posner is a Partner at Cohen Milstein and a member of the firm's Securities Litigation & Investor Protection Practice Group.

Prior to joining the firm, Ms. Posner was appointed by the New Jersey Attorney General to serve as the Bureau Chief for the New Jersey Bureau of Securities – the top Securities Regulator for the State of New Jersey. In that capacity, Ms. Posner was responsible for administrating and enforcing the New Jersey Uniform Securities Law and regulations thereunder, as well as managing and overseeing the employees who staff the Bureau of Securities. Cases prosecuted under Ms. Posner's direction as Bureau Chief resulted in hundreds of millions of dollars in recoveries for New Jersey residents, as well as more than 20 criminal convictions. As Bureau Chief, Ms. Posner collaborated extensively with the Securities and Exchange Commission, the Department of Justice, and other state Attorneys General and securities regulators.

Previous to her appointment as Bureau Chief, Ms. Posner prosecuted securities fraud class actions and derivative actions on behalf of public pension funds, institutional investors, and unions nationwide, successfully recovering billions on behalf of defrauded investors, a role that she will continue at Cohen Milstein. Her notable successes include:

- *In re Schering-Plough Corp./ENHANCE Securities Litigation and In re Merck & Co., Inc. Vytorin/Zetia Securities Litigation*: Obtained $688 million for investors on the eve of trial, the third largest recovery ever achieved in the Third Circuit and District of New Jersey, the second largest securities fraud settlement ever against a pharmaceutical company and among the top 25 securities fraud settlements of all time.
- *In re The Mills Corporation Securities Litigation*: Obtained $202.75 million for investors, the largest recovery ever achieved in a securities class action in Virginia, and the second largest recovery ever in the Fourth Circuit.
- *In re WellCare Health Plans, Inc. Securities Litigation*: Obtained $200 million for investors, the largest recovery ever achieved in a securities class action in Florida, and the second largest recovery in the Eleventh Circuit.
-

Ms. Posner is the former Chairwoman of the North American Securities Administrators Association (NASAA) Enforcement Section Committee, and previously served on NASAA's Multi-Jurisdictional Action Committee, Technology Committee and State Legislation Committee. She also has served as a member of multiple committees of the Association of the Bar of the City of New York, including currently serving as a member of the Securities Litigation Committee, and previously serving as a member of the Securities Regulation and Consumer Affairs Committees.

Ms. Posner has regularly been named by *Super Lawyers* as a Rising Star and a Top Woman Attorney. She regularly speaks at conferences throughout the country, including for events sponsored by PIABA, FINRA, SIFMA, NASAA, SEC, the New York, New Jersey and Philadelphia Bar Associations and the ABA. Ms. Posner has been quoted in *The New York Times*, *The Wall Street Journal*, the *Star-Ledger*, NewJersey.com, *Asbury Park Press*, the *New Jersey Herald*, and *The Record*, and interviews with her appear on various cable news channels and in various publications.

Ms. Posner graduated with a B.A. in Political Science, *magna cum laude*, from the University of California, Los Angeles in 2001. She received her law degree at Harvard Law School in 2004, where she served on the Executive Editorial Committee for the Harvard *Women's Law Journal*.

Attorney Profiles – Of Counsel & Associates

Elizabeth Aniskevich

Elizabeth Aniskevich is an Associate at Cohen Milstein and a member of the firm's Securities Fraud & Investor Protection practice group. Prior to joining the firm in 2012, Ms. Aniskevich served as the Pro Se Clerk at the United States District Court for the Eastern District of Virginia in Alexandria, where she managed the pro se prisoner dockets of the seven district court judges.

Ms. Aniskevich has successfully litigated the following notable matters:

- IntraLinks: $14 million settlement. Cohen Milstein was lead counsel in the class action securities fraud litigation, which asserted violations of both the Securities Act and the Exchange Act. Ms. Aniskevich was involved in the class certification briefing and played a critical role in fact discovery, which included preparing for and taking more than 20 depositions and propounding extensive written discovery.
- Ebix Derivative Litigation: Lead counsel in a derivative lawsuit alleging questionable tax schemes and breach of fiduciary duty on the part of Ebix's board of directors in misrepresenting the company's financial results, organic growth, and internal controls over financial reporting. Ms. Aniskevich's role in the Ebix litigation included drafting the operative complaint. The litigation, which recently settled, resulted in the adoption of corporate governance measures including the appointment of a Lead Independent Director, increasing the number of directors on the corporate governance committee, and creating a director of audit and director of internal tax positions to report directly to the Audit Committee.
- ITT Educational Services Securities Litigation: $16.96 million settlement. Cohen Milstein was lead counsel in a class action lawsuit against ITT Educational Services and two officers for alleged material misrepresentations and omissions concerning ITT's liabilities under certain risk-sharing agreements it had entered into with third-party student lenders of ITT student loans. Ms. Aniskevich wrote the complaint and opposed the motion to dismiss.

She is currently litigating:

- Intuitive Surgical Inc. Derivative Litigation: A derivative lawsuit against Intuitive Surgical's directors and officers, asserting insider trading by officers and directors of Intuitive in connection with the cover-up of safety defects in the company's flagship product, the da Vinci robotic surgery system. Ms. Aniskevich has briefed numerous procedural motions in what has been a long, hard-fought legal battle. She is currently involved in fact discovery.

Ms. Aniskevich earned her B.A. at the University of Florida, graduating valedictorian of the College of Liberal Arts and Sciences, and received her J.D from American University's Washington College of Law, graduating *magna cum laude*, Order of the Coif. She interned at Cohen Milstein while in law school and was a Senior Staff Member of the *American University Law Review* and served as a Research Assistant to her criminal law professor, Professor Ira P. Robbins. She was the recipient of the Clair A. Cripe award for outstanding performance in correctional law.

Luke Bierman

Luke Bierman is Of Counsel to Cohen Milstein, and adviser to the Firm's Ethics and Fiduciary Counseling and Securities Litigation & Investor Protection practice groups. Mr. Bierman's role is to counsel pension funds and public entities on fiduciary, ethics, governance and compliance issues. He joined Cohen Milstein in 2011, bringing with him a singular perspective and substantive experience as in-house counsel to one of the leading pension funds in the country, appointments to state task forces to review the state code of judicial ethics and professionalism, and a scholarly and academic background as the Dean and Professor of Law at a rising law school that President Bill Clinton has called "interesting and innovative." His experience provides him with a unique context for assisting public pension funds at critical and challenging times for those funds, and to offer collaborative and creative solutions.

Mr. Bierman served from 2007 to 2010 as General Counsel for the Office of the New York State Comptroller, the sole trustee of the state's then $150 billion pension fund and the state's chief fiscal officer for the state of New York's then $130 billion budget. This was during the period when the Office of the Comptroller faced unprecedented challenges including an international placement agent scandal and the Great Financial Crisis, and Mr. Bierman led the review of policies and procedures in the Office. In this role, Mr. Bierman managed a legal staff that included 55 attorneys, and was responsible for legal advice and counsel on all matters relating to the comptroller's constitutional and statutory responsibilities, including fiduciary, governance, ethics, litigation, investment, pension benefits, state and municipal finance and legislative matters. He also managed the 35 outside law firms that represented the Comptroller in litigation and transactional matters.

Mr. Bierman is a noted expert on legal ethics and professionalism, who has spoken and written widely about state courts and judicial conduct. He currently serves as a member of the North Carolina Commission on Administration of Law and Justice and on the North Carolina Chief Justice's Commission on Professionalism. He was a member of the Massachusetts Supreme Judicial Court's Task Force on the Code of Judicial Conduct, which was assigned to review and suggest updates to the Court. He served on the ABA Presidential Task Force on Financing Legal Education and the ABA Presidential Task Force on Legal Access JobCorps. While working at the American Bar Association, Mr. Bierman initiated the project that resulted in revisions to the Model Code of Judicial Conduct (2007), which many states have since adopted.

Mr. Bierman is the Dean and Professor of Law at Elon University School of Law in Greensboro, North Carolina, an innovative law school that blends the most important traditional elements of legal education with highly experiential learning in the nation's first 2½ year JD program. Previously, Mr. Bierman was the Associate Dean for Experiential Education and Distinguished Professor of Practice of Law at Northeastern University School of Law in Boston, where he was responsible for Northeastern's Cooperative Legal Education Program.

Earlier in his career, Mr. Bierman served as a Fellow in Government Law and Policy at Albany Law School. He also has served as Director of the Institute for Emerging Issues at North Carolina State University, where he held the rank of Associate Professor of Political Science; as Founding Director of the Justice Center and Special Assistant to the President of the American Bar Association; as Visiting Specialist in Constitutional Law with the rank of Associate Professor at The Richard Stockton College of New Jersey; and as law clerk to the Presiding Justice and an Associate Justice as well as Chief Attorney of the New York Supreme Court, Appellate Division, Third Department. Mr. Bierman also has taught at Northwestern University School of Law, the University at Albany and Trinity College in Hartford.

Mr. Bierman is widely published for his legal analysis and is a frequent lecturer and commentator about corporate governance reform, fiduciary responsibility and ethics and justice reform. He was a member of the board of directors of the Council of Institutional Investors, where he co-chaired the policies committee.

Mr. Bierman earned his Ph.D. and M.A. in Political Science from the University at Albany; his J.D. from the Marshall Wythe School of Law of the College of William and Mary, where he was a member of the Law Review; and his B.A. in American Political History magna cum laude with High Honors from Colgate University, where he was elected to Phi Beta Kappa. He is an elected member of the American Law Institute.

Mary J. Bortscheller

Mary J. Bortscheller is an Associate at Cohen Milstein, and a member of the Firm's Employee Benefits Practice Group. In that role, Ms. Bortscheller represents the interests of employees, retirees, and plan participants and beneficiaries in ERISA cases in the district court and on appeal. Ms. Bortscheller is a strong, hands-on, strategic litigator, thoroughly versed in the complexities of ERISA law.

At present, Ms. Bortscheller is engaged in litigating a number of so-called "church plan" lawsuits. These cutting-edge legal cases assert that many non-profit health care systems in the United States wrongfully claim their benefit plans are exempt from ERISA regulation under the church plan exemption. Currently, Cohen Milstein serves as lead or co-lead counsel in 12 separate cases in various jurisdictions throughout the U.S.

Ms. Bortscheller is currently litigating the following matters:

- Trinity Health Corporation Church Plan Litigation: Cohen Milstein is co-lead counsel in Lann v. Trinity Health Corp., a lawsuit alleging that Trinity is violating numerous provisions of ERISA while wrongfully claiming that its defined benefit pension plan is exempt from ERISA because it is a church plan. Ms. Bortscheller is Lead Associate in the case, engaged in all aspects of the litigation including motions practice, discovery, the mediation process and finalizing the settlement. The case is ongoing.
- Catholic Health East Church Plan Litigation: Cohen Milstein is co-counsel in Chavies v. Catholic Health East, alleging that the health care system wrongfully claims its defined benefit pension plan is exempt from ERISA as a church plan. As the Lead Associate on this case, Ms. Bortscheller works on all aspects of the lawsuit, including fact and expert discovery, the mediation process and in finalizing the settlement. The case is ongoing.
- U.S. Bancorp Pension Plan Litigation: Cohen Milstein is co-lead counsel to an interim class of pension plan participants alleging that the plan's managers engaged in a risky, imprudent investment strategy by investing almost 100% of its assets in stocks, thus causing the plan to lose more than $1 billion during the collapse of the equities market in 2008. As Lead Associate on the case, Ms. Bortscheller is involved in all aspects of the litigation, including the initial case investigation and drafting of the complaint, motions practice, discovery and the appellate process. The case is ongoing.

In addition to her ERISA case work, Ms. Bortscheller represents, pro bono, unaccompanied minor clients in immigration proceedings. Prior to joining Cohen Milstein in 2013, Ms. Bortscheller practiced at a boutique commercial litigation firm based in Chicago, where she represented plaintiffs in antitrust and qui tam matters, as well as defendants in general commercial litigation.

Ms. Bortscheller graduated from Gustavus Adolphus College with a B.A., cum laude, in Political Science, and received her J.D., cum laude, from American University, Washington College of Law. During law school, she served as Features Editor and Senior Editor of Sustainable Development Law & Policy and was a staff member of the American University International Law Review. Ms. Bortscheller served as a judicial intern with the United States District Court for the District of Minnesota.
Before attending law school, Ms. Bortscheller served in the United States Peace Corps teaching English as a foreign language in Sichuan Province, China. Following law school, she was a volunteer for the Chicago Legal Clinic, Inc.'s Foreclosure Defense Project.

Brian E. Bowcut

Brian E. Bowcut is Of Counsel at Cohen Milstein, and a member of the firm's Public Client Practice Group. Mr. Bowcut represents state Attorneys General and other public-sector clients as outside counsel in investigations and lawsuits involving fraudulent and deceptive trade practices. Mr. Bowcut, who joined the firm in 2015, brings with him deep experience representing the federal government in complex litigation and in enforcement investigations. In his role as a senior lawyer in the Public Client Practice, he brings this experience to bear in false claims and consumer fraud enforcement at the state and local levels.

Mr. Bowcut formerly was a Trial Attorney in the Civil Division of the U.S. Department of Justice for nine years. Most recently, as a member of the Fraud Section, he investigated and litigated fraud across an array of government programs, from Medicare fraud by nursing facilities, hospices and medical device makers to schemes involving federal mortgage, foreign aid, and TARP funds. Before that, as a member of the Environmental Torts Section, he defended the United States as lead counsel in large-scale toxic tort litigation. Prior to joining DOJ, Mr. Bowcut was at a preeminent national law firm, where he specialized in pharmaceutical product liability and commercial litigation.

Currently, Mr. Bowcut is representing public clients in the following high-profile matters:

- Prescription Painkillers: Represents the City of Chicago and other clients in litigation and investigations concerning deceptive marketing of highly addictive prescription opioid. Overprescribing of these drugs for chronic pain has fueled a dramatic rise in addiction, overdose, and death in communities across the nation. Mr. Bowcut manages and oversees the day-to-day litigation and investigations of these matters, which are ongoing.
- Nursing Homes: Represents the New Mexico Attorney General in Medicaid and consumer fraud litigation over inadequate staffing and deficient care at a chain of nursing homes. Mr. Bowcut briefed and successfully argued the recent motion to dismiss. The case is ongoing.

While at DOJ, Mr. Bowcut successfully handled various matters, including:

- Investigating reckless origination of FHA mortgage loans by multiple large lenders, and obtaining $200 million settlement from U.S. Bank.
- Investigating fraudulent diversion of TARP funds by Arkansas bank official and negotiating settlement with his estate.
- Serving as lead counsel for the federal government in long-running herbicide drift litigation by more than 100 farms in southern Idaho and securing dismissal of all claims against the government.

- Representing the interests of the EPA and other United States agencies in consolidated litigation over thousands of first responders' toxic exposures at the World Trade Center disaster site.

Mr. Bowcut attended Utah State University, graduating summa cum laude with a B.A. in Journalism and Political Science. He earned his J.D. from Duke Law School, graduating cum laude and Order of the Coif, and also earned an M.A. in Public Policy from Duke. During law school, Mr. Bowcut was an Articles Editor for the Duke Law Journal. After law school, he clerked for the Honorable Stanley S. Brotman of the United States District Court for the District of New Jersey.

Molly J. Bowen

Molly J. Bowen is an Associate at Cohen Milstein and a member of the Public Client practice group. Ms. Bowen's practice focuses on the representation of state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud as well as other fraudulent and deceptive trade practices.

Prior to joining Cohen Milstein, Ms. Bowen practiced at a leading firm in Miami, litigating False Claims Act claims, antitrust and securities class actions, and legal malpractice claims. She also was a law clerk to the Honorable Karen Nelson Moore of the United States Court of Appeals for the Sixth Circuit.

Ms. Bowen graduated *magna cum laude* from Macalester College with a B.A. in Geography in 2007. She earned her J.D., *summa cum laude*, from Washington University School of Law in 2013, where she was a member of the Appellate Clinic and served as the Articles Editor for the *Washington University Law Review*. Additionally, during law school, Ms. Bowen externed at the Service Employees International Union (SEIU) legal department and at the American Civil Liberties Union of Eastern Missouri.

Jamie Bowers

Jamie Bowers is an Associate at Cohen Milstein and a member of the Firm's Employee Benefits Practice Group. In her role, Ms. Bowers represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases across the country.

Prior to joining Cohen Milstein, Ms. Bowers served as a judicial law clerk for the Honorable Gary R. Jones at the United States District Court for the Northern District of Florida, Gainesville Division. In this role she dealt with a variety of issues arising under federal law, including initial criminal appearances, plea changes, writs of habeas corpus, prisoner litigation, employment litigation, personal injury litigation, civil rights litigation, mass torts litigation, social security disability, and various matters under the Federal Rules of Civil and Criminal Procedure.

Ms. Bowers attended Duke University, graduating with a B.A. in Environmental Science in 2011. She earned her J.D. from Georgetown University Law Center in 2014. During law school, Ms. Bowers served on the Executive Board as the Administrative Editor of the *Georgetown Environmental Law Review*.

Ms. Bowers is the author of *Environmental Justice Implications of the Current Hydraulic Fracturing Regulatory Regime*, 32 Mich. Env. L. Jour. 93 (2013).

Robert A. Braun

Robert A. Braun is an Associate in the Antitrust practice group, having joined Cohen Milstein in 2014. In this role, he represents businesses and individuals in federal civil actions with a focus on class actions and antitrust litigation. Mr. Braun also has experience in international claims litigation, including representing the victims of state-sponsored terrorism.

Currently, Mr. Braun is litigating the following notable matters:

- *Anadarko Basin Oil and Gas Lease Antitrust Litigation*: Counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies conspired to rig bids for leases of land held by private landowners in parts of Oklahoma, Kansas, Texas and Colorado. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy.
- *In re Cast Iron Soil Pipe and Fittings Antitrust Litigation* (E.D. Tenn.): Cohen Milstein is co-lead in a class action lawsuit alleging price-fixing in the cast iron soil pipe and fittings market and challenging the defendants' efforts to maintain a duopoly and restrain competition from foreign competitors. The plaintiffs have defeated the defendants' motions to dismiss.
- *In re Ductile Iron Pipe Fittings Antitrust Litigation* (D.N.J.): Cohen Milstein is co-lead in a class action litigation alleging price-fixing of ductile iron pipe fittings and monopolization of the American-made ductile iron pipe fittings market. The court denied defendants' motions to dismiss and the plaintiffs have settled with two of the defendants.
- Iran Beirut Bombing Litigation: Cohen Milstein is representing the victims and family members of victims in the 1983 Beirut Marine Barracks bombing, the deadliest act of terrorism against Americans prior to September 11, 2001.
- Iraq Hostage Spouses Litigation: Cohen Milstein is representing the spouses of 30 Americans held hostage by former Iraq President Saddam Hussein during the Gulf War in 1990. After toppling Saddam Hussein's regime, the United States settled the hostage spouses' legal claims with Iraq, but has refused to compensate the hostage spouses out of the resulting settlement fund. Cohen Milstein alleges that these actions by the United States are a taking without just compensation in violation of the Fifth Amendment of the U.S. Constitution.
- Inmate Calling Services Provider Litigation: Cohen Milstein is on the executive committee in several nationwide class action lawsuits alleging that the providers of inmate calling services have charged inmates and their families unjust and unreasonable rates in violation of the Federal Communications Act and various state laws.

Prior to joining Cohen Milstein, Mr. Braun served as a law clerk for the Honorable Carolyn Dineen King of the U.S. Court of Appeals for the Fifth Circuit from 2013-2014, and for the Honorable Lee H. Rosenthal of the U.S. District Court for the Southern District of Texas. He was also an Arthur Liman Fellow at Southeast Louisiana Legal Services, where he worked on public interest housing litigation.

Mr. Braun earned his J.D. at Yale Law School and attended Princeton University, graduating *summa cum laude* with a B.A. in Sociology. During law school, Mr. Braun was an editor of the *Yale Journal of International Law* and a member of the mock trial team.

Admitted only in New York and Louisiana. Practice limited to matters and proceedings before federal courts and agencies.

Jay Chaudhuri

Jay Chaudhuri is Of Counsel at Cohen Milstein and joined the firm in 2016. He is based in Cohen Milstein's Raleigh, NC office.

Mr. Chaudhuri, who currently serves in the North Carolina State Senate representing parts of Raleigh, Cary and Morrisville, joins former North Carolina Court of Appeals Judge Martha Geer, who launched Cohen Milstein's Raleigh office in early 2016. Together, Mr. Chaudhuri and Ms. Geer will partner with law firms across the state to protect the rights of North Carolina's citizens and small businesses.

Mr. Chaudhuri has spent his career fighting and working on behalf of the people of North Carolina. As one of the newest state senators, he serves on the Commerce, Pensions & Retirements and Aging, Judiciary II, State and Local Government, and Appropriations on General Government and Information Technology committees. During his first legislative session, Mr. Chaudhuri co-sponsored a bill to repeal House Bill 2, a bill critics have referred to as the most anti-LGBT legislation in the country.

Prior to his appointment to the State Senate, Mr. Chaudhuri served as General Counsel & Senior Policy Advisor to State Treasurer Janet Cowell, where he helped recover more than $100 million for the pension and unclaimed property funds, including settlements from an investment manager and custodian bank. He also played a key role in uncovering alleged wrongdoings that involved eight investment managers, leading to a reimbursement of $15 million back into the pension fund and tougher, cutting edge ethical standards. Mr. Chaudhuri also served as Chair of the Council of Institutional Investors, an association of pension funds with combined assets of more than $3 trillion, which serves as the leading voice for effective corporate governance and strong shareholder rights.

Before joining the Department of State Treasurer, Mr. Chaudhuri served as Special Counsel to Attorney General Roy Cooper, where he helped lead an investigation by all 50 Attorneys General that resulted in a landmark agreement with two leading networking sites to better protect children from Internet predators. For his efforts, the National Association of Attorneys General honored him with the Marvin Award, given to an individual who furthers that association's goals.

The North Carolina Bar Association has awarded Mr. Chaudhuri its Citizen Lawyer Award, given to lawyers who provide exemplary service to their communities. *Lawyers Weekly* has also honored him with its Leaders in the Law award. In addition, he has been awarded the William C. Friday Fellowship, Henry Toll Fellowship, and American Marshall Memorial Fellowship.

Mr. Chaudhuri graduated from Davidson College, Columbia University School of International and Public Affairs, and North Carolina Central University School of Law (*cum laude*).

Robert W. Cobbs

Robert W. Cobbs is an Associate at Cohen Milstein, and a member of the Antitrust practice group.

Currently, Mr. Cobbs is litigating the following notable matters:

- Anadarko Basin Oil and Gas Lease Antitrust Litigation: Co-lead counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies

conspired to rig bids for leases of land held by private landowners in parts of Oklahoma and Kansas. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy. Plaintiffs allege that Defendants illegally conspired to stabilize and depress the price of royalty and bonus payments paid to landowners in the Anadarko Basin oil and gas province — a massive geological formation holding natural gas and oil deposits that includes large parts of Oklahoma and Kansas. Pursuant to this conspiracy, Plaintiffs allege that Defendants communicated about and agreed on prices, allocated particular geographic areas between themselves, and rigged bids for leases of land, lowering acquisition prices across the region and thereby harming the proposed class of landowners.

- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company — the three largest dental supply and dental equipment distributors in the United States — fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays.

Prior to joining Cohen Milstein, Mr. Cobbs clerked for the Hon. Pierre N. Leval, United States Court of Appeals for the Second Circuit; and for the Hon. J. Rodney Gilstrap, United States District Court for the Eastern District of Texas.

Mr. Cobbs graduated from Amherst College with a B.A. in English and Russian, *magna cum laude* with distinction, and received his J.D. from Yale Law School. During law school, he served as a Notes Editor of the *Yale Law Journal* and as a Submissions Editor of the *Yale Journal on Regulation*.

Shaylyn Cochran

Shaylyn Cochran is an Associate at Cohen Milstein and a member of the firm's Civil Rights & Employment Practice Group. Prior to joining Cohen Milstein, Ms. Cochran was a Relman Civil Rights Fellow, litigating federal fair housing and employment discrimination matters.

Ms. Cochran represents female employees alleging sexual discrimination against one of the nation's largest jewelry chains in Jock, et al. v. Sterling Jewelers Inc., a nationwide Title VII gender discrimination and Equal Pay Act case currently being litigated in arbitration. In Jock, the arbitrator recently certified a class estimated to include 44,000 current and former female retail sales associates, working at Sterling stores throughout the country, who have pay and promotions discrimination claims against the company. Ms. Cochran also is involved in a series of cases in Chicago alleging a pattern of race discrimination against African-American laborers, in which temporary staffing agencies and the client companies that they service have engaged in a practice of excluding African Americans from temporary laborer positions throughout the metropolitan area.

In addition to litigating several employment discrimination cases, Ms. Cochran also is part of the team representing the Equal Rights Center in Equal Rights Center v. Equity Residential, a federal fair housing lawsuit challenging Equity Residential's nationwide pattern or practice of designing and constructing multi-family housing complexes in violation of the accessibility requirements of the federal Fair Housing Act. The action

challenges FHA violations at 300 Equity Residential properties and seeks relief to ensure that Equity Residential's properties are accessible to people with disabilities and to enforce the standards of the FHA.

Ms. Cochran earned her B.S. and B.A. from Ohio University, graduating summa cum laude and Phi Beta Kappa, and her J.D. from Harvard Law School, where she received the Dean's Award for Community Leadership. While a law student, Ms. Cochran served as a litigation intern at the NAACP Legal Defense and Education Fund, and the Disability Rights Section at the U.S. Department of Justice, Civil Rights Division. For two years during law school, Ms. Cochran also was a student attorney at the Harvard Legal Aid Bureau, where she represented indigent clients on family law matters. She also served as president of the Harvard Black Law Students Association.

Brian Corman

Brian Corman is an Associate at Cohen Milstein and a member of the Civil Rights & Employment practice group. Mr. Corman's practice focuses on litigating civil rights, employment discrimination, and wage and hours cases. Prior to joining Cohen Milstein in 2015, Mr. Corman was an Associate in the Litigation group at a top-tier defendants' firm. There, he focused on Foreign Corrupt Practices Act internal investigations for Fortune 500 clients, as well as pro bono cases in federal district court and before the Supreme Court.

Currently, Mr. Corman is litigating a number of notable matters. He is involved in all aspects of litigation, including fact discovery, depositions and motions practice, on behalf of hundreds of Gentiva health care workers filing suit for unpaid overtime under the Fair Labor Standards Act. He represents Walmart workers in multiple federal district and appellate court cases alleging discriminatory pay and promotions practices in violation of Title VII of the Civil Rights Act. He also represents low-income minority renters in the Village of Mastic Beach who were evicted from their homes in violation of federal, state and local fair housing and civil rights laws.

Following law school, Mr. Corman clerked for the Honorable Harry Pregerson of the Ninth Circuit Court of Appeals. He then participated in a D.C. Bar Association Pro Bono Fellowship at the Lawyers' Committee for Civil Rights Under Law, working on education, voting rights and fair housing cases.

Mr. Corman earned his law degree from the University of California, Berkeley, School of Law, where he was an editor of the *California Law Review*, a member of the Jessup International Law Moot Court Team, co-chaired the Berkeley Law Expulsion Clinic, and externed for the Honorable William Alsup of the U.S. District Court for the Northern District of California. Mr. Corman received his B.A., *summa cum laude,* Phi Beta Kappa, in Political Science from Columbia University School of General Studies. Mr. Corman was a professional ballet dancer for eight years, performing with the Houston Ballet and Washington Ballet, among other companies.

Michael Dolce

Michael Dolce is Of Counsel at Cohen Milstein, and a member of the firm's Catastrophic Injury practice group. Mr. Dolce, who joined the firm in 2015, is a highly regarded trial lawyer and political activist who has dedicated his career to seeking justice for the victims of abuse. His practice focuses specifically on the victims of sexual abuse, sex crimes and domestic violence. He is a champion of children, representing child victims as well as adult survivors of child sex abuse who bear scars and injuries into adulthood. It is an experience he understands on a personal and visceral level: Having himself been the victim of sexual abuse as a young boy at

the hands of a sadistic predator, he arose from the trauma determined to be a voice for others and secure justice for them.

Mr. Dolce brings to his work the insight of a survivor who is determined to use his understanding and ability to communicate exactly what crime and injury victims go through, and what they need in their difficult and courageous healing processes. Among his noted work, in 2009, he achieved a jury verdict on behalf of a child abuse victim, totaling over $19.2 million, that was named by "Verdict Search" one of the top 100 verdicts nationwide that year.

In 2010, Mr. Dolce's six-year crusade in Florida's legislature culminated in the passage of sweeping legislation that repealed all statutes of limitation for civil and criminal prosecution of child sexual battery, overcoming a powerful and well-financed opposition. That victory was fueled by Mr. Dolce's testimony numerous times before legislative committees, which one major newspaper reported left senators "captivated" and "spellbound." His effort was supported by a grassroots organization of some 200 survivors that he led as the chair of the political committee, Protect Our Kids First, Inc., a campaign he formed to amend the state's Constitution on Election Day. His precedent-setting strategy worked to compel the Legislature to ensure that never again will a child in Florida be turned away from any civil or criminal court due to the passage of time. And no predator can ever again take comfort in the ticking of a clock after threatening a child into silence.

Mr. Dolce's work has gained him national recognition with awards from both fellow attorneys and crime victim advocates, including the National Center for Victims of Crime, the Florida Council Against Sexual Violence and the Florida Justice Association. Mr. Dolce is a sought-after speaker, having addressed conferences of many of the largest child abuse survivor organizations in the world, including the Survivors Network for those Abused by Priests. Recently, he was invited to join the Sexual Violence Focus Group of the Office of the Florida State Courts Administrator; the group will work over the next year on several sexual violence projects, including updating the Florida Sexual Violence Bench Book and developing a strategic plan for sexual violence projects. His work has been cited across the nation by law professors and judges, including the North Carolina Supreme Court.

Mr. Dolce graduated with a Bachelor of Arts, *summa cum laude*, from Lynn University and received his J.D. from Stetson University.

Currently, Mr. Dolce is litigating the following notable matters:

- *Jane Doe v. Florida Sheriffs Youth Ranches*: Mr. Dolce represents a teenaged sex abuse victim who was abused in a residential childcare facility by an adult resident of the facility. This civil suit against the facility follows a successful criminal prosecution of the abuser, asserting that the facility failed to maintain proper child safety procedures and policies.
- *Rose, Fitzsimons and Davis v. The Devereux Foundation, Inc.*: Mr. Dolce represents adult survivors in three related lawsuits, asserting child physical and sexual abuse at a licensed therapeutic group home perpetrated by several staff members.
- *Jane Doe v. Seagate Hotel and Spa*: Mr. Dolce represents an adult in this action against a resort hotel asserting that she was sexually assaulted by a massage therapist. The suit alleges that the hotel negligently hired the therapist who had been discharged just two months earlier by his prior employer for similarly sexually assaulting a guest.

- *Harris v. William Degray*: Mr. Dolce represents an adult survivor of domestic violence who suffered substantial physical and mental health injuries, including Battered Woman Syndrome.
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Some of his past successes include:

- *Jane Doe vs. Tim Crowe*: Mr. Dolce represented a child sex abuse survivor in a direct action against the perpetrator, resulting in a $19.2 million compensatory damage verdict, named one of the Top 100 verdicts nationwide in 2009 by *The National Law Journal*/Verdict Search.
- *Hollins v. Watchtower Bible and Tract Society of New York, Inc.*: Mr. Dolce represented an adult survivor of child sexual abuse against his former church (Jehovah's Witnesses), resulting in a confidential settlement.
- *A.S.W. v. Happy House, Inc.*: Mr. Dolce represented a pre-school child against a day care center in a child-on-child sex abuse case, resulting in a confidential settlement.
- *Jane Doe v. James Byrne and Linda Byrne*: Mr. Dolce represented a mentally disabled child in an action against a neighbor who sexually abused her over a two-year period and against the abuser's wife, on a theory that she failed to protect the child after finding evidence of ongoing abuse. The jury awarded damages of $3.5 million, ordering both defendants to pay.

Jeffrey Dubner

Jeffrey B. Dubner is an Associate at Cohen Milstein and a member of the Antitrust practice group, having joined the firm in 2011. In this role, Mr. Dubner represents a broad range of individuals, businesses, and unions in civil litigation, with a focus on multi-district class actions and antitrust litigation. He has represented both plaintiffs and defendants in antitrust matters, dealing with the application of the Sherman Act in industries from health care and financial services to professional sports and publishing.

Mr. Dubner is currently litigating the following matters:

- VFX/Animation Workers Litigation: Cohen Milstein is one of three court-appointed co-lead counsels in a litigation alleging that the major animation studios conspired to limit the opportunities and suppress the pay of special effects and animation workers by agreeing not to poach each other's employees. The litigation has survived a motion to dismiss and plaintiffs have moved for class certification. Mr. Dubner has been involved in all aspects of the litigation.
- Interest Rate Swaps: Cohen Milstein represents The City of Baltimore and the Public School Teachers' Pension and Retirement Fund of Chicago on behalf of a putative class in an action alleging that major investment banks conspired to prevent an exchange-traded market for interest rate swaps from developing. The case is currently pending centralization by the Joint Panel on Multidistrict Litigation.
- Sutter Health: Cohen Milstein represents self-insured entities in Northern California who are challenging anticompetitive practices by Sutter Health, the dominant hospital system in Northern California. Plaintiffs have defeated Sutter Health's motion to compel arbitration and demurrer, and the case is currently in discovery.
- Angola Prison/Louisiana Department of Public Safety and Corrections Litigation (pro bono): Mr. Dubner is co-lead counsel on a class action lawsuit alleging that the Louisiana Department of Public Safety and Corrections failed to provide adequate health care services to inmates at Angola Prison, the largest state-run maximum security prison in the United States. The case is currently in discovery.

Mr. Dubner played an important role in litigating the following successes:

- Electronic Books Antitrust Litigation: Cohen Milstein was co-lead counsel in a class action lawsuit alleging that Apple and five of the leading U.S. publishers conspired to raise the retail prices of ebooks. The five publishing defendants settled for $166 million and a settlement was reached with Apple for an additional $400 million. Mr. Dubner was lead associate on the case and was involved in all aspects of the litigation, including trial preparation.
- Sports Broadcasting Antitrust Litigation: Cohen Milstein was co-lead counsel for plaintiffs in class actions alleging that the system of geographical broadcasting territories employed by Major League Baseball and the National Hockey League amount to unlawful market allocation under Section 1 of the Sherman Act. The last settlements were reached on the eve of trial and are awaiting final Court approval. Mr. Dubner was lead associate on the NHL and MLB lawsuits and was involved in all aspects of the litigation, including arguing motions and examining witnesses before the court.
- Prime Healthcare Services Litigation: Cohen Milstein successfully defended the Service Employees International Union (SEIU) against antitrust claims brought by Prime Healthcare Services, alleging that SEIU conspired with Kaiser Permanente to drive Prime out of the market. Cohen Milstein succeeded in having the complaint and the amended complaint dismissed in the Southern District of California and defeating an appeal in the Ninth Circuit. Mr. Dubner was the lead associate on the case and was involved in all aspects of the litigation, including drafting the successful motions to dismiss and appellate brief.
- Detroit Nurse Wages Antitrust Litigation: Cohen Milstein represents a class of nurses in *Cason-Merenda v. Detroit Medical Center* (E.D. Mich.), alleging that Detroit hospitals suppressed wages through anti-competitive information exchanges. All eight defendants settled, creating a common fund of more than $90 million for Detroit's nurses. Mr. Dubner participated in the trial preparation for the case.

In addition to state and federal antitrust laws, Mr. Dubner has litigated claims under the Stored Communications Act, the Commodities Exchange Act, the Americans with Disabilities Act, and other state and federal statutes. *The National Law Journal* named him a Rising Star in 2015, one of only 40 attorneys in Washington, D.C., so honored.

Prior to joining the firm, Mr. Dubner was a law clerk for the Honorable Guido Calabresi of the U.S. Court of Appeals for the Second Circuit and the Honorable John G. Koeltl of the U.S. District Court for the Southern District of New York. Mr. Dubner attended Harvard University, graduating *cum laude*with a B.A. in Psychology, and earned his J.D. *magna cum laude* from Harvard Law School. Mr. Dubner served as a Notes Editor for the *Harvard Law Review*. Mr. Dubner is admitted to practice in New York, the District of Columbia, the Southern District of New York, and the Eastern District of Michigan. He is also a New York Times–published crossword constructor.

Suzanne Dugan

Suzanne M. Dugan is Special Counsel to Cohen Milstein and leads the firm's Ethics & Fiduciary Counseling practice, a practice she helped found within the Securities Litigation & Investor Protection practice group.

Ms. Dugan joined Cohen Milstein in 2011, following more than 20 years of service in government, first as counsel to and acting director of the New York State Ethics Commission and then as Special Counsel for Ethics for the Office of the New York State Comptroller. Her service in government and experience as an in-house counsel offer the broad and unique perspective of a regulator and the understanding of an in-house counsel.

From this unique vantage, Ms. Dugan counsels pension funds on fiduciary responsibility, ethical duties, strategic governance and compliance issues. She consults with governmental entities and other clients on design, implementation, management and assessment of comprehensive ethics programs. She also assists in conducting investigations and structuring recommendations, and provides expert legal and consulting services to law firms retained to conduct special reviews, providing an additional layer of oversight and accountability.

Ms. Dugan brings her experience gained from having served as ethics counsel to the third largest public pension fund in the country to advise and counsel pension fund trustees and senior managers on issues and challenges, providing collaborative and creative solutions for pension funds as they navigate changing economic challenges and organizational requirements.

At Cohen Milstein, Ms. Dugan has provided ethics counsel to some of the largest public pension funds, and serves as compliance counsel to another top 10 fund, among others. She has also conducted ethics and fiduciary training for the boards of trustees of some of the country's largest public pension funds. In addition, she serves as counsel to a number of large municipalities across the country, where she evaluates and investigates complaints of unethical conduct, provides objective and independent guidance and works to ensure a culture of ethical leadership.

Ms. Dugan is a frequent lecturer and panelist at conferences and forums addressing ethics and fiduciary issues in the public and nonprofit sectors, including pension funds, bringing with her an understanding of ethical issues born out of practical experience as well as scholarly pursuits. She has served as an adjunct professor, teaching a course on Government Ethics, and writes frequently on ethics, fiduciary responsibilities of pension trustees and the role of pension fund attorneys.

She serves on the Fiduciary and Plan Governance Steering Committee of the National Association of Public Pension Attorneys, a professional organization dedicated to providing legal educational opportunities and informational resources to its member attorneys. Ms. Dugan also is an active member of the Council on Government Ethics Laws, an international organization dedicated to issues involving governmental ethics, elections, campaign finance, lobby laws and freedom of information.

Ms. Dugan began her career as a judicial clerk with the Appellate Division, Third Department, of the New York State Supreme Court. She also served as an administrator at Albany Law School, as well as the pro bono Legal Director of a not-for-profit in the Albany area. She currently is a member of the Board of Directors of her local Planned Parenthood affiliate and an elected Trustee of the Clifton Park-Halfmoon Public Library.

Ms. Dugan attended Siena College, graduating *magna cum laude*, and earned her J.D. *cum laude* from Albany Law School of Union University. In 2014, she received the distinguished Burton Award for Legal Writing. She is an elected member of the American Law Institute, where she is a member of the Consultative Group on Government Ethics, among others.

Adam Farra

Adam Farra is an Associate at Cohen Milstein and a litigator in the firm's Securities Fraud & Investor Protection practice group. His practice primarily involves representing investor clients who have been injured by

corporate fraud perpetrated by publicly-traded companies. He also frequently represents individuals in civil rights and constitutional cases.

Representative examples of Mr. Farra's experience include the following:

- *Scinto v. Stansberry.* As lead counsel, Mr. Farra argued before a federal appeals court on behalf of a client alleging that federal prison officials violated the Eighth Amendment's prohibition on cruel and unusual punishment when they failed to provide him adequate medical care.
- *Fontanez v. O'Brien*. As lead counsel, Mr. Farra successfully argued before a federal appeals court on behalf of a client whose habeas petition was initially dismissed by the district court on jurisdictional grounds. In a unanimous, published opinion, the Fourth Circuit reversed and remanded the dismissal.
- *Richards v. Maryland.* As lead counsel, Mr. Farra argued before a Maryland appeals court on behalf of a client who challenged his criminal conviction on the grounds that the officers who arrested him violated the Fourth Amendment in a traffic stop-and-frisk case.
- *In re Ability, Inc. Securities Litigation.* Mr. Farra represents shareholders in a class action in federal court in Manhattan against Ability, Inc. and its directors and officers. The shareholders allege that the company and its officers violated federal securities fraud laws.

After law school, Mr. Farra clerked for Judge Andre M. Davis on the U.S. Court of Appeals for the Fourth Circuit and Judge Peter J. Messitte on the U.S. District Court for the District of Maryland. Prior to joining Cohen Milstein, Mr. Farra was a commercial litigator at a major law firm in Washington, D.C.

Mr. Farra also serves as an adjunct professor at the University of Maryland School of Law, where he teaches a seminar in constitutional law.

Mr. Farra is a graduate of the University of Michigan. He received his J.D. from the University of Maryland School of Law, from which he graduated *magna cum laude* and Order of the Coif.

Susan M. Greenwood

As an attorney in the New York office, Susan M. Greenwood is a member of Cohen Milstein's Securities Litigation & Investor Protection Practice Group. With extensive experience in the area of securities law and class action litigation, Ms. Greenwood analyzes and evaluates securities litigation case opportunities.

Prior to joining Cohen Milstein, Ms. Greenwood was a Securities Law Specialist at Bloomberg Law, providing analysis of trends and developments in securities litigation, regulation and enforcement and serving as the editor of the Bloomberg Law Securities Litigation and Enforcement Report. She also has served as counsel at a prominent insurance company and two large litigation firms.

Ms. Greenwood attended Cornell University, graduating cum laude with Distinction, and earned her J.D. at the University of Pennsylvania School of Law.

Elizabeth C. Guarnieri

Elizabeth C. Guarnieri is a Senior Attorney in Cohen Milstein's Securities Fraud & Investor Protection Practice Group, and a member of the Ethics and Fiduciary Counseling Practice. Ms. Guarnieri serves as the Firm's Director of Investor Services. In the role of Director of Investor Services, she leads the Firm's portfolio

monitoring and damage calculation process and oversees client reports. She is an integral member of the Securities Case Evaluation Team, which analyzes new and potential securities actions.

In addition, Ms. Guarnieri led the Cohen Milstein team in developing the Firm's proprietary portfolio monitoring and damage calculation system, COMPAS (Cohen Milstein Portfolio Assessment System). She also oversaw the rollout of the COMPAS client self-service portal which provides clients with web access to monitoring information as well as historical portfolio monitoring reports. She coordinates with our IT department and analysts to ensure the security of clients' transactional information.

Prior to joining Cohen Milstein, Ms. Guarnieri spent nearly 10 years as a securities and antitrust litigator. Working at two prominent plaintiffs' class action law firms in San Francisco, she represented individual and institutional investor clients in individual, class action and shareholder derivative securities litigation. Her decade of working on behalf of institutional investors has provided her with an experience and insight that she brings to her fiduciary and ethics counseling practice. Working with clients who have hired Cohen Milstein for fiduciary or ethics counseling, Ms. Guarnieri has undertaken a variety of projects — from researching and preparing presentations on fiduciary and ethics issues to assisting with the revision of an ethics code for a large county client.

In addition to her litigation experience, Ms. Guarnieri also worked as a legal analyst with Bloomberg L.P., regularly contributing articles to Bloomberg's Antitrust and Trade Law Reporter. She is the co-author of The Misapplication of American Pipe Tolling Principles, ABA Securities Litigation Journal, (Volume 21, Number 2, Winter 2011).

In her pro bono work, Ms. Guarnieri was one of a coalition of counsel that represented plaintiffs who sued Chevron for egregious injuries related to the company's oil production in Nigeria. She also served on the Board at the Meiklejohn Institute for Civil Liberties, an organization dedicated to developing innovative ways of using human rights law to promote equality and protect the disadvantaged.

Ms. Guarnieri attended Rider University, graduating magna cum laude with a B.A. in Political Science, and earned her J.D. at Rutgers School of Law.

Sally M. Handmaker

Sally M. Handmaker is an Associate at Cohen Milstein and a member of the firm's Consumer Protection practice group. In that role, Ms. Handmaker litigates actions to enforce consumer rights under federal and state laws.

Prior to joining Cohen Milstein in 2014, Ms. Handmaker was a Litigation Associate at a top-tier defense firm, working on complex commercial and general litigation matters in federal and state courts covering a variety of subject matters, including antitrust, securities litigation, sports, intellectual property and employment. She also maintained an active pro bono practice and, in particular, was recognized for her work with the Lawyers Committee for Civil Rights Under Law's Voting Rights Project.

Ms. Handmaker is currently litigating the following notable matters:

- *Parker, et al. v. America Traffic Solutions, et al.*: Ms. Handmaker is Lead Associate on the case team that is litigating claims against Florida municipalities and red light camera vendors alleging improper delegation power to enforce red light camera violations and improper collection of fines regarding same.
- *In re: Lumber Liquidators Chinese-Manufactured Flooring Products, Sales Practice and Product Liabilities Litigation:* Ms. Handmaker is Lead Associate on the case team litigating claims against Lumber Liquidators alleging fraudulent sale of composite flooring that contains excessive and unlawful levels of formaldehyde, a carcinogen.
- *Ubaldi v. SLM Corporation:* Ms. Handmaker is Lead Associate on case team litigating claims against Sallie Mae Inc. alleging usurious loan practices.

Some of her past successes include:

- Symantec Corp. Litigation: Ms. Handmaker was Lead Associate on the case team that succeeded in gaining final approval of a $60 million settlement. The case against Symantec and Digital River alleged misrepresentations regarding the companies' Extended Download Service. Ms. Handmaker was heavily engaged in the trial preparation for the lawsuit, which settled on the eve of the trial.
- Caterpillar Litigation: Ms. Handmaker was Lead Associate in a nationwide product liability class action against Caterpillar, Inc. alleging that engine exhaust system defects resulted in power losses and shutdowns that prevented or impeded their vehicles from transporting goods or passengers.

Ms. Handmaker attended the University of Southern California, graduating *summa cum laude* with a B.A. in Psychology and a B.A. in Political Science. Her undergraduate honors thesis was published in the American Psychological Association journal *Law and Human Behavior* under the title "'How Did You Feel?': Increasing Child Sexual Abuse Witnesses' Production of Evaluative Information."

Ms. Handmaker received her J.D. from the University of Virginia School of Law. While in law school, Ms. Handmaker served as an intern at the U.S. Department of Justice's Criminal Division focusing on cases involving child sexual abuse. She also served on the board of The Virginia Innocence Project, the University of Virginia's arm of the national litigation and public policy organization dedicated to exonerating wrongfully convicted people through DNA testing and reforming the criminal justice system. Ms. Handmaker also participated in the University of Virginia School of Law's Moot Court program and served on the Editorial Board of the *Journal of Law & Politics*.

Johanna M. Hickman

Johanna M. Hickman is an Associate at the firm, and is a member of the Public Client practice group. In this position, Ms. Hickman represents state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud and other fraudulent and deceptive trade practices. Previously, she assisted in litigation by a state attorney general regarding the robo-signing of mortgage foreclosure documents. In addition, she has worked on a number of confidential investigations.

Currently Ms. Hickman is representing public clients in the following high-profile matters:

- Nursing Homes: Representing attorneys general in investigations and litigation related to deceptive marketing by several nursing home chains that promised, but failed to provide, basic care to their

elderly residents. She is involved in all aspects of the investigations and litigation, including conducting and analyzing the results of investigations, developing legal theories, conducting fact and expert discovery and writing briefs.

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Ms. Hickman serves on the adjunct faculty of the Georgetown University Law Center, where she teaches a course in advanced legal writing and practice. Prior to joining Cohen Milstein in 2013, Ms. Hickman practiced at a leading defendants' firm, where she advised clients regarding environmental and toxic tort liability, negotiated the environmental aspects of corporate transactions, and represented clients in complex insurance coverage litigation. Prior to that, Ms. Hickman clerked for two years for the Honorable James I. Cohn of the United States District Court for the Southern District of Florida.

Ms. Hickman graduated with Highest Honors from the University of North Carolina at Chapel Hill with a B.A. in Journalism and Mass Communication. Ms. Hickman earned her J.D., *cum laude*, from the Georgetown University Law Center. She served as a Law Fellow, a Global Teaching Fellow, and a Staff Member and Symposium Editor of the *Georgetown Journal of Legal Ethics*. As a member of Georgetown's Barristers' Council, she was a finalist in Georgetown's 35th Annual Leahy Moot Court Competition, and her team won the Award for Best Brief Overall at the 2005 Pace National Environmental Law Moot Court Competition.

Anita F. Hill

Anita F. Hill is Of Counsel at Cohen Milstein, and a member of the Firm's Civil Rights & Employment Practice Group. In that role, she advises on class action workplace discrimination cases. Ms. Hill, who joined the Firm in 2011, has played a leading role in furthering equal opportunity and ending discrimination in the United States, and brings with her more than three decades of legal, governmental, policymaking and academic experience to the Civil Rights Practice. She is a noted speaker, thinker, commentator and author who has contributed to a broad range of important civil rights and social issues, including race, gender discrimination, media and the law. She has appeared on numerous television and news programs, and her writings and opinions regularly are published in leading newspapers and magazines in the United States and the world.

Ms. Hill began her career as an associate with a boutique defendants' firm based in Washington, D.C., which specialized in antitrust, federal agency and environmental work for corporate clients; in that role, she researched and wrote appellate and agency briefs on questions concerning environmental, corporate, antitrust and administrative law. She then served as special counsel to the assistant secretary of the Department of Education's Office for Civil Rights, where she advised on legal and policy matters related to individual and systemic claims of educational discrimination, reviewed legal and policy positions for government-wide enforcement efforts and wrote position papers on various civil rights education issues including race and gender discrimination claims and with a specific focus on issues facing historically black colleges and universities.

Later, Ms. Hill became adviser to the Chairman of the Equal Employment Opportunity Commission (EEOC), reviewing and analyzing Commission policy, writing legal policy and position papers for the Chairman and advising him on the effectiveness of the program and the functions of the Commission.

For more than three decades, Ms. Hill has taught law and public policy. She began her teaching career as an assistant professor at Oral Roberts University and later joined the faculty at the University of Oklahoma College of Law. In 1989, Ms. Hill became the first African American to be tenured at the University of Oklahoma, College of Law, where she taught contracts and commercial law. Since 1999, Ms. Hill has been on

the faculty of Brandeis University where she holds the title of University Professor, the highest academic rank awarded by Brandeis. Hill is one of only seven University Professors in the school's history. She teaches in the areas of civil rights, legal history and race and gender law and policy.

Ms. Hill is the author of numerous academic articles on international commercial law, contracts, bankruptcy and civil rights—all areas in which she has taught. She has given presentations on commercial law as well as race and gender equality to hundreds of business, professional, academic and civic organizations in the United States and abroad. In addition, she has appeared on several television programs, such as *Face the Nation* and *Meet the Press*, and has written for leading newspapers and magazines including *Newsweek*, *The New York Times* and *Boston Globe and Time.com*. Ms. Hill is the author of *Speaking Truth to Power* and served as the co-editor of *Race, Gender, and Power in America: The Legacy of the Hill-Thomas Hearings*. Her latest book is*Reimagining Equality: Stories of Gender, Race and Finding Home* (Beacon Press, 2011), an analysis of the housing market collapse of 2008 and its impact on gender and racial equality.

She is the recipient of numerous awards, grants and honorary degrees. Hill's professional and civic contributions include chairing the Human Rights Law Committee of the International Bar Association, and membership on the Board of Governors of the Tufts Medical Center and the Board of Directors of the National Women's Law Center and the Boston Area Lawyers Committee for Civil Rights. Ms. Hill was the subject of the documentary, *Anita: Speaking Truth to Power*, which premiered at the Sundance Film festival in January 2013. Ms. Hill attended Oklahoma State University, where she majored in Psychology, and earned her J.D. at Yale University Law School.

Julia Horwitz

Julia Horwitz is an Associate at Cohen Milstein and a member of the Firm's Employee Benefits Practice Group. In her role, Ms. Horwitz represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases across the country.

Prior to joining Cohen Milstein, Ms. Horwitz served as a law clerk for the Honorable Mary Ellen Coster Williams at the United States Court of Federal Claims. She worked at the Electronic Privacy Information Center in DC from 2012-2015, first as an Open Government Coordinator and Counsel, and then as the Director of the Consumer Privacy Project. Ms. Horwitz also was an Adjunct Professor at Georgetown Law School for a semester in 2013.

Ms. Horwitz attended Brown University, graduating with a B.A. in English, magna cum laude, in 2008. She earned her J.D. from the University of Chicago Law School in 2012. During law school, Ms. Horwitz was a staff member on the Edwin F. Mandel Legal Aid Clinic Employment Discrimination Project.

Anna Jagelewski

Anna Jagelewski is an Associate at Cohen Milstein and a member of the Public Client practice group. Ms. Jagelewski's practice focuses on the representation of state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud as well as other fraudulent and deceptive trade practices.

Prior to joining Cohen Milstein, Ms. Jagelewski was a law clerk for the Honorable Andre M. Davis of the U.S. Court of Appeals for the Fourth Circuit. She also clerked for the Honorable Reggie B. Walton of the U.S. District Court for the District of Columbia and the Honorable Florence Y. Pan of the Superior Court of the District of Columbia. Ms. Jagelewski also served as the Francis D. Murnaghan Appellate Advocacy Fellow at the Public Justice Center.

Ms. Jagelewski graduated, magna cum laude, from Ohio University with a B.A. in English in 2004. She earned her J.D., summa cum laude, Order of the Coif, from American University's Washington College of Law in 2011. During law school, Ms. Jagelewski served as the Associate Articles Editor for the American University Law Review and was the Founder and Chair of the American University Law Review Diversity Committee.

Ms. Jagelewski is not admitted in the District of Columbia; her practice is under the supervision of partners of the firm.

Nicholas Johnson

Nicholas C. Johnson is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death practice area. In that role, Mr. Johnson's practice focuses on medical malpractice, nursing home abuse, and personal injury cases.

Prior to joining Cohen Milstein in 2014, Mr. Johnson worked for two South Florida defense firms, gaining valuable experience representing Fortune 500 insurance companies in the defense of claims and lawsuits. Earlier in his career, Mr. Johnson practiced as an Assistant Public Defender in Palm Beach County, where he represented indigent clients charged with misdemeanors and felonies, ranging from DUI to crimes punishable by life in prison. He was awarded the Best Advocate Award at the Florida Public Defender College in November 2008. Mr. Johnson tried approximately 30 jury trials to verdict as an Assistant Public Defender. Eager to resume his representation of individuals, Mr. Johnson joined Cohen Milstein in 2014.

Mr. Johnson has litigated the following notable matters:

- *Pavlov v. PBSO:* Mr. Johnson was a member of a team of attorneys representing the mother of a 28-year-old mentally disturbed man who was shot and killed by a Deputy Sheriff of the Palm Beach County Sheriff's Office. Mr. Johnson was instrumental in litigating this case, which resulted in the largest settlement paid out by the Palm Beach County Sheriff's Office.
- *McCool v. Woodstream and Home Depot:* Mr. Johnson represents the family of Mary Jo McCool, a 46-year-old woman who was found drowned in her pool as a result of becoming overcome by the fumes from a propane mosquito trap. The matter currently is being litigated in Federal Court.
- Nursing Home Neglect Litigation: Mr. Johnson represented the spouse of an 85-year-old man who experienced a series of falls in a nursing home before finally fracturing his hip, which required hip replacement surgery. Mr. Johnson reached a confidential settlement in this case that alleged neglect on the part of the nursing home.

Mr. Johnson was selected to serve as a member of the 2015 class of The Florida Bar Leadership Academy, and was recently selected to the American Association for Justice's 2016 Leadership Academy. Mr. Johnson serves on the Board of Directors for the Palm Beach County Bar Association North County Section, and currently serves on the Board of the Florida Justice Association's Young Lawyer Section and the Membership Diversity

Committee, and is an active member of the Palm Beach County Bar and the Palm Beach County Justice Association. He is also actively involved in the American Association for Justice's Minority Caucus. He writes on various legal topics in such publications as the *Florida Justice Association Journal*.

Mr. Johnson graduated from Boston University with a B.A. in Economics, and completed his Master's in Sports Management at the University of Florida. He graduated *cum laude* from St. Thomas University School of Law in 2007. Mr. Johnson, who was born and raised in Kingston, Jamaica, has represented Jamaica at several international swimming competitions.

Eric Kafka

Eric A. Kafka is an Associate at Cohen Milstein, and a member of the firm's Consumer Protection practice group. Mr. Kafka's practice focuses on litigating class actions on behalf of consumers who have been deceived and harmed by large corporations.

Currently, Mr. Kafka is litigating the following notable matters:

- *In re Anthem, Inc. Data Breach Litigation:* Mr. Kafka represents consumers who were affected by the Anthem data breach. Plaintiffs allege that their confidential information, including their Social Security numbers, was compromised in the data breach.
- *Hankinson, et al. v. R.T.G. Furniture Corp., d/b/a Rooms to Go:* Mr. Kafka represents furniture consumers who allege that Rooms to Go misrepresented that it would professionally treat their furniture with stain-resistant chemicals.
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Prior to attending law school, Mr. Kafka worked on multiple poliltical campaigns, including President Obama's 2008 presidential campaign.

Mr. Kafka earned his J.D. from Columbia Law School, where he was a Harlan Fiske Stone Scholar. He received his B.A. from Yale University.

Adam Langino

Adam J. Langino is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practice groups. In his role, Mr. Langino represents clients who have been seriously or catastrophically injured, those who have suffered from managed care abuses and people who have been injured as a result of faulty products—and holding those responsible accountable for those injuries. Mr. Langino is an experienced, hands-on attorney, who has tried more than 20 jury trial cases in his career. Presently, he is litigating a number of product safety cases involving child booster seats.

Prior to joining Cohen Milstein in 2014, Mr. Langino was an Associate at Leopold Law and also served for three years as an Assistant Public Defender in West Palm Beach, FL. As an Assistant Public Defender, Mr. Langino handled complex felony criminal cases, including first-degree felonies and crimes punishable by life in prison. He gained valuable trial experience and secured freedom for the wrongly accused. Before his service as an Assistant Public Defender, Mr. Langino clerked for the Federal Public Defender in Minneapolis.

Currently, Mr. Langino is litigating the following notable matters:

- *Back-Cruz v. Evenflo, Inc.:* Mr. Langino represents the family of a child plaintiff in a product liability case. The lawsuit alleges that the poorly designed Evenflo booster car seat that the child was in failed to keep her safe in a car crash, resulting in catastrophic injuries. Mr. Langino is the primary attorney on the case and is managing all aspects of the litigation.

Some of his past successes include:

- *Mincey v. Takata:* Cohen Milstein was lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her paralyzed from the neck down in 2014 when the driver's side airbag deployed too aggressively during a vehicle collision. Patricia Mincey passed away in early 2016 due to complications from the quadriplegia caused by the problematic airbag. The suit charged that the Takata Corporation, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by the firm showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016. Mr. Langino had been involved in all aspects of the litigation, including discovery, taking depositions and directing motions.
- *Fuse v. Palm Tran:* Mr. Langino represented the family of a 5-year-old disabled child in a catastrophic injury case alleging that the disabled child suffered permanent brain damage during transport on the Palm Tran Connection service, a transportation service for elderly and disabled patrons, when the vehicle's driver ignored her calls for help, failed to provide first aid, and delayed access to emergency medical aid. The case was resolved in a settlement in excess of $1 million.
- *Hauser v. Rice Insulation:* Mr. Langino represented the Hauser family in a product liability lawsuit alleging that Rice Insulation, an insulation contractor, installed foam insulation incorrectly in the plaintiff's house, resulting in the house burning to the ground. The lawsuit included the contractor as well as the manufacturer for not providing sufficient warnings that the product might ignite under certain conditions. The matter was resolved confidentially. Mr. Langino managed all aspects of the litigation.
- *Palmer v. Baylines Inc.:* Mr. Langino represented the Palmer family in catastrophic injury and product safety lawsuit in which a truck driver fell asleep at the wheel and crashed into a vehicle carrying the Palmers, resulting in the death of Mrs. Palmer. Mr. Langino brought a catastrophic injury case against the trucking company Baylines Inc., and a product safety case against the carmaker of the vehicle that the Palmers were driving alleging that the airbags did not deploy properly, leading to Mrs. Palmer's death. The case was resolved in a confidential settlement. Mr. Langino managed all aspects of the litigation, including expert witnesses.

Mr. Langino was selected to the 2015 class of the American Association for Justice Leadership Academy, which is comprised of a select group of plaintiff trial lawyers chosen from across the country for national leadership training. The National Trial Lawyers has named Mr. Langino one of the Top 100 Trial Lawyers, Florida, for three years running, beginning in 2013. He is also an active member in the Palm Beach County Bar Association, the Board of the Florida Justice Association Young Lawyer Section, and the AAJ Membership Oversight Committee.

Mr. Langino attended the University of Maryland, graduating *magna cum laude* with Honors in Government and Politics, and earned his J.D., *cum laude*, from the University of Minnesota School of Law, where he received an award for Best Oral Argument and participated in the Wagner Labor Law Moot Court program.

A former amateur boxer, Adam volunteers as boxing coach for local youths for the Police Athletic League located in Palm Beach Gardens. He is the Past-President of Club 100 Charities and a board member of Cops Helping Kids, charities that are dedicated to improving Palm Beach County by focusing on the needs of the youth and elderly.

Joel P. Laitman

Joel P. Laitman is Of Counsel at Cohen Milstein and a member of the Securities Litigation & Investor Protection Practice Group. Mr. Laitman has served as lead counsel in five of the firm's major mortgage-backed securities class actions brought on behalf of pension funds and other institutional investors against major investment banks. These cases alleged that the underlying mortgages failed to comply with the underwriting standards described in the Offering Documents.

Besides initiating these cases and directing and leading discovery with his partner Chris Lometti, Mr. Laitman argued all motions and conducted all hearings both before the District Court and the Second Circuit. In just three of these cases that have settled to date, recoveries totaling $720 million were achieved for the benefit of injured investors: $335 million in the RALI MBS case brought against Goldman Sachs, UBS and Citigroup; $275 million in the Harborview MBS case brought against RBS; and $110 million in the HEMT MBS case brought against Credit Suisse.

The settlements achieved in these cases have been commended by Courts and by legal publications. Commenting on the Harborview litigation, Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, noted that the case brought on behalf of the plaintiffs was "interesting and different" and that settlement on their behalf "was a job well done." Judge Fallia, in approving the RALI Settlement, commended the firm for prosecuting the case for seven years and "never giving up" despite substantial obstacles.

The litigations and settlements have garnered awards from the leading legal publications. In 2014 and 2015, the National Law Journal cited the Harborview and RALI MBS in designating the firm an Elite Trial Law Firm and placing the firm on the Hot List; Law360 cited the RALI and Harborview cases in designating the firm one of "The Most Feared Plaintiffs Firms" in 2015, the third year in a row that Cohen Milstein received the designation; and in 2015, Law360 selected Cohen Milstein as the sole plaintiff firm to be chosen in two "Practice Groups of the Year" categories and one of only five class action law firms to be recognized, singling out the RALI and Harborview cases in the award.

In addition, Mr. Laitman has argued a number of seminal cases before the Second Circuit in the securities field including: Teamsters Local 445 Freight Div. Pension Fund v. Dynex Capital, Inc., 531 F.3d 190 (2d Cir. 2008) (addressing corporate scienter under Section 10 (b)); Teamsters Local 445 Freight Div. Pension Fund v. Bombardier, Inc., 546 F.3d 196 (2d Cir. 2008) (addressing standard for establishing market efficiency in certification of Section 10(b) claims); N.J. Carpenters Health Fund v. Royal Bank of Scotland Group, PLC, 709 F.3d 109 (2d Cir. 2013) ("NovaStar") (reversing dismissal of Securities Act claims); Wyo. State Treasurer v. Moody's Investors Serv. (In re Lehman Bros. Mortgage-Backed Sec. Litig.) ("Lehman"), 650 F.3d 167 (2d Cir. 2011) (addressing rating agency liability under the Securities Act); and N.J. Carpenters Health Fund v. RALI Series 2006-QO1, 477 Fed. Appx. 809 (2d Cir. 2012) ("Harborview/RALI", addressing class member knowledge as grounds for denial of class certification).

A member of Phi Beta Kappa, Mr. Laitman is a graduate of Columbia University, with a B.A., magna cum laude, and earned his law degree at Georgetown University Law Center.

Stephan A. LeClainche

Stephan A. LeClainche is Of Counsel at Cohen Milstein, and head of the firm's Medical Malpractice group. In his role, Mr. LeClainche represents victims and the families of victims of all types of medical negligence. His practice specializes in medical malpractice, but also includes medical device litigation, automobile negligence, sexual abuse and other serious injury and wrongful death cases.

Mr. LeClainche is an experienced trial attorney, whose recent admission to the prestigious American College of Trial Lawyers attests to his reputation among peers as an outstanding trial lawyer. He understands, however, that legal skill in a courtroom is only a part of the qualifications that a good attorney brings to the practice in representing the victims of negligence. Equally important is the empathy an attorney must possess in counseling and guiding these victims and their families. The best attorneys are advisers and advocates, compassionate yet aggressive—a partner to clients, making them part of the team. These are traits that Mr. LeClainche brings to each of his cases.

Prior to joining Cohen Milstein in 2015, Mr. LeClainche was a name partner in a boutique trial law firm based in West Palm Beach. A Florida Board-Certified Civil Trial Lawyer since 1996 with more than three decades of experience litigating civil lawsuits, Mr. LeClainche is both a veteran attorney and a seasoned investigator, investing the time necessary to unearth and analyze every potentially relevant facet of a case. Many of his cases represent the cutting edge of both medicine and law, and grow out of the evolution of medicine and its practice. The cases may be different, but the complexities, challenges and stakes are always high, requiring attention to detail – and dedication to a client's needs and concerns.

Some of Mr. LeClainche's litigation and trial successes include the following notable matters:

- A confidential settlement reached in a medical malpractice case against an interventional cardiologist regarding his controversial practice of using a stent in the mid-popliteal artery to treat arterial occlusion. The case involved the off-label use of a medical device and a surgeon acting outside the scope of his practice.
- A $40 million verdict recovered for a child in a wrongful death case.
- A $5 million settlement reached during trial in a medical malpractice case.
- Verdicts of $1.7 million and $10 million in two separate cases involving sexual abuse of minors.
- A $2.3 million verdict for personal injuries suffered during a fall at an amusement park.
- A $2.8 million verdict for a death and personal injuries suffered by husband and wife in a motor vehicle accident.
- Co-lead of the trial team of lawyers who, after years of costly litigation, successfully recovered $27 million on behalf of 10 victims of child abuse in a case brought in Federal Court in New York.

Mr. LeClainche currently represents clients in a diverse variety of medical malpractice cases, including:

- Several lawsuits involving injuries arising from laparoscopic and open gall bladder surgery.
- A case involving a military reservist suffering from deep vein thrombosis (a clot in the veins of the leg), who was misdiagnosed and as a result suffered a pulmonary embolus and died just as he was being discharged from the hospital.
- A routine colonoscopy that resulted in a perforated colon and the subsequent death of the client.

- Misdiagnosis on colonoscopy resulting in the client being given a clean bill of health only to be subsequently diagnosed with Stage 4 colon cancer.

In addition to his recent admission to the American College of Trial Lawyers, Mr. LeClainche's accomplishments over the years have enabled him to achieve an AV-Preeminent rating from Martindale-Hubbell, the highest rating available for ethics and legal ability from the nation's oldest guide to lawyers and law firms.

Mr. LeClainche attended Florida International University, graduating *magna cum laude* with a B.A. in Political Science, and earned his J.D. from the University of Florida College of Law. Mr. LeClainche was born and raised in Kingston, Jamaica.

Scott Lempert

Scott M. Lempert is Of Counsel at Cohen Milstein and a member of the firm's Employee Benefits (ERISA) Practice Group. He joined the firm in 2016 and represents the interests of employees, retirees, and plan participants and beneficiaries in ERISA cases in the district court and on appeal.

Mr. Lempert is currently engaged in litigating a number of so-called "church plan" lawsuits. These cutting-edge legal cases assert that many non-profit health care systems in the United States wrongfully claim their benefit plans are exempt from ERISA regulation under the church plan exemption. Currently, Cohen Milstein serves as lead or co-lead counsel in 12 separate cases in various jurisdictions throughout the U.S.

Mr. Lempert has over 20 years of experience litigating complex commercial class actions on behalf of employees, retirees and consumers in retiree benefits, employment, consumer protection and antitrust matters. Prior to joining Cohen Milstein he worked on many high-profile matters, including:

- *In re: Unisys Corp. Retiree Medical Benefits ERISA Litig.* – a series of cases involving representation of thousands of retirees, both as class actions and individually, seeking restoration of lifetime retiree medical benefits unlawfully terminated after retirement. These cases successfully achieved multiple settlements and court judgments providing lifetime retiree medical benefits for some and a continuing stream of payments to pay for medical benefits for other retirees.
- *Raetsch v. Lucent Technologies* – 36 million dollar settlement involving unlawful transfer of excess defined benefit pension funds to an account to pay for retiree medical benefits.
- *Mehling v. New York Life Insurance Co*. -- 14 million dollar settlement challenging excessive fees charged to New York Life employees and the company's pension plan for Plan assets invested in New York Life owned mutual funds.
- *Stagi v. National R.R. Passenger Corp*. – Gender discrimination class action alleging unlawful disparate impact on female union employees resulting from enforcement of an Amtrak employee policy that blocked union employees from promotion to management. Settlement provided Amtrak employees compensation for denial of opportunities for promotion and the striking of the unlawful employment policy.

Mr. Lempert graduated Phi Beta Kappa from the University of Delaware with a B.A., magna cum laude, in Psychology, and received his J.D., from the University of Pennsylvania Law School. During law school, he served as Vice President of the Law School Government and was a Morris Fellow.

Christopher Lometti

Christopher Lometti is Of Counsel in the Securities Litigation & Investor Protection Practice Group, having joined Cohen Milstein in 2009. In this role, Mr. Lometti has litigated some of the most significant mortgage-backed securities (MBS) class action lawsuits to emerge from the financial crisis.

Mr. Lometti, together with Joel Laitman, his fellow Partner in the Securities Litigation Practice, initiated the Bear Stearns, Harborview, RALI, Lehman and HEMT MBS litigation at their named firm prior to joining Cohen Milstein. The lawsuits were high-risk matters involving novel claims on behalf of their Taft-Hartley pension fund clients injured by the dramatic downgrades of their MBS holdings from AAA to junk status. The MBS litigations have earned Cohen Milstein's Securities Litigation Practice numerous accolades from the *National Law Journal, Law360* and *American Lawyer.*

Mr. Lometti's successes include the following notable matters:

- Bear Stearns MBS Litigation: $500 million settlement with JPMorgan Chase. Cohen Milstein was lead counsel in a class action lawsuit alleging Bear Stearns violated securities laws in selling toxic mortgage-backed securities that failed to meet the bank's own underwriting standards and that contained false and misleading information as to the appraised values of the underlying mortgages. Mr. Lometti was one of the key litigators in the case, developing strategy and conducting extensive fact discovery into the 22 offerings backed by approximately 71,000 largely Alt-A mortgages that Bear Stearns sold to investors from May 2006 to April 2007.

- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action litigation alleging RALI and its affiliates sold shoddy MBS securities that did not meet the standards of their underwriters. Mr. Lometti was one of the senior litigators on the class action, conducting fact discovery, deposing economic experts and preparing witnesses.

- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team of which Mr. Lometti was a senior litigator.

- HEMT MBS Litigation: $110 million settlement with Credit Suisse. Cohen Milstein was lead counsel in a case alleging Credit Suisse and its affiliates sold toxic securities to pension fund investors. The suit, filed in 2008, was one of the first class action cases involving mortgage-backed securities to be filed.

- Lehman Litigation: $40 million settlement. Cohen Milstein was lead counsel in a class action lawsuit against individuals affiliated with the bankrupt firm, the largest bankruptcy in U.S. history. Mr. Lometti was a senior litigator on the lawsuit, developing strategy.

- Dynex Litigation: $7.5 million settlement. Cohen Milstein was lead counsel in class action lawsuit involving the asset-backed securities. Mr. Lometti was a central member of the team to litigate this seminal lawsuit involving hybrid securities. In the litigation, the U.S. District judge issued one of the first decisions certifying an investor class pursuing fraud claims in connection with the sale of asset-backed securities. The Dynex litigation laid out a road map that could be followed in litigating an asset-backed security.

Currently, Mr. Lometti is litigating the following matters:

- NovaStar MBS: Cohen Milstein is lead counsel in litigation alleging that RBS, Wells Fargo (formerly Wachovia) and Deutsche Bank sold toxic mortgage-backed securities in investors. The litigation is one of the last outstanding class action MBS lawsuits. The Second Circuit Court of Appeals reversed an earlier dismissal of the lawsuit, paving the way for prosecution of the case.

- Volaris Litigation: Cohen Milstein is lead counsel in a class action lawsuit alleging that the Mexican airline Volaris Aviation Holding Co. withheld financial information regarding revenue recognition from investors before the company's $235 million initial public offering. Soon after the IPO, the news came to light and the stock fell roughly 15%. The case is ongoing.

- Braskem Litigation: Cohen Milstein represents shareholders in a class action suit alleging that the Brazilian petrochemical company lied to investors in its American Depository Receipts about its role in a bribery scheme involving Petrobras, Brazil's giant oil producer. The case is ongoing.

Mr. Lometti received a Bachelor of Arts from Fordham College in 1983, and his J.D. from Fordham Law School in 1986.

Prior to his arrival at Cohen Milstein, Mr. Lometti played a substantive role in litigating and settling the massive class action suit against WorldCom, one of the largest bankruptcies in history, representing significant stakeholders in the telecom's bond offerings. The lawsuit resulted in a settlement of $6.15 billion.

He has served as a non-industry arbitrator for the New York Stock Exchange and National Association of Securities Dealers helping to resolve disputes, and as a mediator for the New York State Court System.

Diana L. Martin

Diana L. Martin is Of Counsel at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Consumer Protection, Managed Care Abuse, and Unsafe & Defective Products practice groups. She concentrates her practice on appellate litigation involving complex product liability, consumer class, mass tort and managed care litigation by not only handling appeals for the firm in these areas, but also by providing appellate support at the trial stage. In that role, she drafts and argues complex and case dispositive motions, handles jury instruction charge conferences and assists trial counsel in preserving and protecting the record in the event of an appeal.

Of notable interest is Ms. Martin's success in achieving justice for injured workers who have been wrongfully denied medical care and treatment by their employer or their employer's workers' compensation carrier, resulting in the employee suffering injuries in addition to those suffered in the workplace accident. While many attorneys refuse to litigate such cases given the difficulty of navigating around the legal immunity afforded to defendants by Florida law, Ms. Martin has gotten many of these cases past the motion to dismiss and summary judgment stages, resulting in settlement of the workers' claims prior to trial.

Currently, Ms. Martin is helping the firm litigate the following matters:

- *United States of America, et al. v. AIDS Healthcare Foundation, Inc.*: Cohen Milstein represents three former managers of the AHF in a Federal and Florida State Whistleblower Act claims against the

nation's largest provider of HIV/AIDS medical care for illegal patient referral kickbacks. Ms. Martin has been involved in all aspects of the litigation. The case is ongoing.

- HCA: Cohen Milstein is lead counsel in a class action lawsuit alleging that four Florida plaintiffs and others like them were billed inflated and exorbitant fees for emergency radiology services, in excess of the amount allowed by law, covered in part by their mandatory Florida Personal Injury Protection insurance. When the district court struck plaintiffs' class claims, Ms. Martin successfully petitioned the Eleventh Circuit Court of Appeals to accept immediate appellate review.
- Wal-Mart Employment Discrimination Litigation: Ms. Martin assisted the firm's Civil Rights and Employment practice group in a regional gender bias case in the Southern District of Florida alleging that Wal-Mart discriminates against women in pay and promotion decisions. After settlement agreements were reached on behalf of the individual plaintiffs, Ms. Martin has taken the lead role in appealing to the Eleventh Circuit Court of Appeals the district court's order dismissing as time-barred the plaintiffs' class claims, which originated from the seminal case of*Dukes v. Wal-Mart*.
- *Adams v. Palm Beach County Sheriff's Office:* Cohen Milstein is lead counsel in an excessive force and wrongful death action against the Palm Beach County Sheriff's Office and one of its detectives, who shot and killed the unarmed Seth Adams while he was on family property. Having provided legal support throughout the district court proceedings, Ms. Martin is currently handling the appellate proceedings in which the officer has appealed to the Eleventh Circuit Court of Appeals the district court's denial of his motion for summary judgment based on qualified immunity.

Some of her past successes include:

- *Mincey v. Takata:* Cohen Milstein was is lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic in 2014 when the driver's side airbag in her Honda Civic deployed too aggressively during a collision due to a product defect. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia. The suit charged that Takata, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. When the defendants removed Ms. Mincey's case to federal court in an attempt to have it bogged down in multi-district litigation, Ms. Martin successfully had the case remanded to Florida state court, where it is was resolved in July 2016.

Prior to joining the firm in 2014, Ms. Martin served as appellate counsel to Leopold Law, P.A., in Palm Beach Gardens, FL. Before that, she clerked for three years for the Honorable Martha C. Warner in Florida's Fourth District Court of Appeal. Ms. Martin attended Flagler College, graduating *summa cum laude* and being awarded Departmental Honors in Philosophy/Religion. She earned her J.D. from the University of Florida Levin College of Law, graduating with High Honors and achieving admission to the Order of the Coif.

Ms. Martin currently serves as President of Florida Legal Services, serves as Audit Committee Chair of Families First of Palm Beach County, and sits on the board of the Florida Bar Foundation. She has written numerous legal articles, which have been published in a variety of journals, including *Trial Magazine*, *The Florida Bar Journal*, and the *Florida Justice Association Journal*. Ms. Martin also co-authors *Florida Insurance Law and Practice*, an annual publication by Thomson/West.

Douglas J. McNamara

Douglas J. McNamara is Of Counsel at Cohen Milstein, and a member of the firm's Consumer Protection practice group. In that role, Mr. McNamara specializes in litigating complex, multi-state class action lawsuits against manufacturers and consumer service providers such as banks, insurers, credit card companies and others. He has helped litigate precedent-setting cases, including *Salud Services, Inc. v. Caterpillar, Inc.* He is a hands-on litigator who takes pleasure in the details, facts, and documents of each case. Mr. McNamara is a highly regarded speaker who has presented at several forums on such topics as federal preemption, class certification and civil litigation, and is the author of scholarly articles focusing on emerging legal issues.
Mr. McNamara has worked on numerous cases involving dangerous pharmaceuticals and medical devices, light cigarettes, defective consumer products, and environmental torts. He litigated and resolved the class action lawsuit against Philips Electronics North America Corp., which alleged that certain Philips and Magnavox flat-panel TVs suffer from a defect that causes their capacitors to fail prematurely and renders the TVs inoperable.

Mr. McNamara is currently litigating the following notable matters:

- Lumber Liquidators Litigation: Cohen Milstein is co-lead counsel in the consumer class action lawsuit *In re: Lumber Liquidators Chinese-Manufactured Flooring Products, Sales Practice and Product Liabilities Litigation*, alleging the nationwide retailer sold Chinese-made laminate flooring containing hazardous levels of the carcinogen formaldehyde while falsely labeling their products as meeting or exceeding California emissions standards, a story that was profiled twice on 60 Minutes in 2015.
- Symantec Litigation: Cohen Milstein is lead counsel in *Khoday et al. v. Symantec Corp. et al.,* a nationwide class action battle involving the marketing to consumers of a re-download service in conjunction with the sale of Norton software. The case settled in a $60 million all-cash deal a month before the case was to go to trial – one of the most significant consumer settlements in years. Mr. McNamara was involved in all aspects of the case, from managing the litigation to overseeing a staff of contract attorneys to settlement discussions.
- Rooms to Go Litigation: Cohen Milstein represents a putative class in *Hankinson et al. v. R.T.G. Furniture Corp., d/b/a Rooms to Go,* alleging that the furniture retailer misled consumers as to the application of its ForceField stain protection plan. Mr. McNamara is engaged in all aspects of the litigation, including discovery and working with expert witnesses.
- Caterpillar Litigation: Cohen Milstein is lead counsel in *Salud Services, Inc. v. Caterpillar, Inc.*, a class action lawsuit against Caterpillar alleging that bus engines designed to meet 2002 federal emissions standards are failing, leaving passengers stranded and bus companies eating the costs of countless repairs and towing fees. The Firm succeeded in beating back the defendant's argument that the Clean Air Act preempted the plaintiff's claims since the claims related to emissions standards. Mr. McNamara was the architect of that opposition and is involved in all aspects of the product liability litigation.

Prior to joining Cohen Milstein in 2001, Mr. McNamara was a litigation associate at an international law firm, specializing in pharmaceutical and product liability cases. He started his career at New York City's Legal Aid Society, defending indigent criminal defendants at trial and on appeal.

He has been the lead author on three law review articles: "Buckley, Imbler and Stare Decisis: The Present Predicament of Prosecutorial Immunity and An End to Its Absolute Means,: 59 *Albany Law Review*, 1135 (1996); "Sexual Discrimination and Sexual Misconduct: Applying New York's Gender-Specific Sexual

Misconduct Law to Minors," 14 *Touro Law Review*, 477 (Winter 1998), and most recently, Douglas McNamara, et al, "Reexamining the Seventh Amendment Argument Against Issue Certification," 34 *Pace Law Review*, 1041 (2014). He is presently teaching a course on environmental and toxic torts as an adjunct at George Washington University School of Law.

Mr. McNamara graduated *summa cum laude* from SUNY Albany with a major in Political Science, and earned his J.D. from New York University School of Law.

Miriam Nemeth

Miriam R. Nemeth is an Associate in Cohen Milstein's Civil Rights & Employment practice group. Ms. Nemeth's practice focuses on civil rights, employment discrimination, and wage and hour cases. In addition, she has experience litigating cases involving police misconduct, government abuse of power, and prisoners' rights.
Prior to joining Cohen Milstein in 2015, Ms. Nemeth practiced at a civil rights litigation boutique in Detroit. Among the cases she litigated there was a race discrimination lawsuit against a police department on behalf of five African-American men who were the victims of gang violence, as well as a racial profiling claim on behalf of a woman who was removed from an airplane based on her race. She also represented a jail inmate who suffered lasting damages from a corrections officer's assault, and a family who received false information about the death of their son during his employment with a private security contractor.

Following law school, Ms. Nemeth served as a law clerk for the Honorable Ronald Lee Gilman on the Sixth Circuit Court of Appeals and the Honorable David M. Lawson on the Eastern District of Michigan.

Currently, Ms. Nemeth is involved in the following notable matters:

- McDonald's Litigation: Cohen Milstein represents McDonald's crew members in several wage and hour lawsuits asserting that McDonald's regularly fails to pay workers for all the hours they work by denying them legally mandated meal and rest breaks, payments for missed breaks, and assistance with uniform maintenance, amongst other claims.
- Temporary Employment Staffing Agency Litigation: Cohen Milstein represents African American workers in a series of class actions against employment staffing agencies in Chicago. The suits allege a pattern of race discrimination against African American laborers in the staffing and assignment of workers by temporary staffing agencies to their client companies.
- Transgender Health Care Coverage Cases: Cohen Milstein represents LGBT individuals in their claims of sex discrimination in the denial of access to health care coverage for transition-related care.
- Pro Bono: Ms. Nemeth has a strong commitment to pro bono work and currently represents a Washington, D.C., resident in her application for disability benefits for a debilitating genetic condition.

Ms. Nemeth is a graduate *cum laude* of the University of Pennsylvania Law School. There, she served as a Comments Editor on the *University of Pennsylvania Law Review* and co-directed the Prisoners' Legal Education Project, a student-run clinic that worked with inmates. She also received the 2009 Benjamin R. Jones Memorial Award for Contributions to the Public Interest. During law school, Ms. Nemeth interned with the Capital Habeas Unit of the Federal Community Defender Office in the Eastern District of Pennsylvania, the Bazelon Center for Mental Health Law and the D.C. Public Defender Service's Mental Health Division. Before

attending law school, Ms. Nemeth graduated *summa cum laude* from the George Washington University's Honors Program with a double-major in English and Psychology.

Ms. Nemeth is an active member of the American Constitution Society and has been named a Next Generation Leader and a Public Interest Fellow by that organization.

Casey M. Preston

Casey M. Preston is a member of Cohen Milstein's Whistleblower/False Claims Act Practice Group. Mr. Preston represents whistleblowers nationwide in qui tam litigation, involving numerous industries, such as health care, defense, financial services, and government procurement. He also represents individuals who report tax fraud, securities fraud, and customs fraud through federal whistleblower programs. In addition, Mr. Preston has significant experience handling complex commercial cases and securities litigation in courts across the U.S. Some of Mr. Preston's current representations include:

- A sealed qui tam action related to a drug manufacturer's alleged use of illegal marketing practices to increase usage of its drug by Medicare beneficiaries.
- A sealed qui tam action against importers alleged to have engaged in tariff fraud.
- A sealed qui tam action involving claims that hospitals overcharged the government health care programs by misclassifying outpatient services as inpatient services.
- A sealed qui tam action against a chain of medical practices that allegedly performed unnecessary tests on patients covered by the government health care programs and billed the government for services that were not performed.
- A sealed qui tam action alleging that a medical equipment supplier is selling unnecessary equipment and supplies to Medicare beneficiaries.
- A sealed qui tam action involving claims that a provider of mental health rehabilitative services up-coded services provided to Medicaid beneficiaries.

Mr. Preston has played a key role in a number of successful cases, including:

- A qui tam action alleging that drug manufacturer Wyeth overcharged the state Medicaid programs by not providing them the statutorily required "best price" for a widely prescribed drug. This action resulted in a recovery of more than $780 million by the government.
- A qui tam action against a chain of urgent care centers that allegedly billed the government for unnecessary testing performed on beneficiaries of the government health care programs. There was a $10 million recovery by the government.
- A sealed qui tam action against a dental group for performing unnecessary dental procedures on Medicaid beneficiaries.
- Represented the limited partner of several commercial real estate partnerships in a fraud and breach of fiduciary duty action against the partnerships' general partner.
- Represented stock and bondholders in a class action against a food distributor and its outside accounting firm that resulted in a $90+ million recovery for the investors.
- Represented stockholders in a securities class action against a software company that resulted in a $5+ million recovery for the investors.
- Represented a hedge fund in a securities fraud action against a marketing company through which the hedge fund secured a $4 million recovery.

- Represented a state pension fund in a securities class action against an insurance company that resulted in a $90+ million recovery for stockholders.

In addition, Mr. Preston has provided pro bono services to the Legal Clinic for the Disabled and the Brady Center to Prevent Gun Violence.

Mr. Preston served as law clerk for the Hon. William J. Nealon, U.S. District Court for the Middle District of Pennsylvania and the Hon. Terrence R. Nealon, Court of Common Pleas, Lackawanna County, Pennsylvania. Mr. Preston received his B.S. from The Citadel and his J.D. from the Villanova University School of Law.

Poorad Razavi

Poorad Razavi is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death and Unsafe & Defective Products practice areas. Mr. Razavi's practice focuses on products liability, vehicle defects, roadway design and maintenance defects, trucking and car accidents, negligent security, and multi-million dollar wrongful death and catastrophic injury suits.

Mr. Razavi began his practice as an insurance defense attorney working side-by-side with insurance adjusters, which provides his clients the benefit of an advocate with a unique perspective into the mindset of insurance companies and corporate defendants, and with a distinct understanding about how to maximize the value of a claim in order to ensure that his clients receive maximum compensation for their injuries.

Thereafter prior to joining Cohen Milstein, Mr. Razavi was a senior associate at another prestigious personal injury products liability firm. While there, Mr. Razavi represented clients across the nation, including in Florida, California, Indiana, Ohio, Georgia, New York, Nevada, Michigan, Alabama, and Tennessee. He has litigated claims against all of the major insurance carriers, as well as automobile, tire, and component part manufacturers, including General Motors, Honda, Chrysler, Takata, and Continental. Mr. Razavi has also handled a broad range of non-traditional personal injury and wrongful death cases throughout the country, including claims involving chemical and pesticide exposure, chlorine gas exposure, mold exposure, construction defect, boating defect, negligent vehicle repairs, and negligent tractor-trailer operation.

Mr. Razavi also has extensive experience in claims against the Department of Transportation and other private state contractors for roadway design and defect claims, and has litigated multiple roadway design and maintenance defect claims resulting in multi-million dollar settlements and subsequent installation and remediation of guardrails, re-paving, curbing, and rehabilitation of roadways in multiple counties.

Additionally, Mr. Razavi initiated the investigation and discovery of a major vehicle airbag defect resulting in the filing of a subsequent class action against the world's largest automobile manufacturers, in which he was selected to the class action discovery committee.

Mr. Razavi has been featured in multiple publications for his successful results in fighting against the automobile industry as well as for handling claims of defective roadway design both in Florida and throughout the country. He has proudly served the legal and local community, holding several prominent Bar Association leadership positions and continually being actively involved as a speaker and moderator on a variety of legal topics. He has repeatedly been selected as "Rising Star" by Florida Super Lawyers and a "Legal Elite Up and Comer" by Florida Trend Magazine.

Mr. Razavi graduated from Indiana University with a B.S. in International Business and Business Economics. He received his J.D. from the University of Cincinnati College of Law and was a Merit Scholarship recipient.

Kenneth M. Rehns

Kenneth M. Rehns is an Associate in the Securities Litigation & Investor Protection Practice Group, having joined Cohen Milstein in 2009. In this role, Mr. Rehns has been a key member of the team that initiated and litigated the most important mortgage-backed securities (MBS) class action lawsuits to emerge from the financial crisis.

Among his successes are the following litigations:

- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action lawsuit alleging that RALI and its associates sold toxic mortgage-backed securities that failed to meet their own underwriting standards. One of the earliest MBS cases to be brought in 2008, Mr. Rehns was involved with all aspects of the litigation from its inception.
- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team. Mr. Rehns was lead Associate in the case, responsible for fact discovery and for overseeing some 30 contract attorneys and support staff.
- HEMT MBS Litigation: $110 million settlement with Credit Suisse. Cohen Milstein was lead counsel in a case alleging Credit Suisse and its affiliates sold toxic securities to pension fund investors. Mr. Rehns, who was with the lawsuit from its inception, was deeply involved in briefing and discovery.
- IntraLinks Litigation: $14 million settlement. Cohen Milstein was co-lead in a class action lawsuit alleging that IntraLinks, a virtual data room provider, misrepresented the strength of its largest business segment, having lost its most important customer, the FDIC. Mr. Rehns was the lead Associate on the litigation, a case calling for multiple depositions, deep discovery and review of millions of pages of documents.

Currently, Mr. Rehns is litigating the following notable matters:

- Braskem: Cohen Milstein represents the company's American Depositary Receipts shareholders in a class action lawsuit alleging that Braskem, one of Brazil's biggest petrochemical providers, lied to shareholders about its role in the bribery scandal involving Petrobras, the country's oil producing giant. The case is ongoing.
- BioScrip Shareholder Derivative Litigation: Cohen Milstein is co-lead counsel seeking to hold the company's board and management accountable for a pharmaceutical drugs kickback scheme. Mr. Rehns is responsible for briefing and will be responsible for discovery as the litigation progresses. The case is ongoing.
- Broadcom Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit challenging the fairness of the proposed merger terms between Avago and Broadcom. Mr. Rehns is the sole Associate on the case. He has drafted the complaint and will be responsible for discovery and briefing going forward. The case is ongoing.

Mr. Rehns attended George Washington University, graduating cum laude with a B.B.A. in Business and Economics, and earned a J.D., cum laude, at Syracuse University College of Law, where he was an Editor of the Syracuse Journal of International Law and Commerce.

Raymond M. Sarola

Raymond M. Sarola is an Associate at Cohen Milstein, and a member of the Firm's Whistleblower/False Claims Act and the Ethics and Fiduciary Counseling practice groups. Mr. Sarola represents whistleblowers in cases brought under the federal and state false claims acts in a wide range of industries that conduct business with the government, including health care, defense and financial services. As a member of the Firm's Ethics and Fiduciary Counseling practice, Mr. Sarola calls on his experience as a trustee on the New York City pension fund boards in counseling public pension funds fiduciary issues.
Mr. Sarola's experience includes both government service and corporate litigation. Prior to joining the firm, he served as Senior Policy Advisor & Counsel in the Mayor's Office of the City of New York. While there, he represented the Mayor and Commissioner of Finance on the boards of the City's pension systems and deferred compensation plan and advised on legal issues regarding pension investments, benefit payments, securities litigation and corporate governance initiatives. Previously, Mr. Sarola was a litigation associate at a noted defendants' firm, where he represented companies and individuals in securities and other complex commercial litigation, internal investigations and antitrust matters.

Most recently, Mr. Sarola assisted in the qui tam action against the pharmaceutical company Wyeth pending in the District of Massachusetts, in which more states joined to intervene along with the government of the United States than have ever intervened in a qui tam action in history. (United States of America et al., ex rel. Lauren Kieff, v. Wyeth, No.1:03-CV-12366-DPW [D.Mass.].) The $784.6 million settlement was the seventh-largest False Claims Act recovery on record and the second-largest recovery involving a class of drugs in history.

Mr. Sarola has published articles on whistleblower issues, including the use of statistical sampling to prove large fraud cases. He has also published and spoken at conferences on pension fund fiduciary issues, in particular the SEC's pay-to-play rule. He is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the False Claims Act.

Mr. Sarola received his B.A. from the University of North Carolina at Chapel Hill, and earned his J.D. from the University of Pennsylvania Law School, where he also earned a Certificate of Study in Business and Public Policy from the Wharton School. While in law school, he was a Summer Intern for the Honorable Clarence Newcomer, United States District Court for the Eastern District of Pennsylvania.

Daniel Silverman

Daniel H. Silverman is an Associate and a member of the Antitrust Practice Group at Cohen Milstein, having joined the firm in 2012. Mr. Silverman has prosecuted class actions on behalf of both consumers and employees in a variety of industries in courts around the country. Among his successes, Mr. Silverman has helped litigate the following matters:

- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein was co-lead counsel for plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin—life-saving therapies derived from blood plasma. The lawsuit was resolved for $128 million to compensate customers who were overcharged for these vital therapies.
- Domestic Drywall Antitrust Litigation: Cohen Milstein is co-lead counsel in an antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices. To date, settlements for $45 million have been reached with two of the defendants.
- VFX/Animation Workers: In *In re Animation Workers Antitrust Litigation* (N.D. Cal.), Mr. Silverman serves as co-lead counsel representing a class of animation and visual effects workers in a lawsuit alleging that the defendants, who include Pixar, Lucasfilm Ltd. and DreamWorks Animation, secretly agreed not to solicit class members and to coordinate on compensation.

Prior to joining the firm, Mr. Silverman served as the Executive Director of Legal Economics, LLC, a Cambridge, Massachusetts-based firm specializing in the analysis of complex economic issues related to legal issues. At Legal Economics, he supported expert economic testimony in a variety of antitrust matters involving horizontal price-fixing, mergers, and loyalty discounts in industries ranging from health care and computer hardware to live music promotion. His experience at Legal Economics provides him with unique insight into the inner workings of expert testimony in antitrust matters. In addition, Mr. Silverman has represented public sector clients before the Federal Energy Regulatory Commission, state public utility commissions, and federal appellate courts.

Mr. Silverman is a magna cum laude graduate of Brown University, with a B.S. in Physics, where he was elected to Phi Beta Kappa. He earned a J.D., magna cum laude, from Harvard Law School. In law school, he served as a Managing Editor of the Harvard Environmental Law Review. Mr. Silverman also served as a summer associate at the U.S. Department of Justice in the Environment and Natural Resources Division, Law and Policy Section.

Richard A. Speirs

Richard A. Speirs is Of Counsel at Cohen Milstein, having joined the firm's Securities Litigation & Investor Protection practice group in 2010. He worked on many of the mortgage-backed securities fraud cases that were successfully litigated by the firm. Currently, in addition to litigating securities fraud cases, Mr. Speirs is principally responsible for developing and litigating the firm's derivative and merger-related lawsuits.
Since joining the firm, Mr. Speirs has litigated the following notable matters:

- Bear Stearns Mortgage Pass-Through Certificates Litigation: $505 million settlement by JPMorgan Chase & Co. to settle a class action litigation arising from Bear Stearns' sale of $27.2 billion of mortgage-backed securities that proved defective during the U.S. housing and financial crises.
- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action litigation alleging RALI and its affiliates sold shoddy MBS securities that did not meet the standards of their underwriters. Mr. Speirs was a critical member of the team of litigators, conducting fact discovery, deposing economic experts and preparing witnesses.
- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team.

- Sino-Forest Corp. Securities Litigation: Cohen Milstein served as lead counsel for U.S. investors in securities fraud class action brought on behalf of investors in Sino-Forest Corp., a Canadian corporation, which achieved $150 million in settlements from numerous defendants.
- Ebix Derivative Litigation: Cohen Milstein was lead counsel in a class action lawsuit alleging that Ebix's board of directors breached their duties to shareholders in misrepresenting the company's financial results and organic growth and in internal controls over financial reporting. The settlement resulted in the adoption of significant corporate governance improvements including the appointment of a Lead Independent Director, increasing the number of directors on the corporate governance committee, and creating a director of audit and director of internal tax positions to report directly to the Audit Committee.
- Dynex Capital Securities Fraud Litigation: Cohen Milstein was lead counsel in a class action suit alleging that Dynex Capital, a real estate investment trust, lied about the quality of mobile loans used as collateral for asset-backed loans sold to investors. The $7.5 million settlement is significant in having provided a road map for future asset-backed securities class action litigation.

Mr. Speirs' current notable matters include:

- Bank Leumi Derivative Litigation: $400 million derivative suit against the directors and officers of Bank Leumi, an Israeli bank, asserting that bank officers violated their fiduciary duties in conspiring to aid American taxpayers in hiding income from the IRS.
- Intuitive Surgical Inc. Derivative Litigation: Pending derivative action against the company's directors and officers, asserting breaches of fiduciary duties and insider trading claims in connection with concealing regulatory compliance problems and safety defects in the company's flagship product, the da Vinci robotic surgery system.
- BioScrip Derivative Litigation: Derivative action alleging that BioScrip's directors and officers disregarded regulatory and compliance requirements while engaging in a scheme in which the company accepted illegal kickbacks from Novartis Pharmaceuticals Corp. on the sale of a dangerous Novartis drug resulting in government investigations, penalties and other sanctions.

In a career spanning more than 30 years, Mr. Speirs has been lead or co-lead attorney in a number of securities class actions where the court has issued an important decision under the federal securities laws. Among the issues decided were: the improper grouping of unaffiliated investors in a lead plaintiff motion; recommendation of default sanction against auditing firm for discovery misconduct involving electronic audit work papers; and liability under Section 10(b) of a non-issuer for disclosures made by the issuer.

Mr. Speirs has appeared on numerous panels and legal events to discuss securities fraud and investor protection. He attended Brooklyn College of the City University of New York, where he received a B.A., *cum laude*, and earned his J.D. at Brooklyn Law School, where he earned the Order of the Coif.

Catherine A. Torell

Catherine A. Torell is the Director of Securities Research and Analysis at Cohen Milstein, and is a member of the Securities Litigation & Investor Protection Practice Group. As Director of Securities Research and Analysis, Ms. Torell has the exclusive role of analyzing every securities case that is brought to the Firm.

In this role, Ms. Torell is responsible for thoroughly researching the factual and legal merits of all of the federal securities fraud class action filed in the United States. On the basis of her research, she generates written analyses to evaluate the merits of each case for the Firm's Case Evaluation Committee and assesses the potential importance of the case to the Firm's clients. Ms. Torell also prepares the written analyses that are sent to the Firm's institutional clients. Those analyses describe and evaluate the merits of the cases in which those clients have sustained substantial losses and include a recommendation regarding as to whether the Firm believes the client should pursue a lead plaintiff role in the case. Since joining Cohen Milstein in 2002, she has played an integral role in helping to significantly expand the Firm's client base.

In addition to the foregoing, Ms. Torell has played also participated in litigating some of the Firm's most important cases, including such notable matters as:

- In re Parmalat Securities: $90 million settlement. Cohen Milstein was co-lead counsel in a class action lawsuit involving Parmalat, a company often referred to as "Europe's Enron." The litigation involved the biggest fraud in European history, in which revenues were manufactured out of thin air and numerous Parmalat executives were indicted and went to prison. The litigation included settlements with the company's two outside auditors. Ms. Torell was an important member of the litigation team, helping to prepare pleadings and motions papers in the case.

Ms. Torell, joined the Firm in 2002 and has been practicing law for 25 years. Prior to joining Cohen Milstein, Ms. Torell was counsel at a number of prominent plaintiffs' class action firms, serving in co-lead and leadership positions in numerous successful class action cases that resulted in settlements collectively totaling hundreds of millions of dollar for the clients she represented. She served as a co-lead counsel in In re Providian Financial Securities Litigation, which resulted in a $38 million settlement. In approving the settlement, the Court remarked on the "extremely high quality" and "skill and efficiency" of plaintiffs' counsel's work throughout the litigation.

Ms. Torell attended Stony Brook University, receiving a B.A., magna cum laude, in Political Science, and earned her J.D. from St. John's University School of Law, where she was the recipient of the Federal Jurisprudence Award.

Times Wang

Times Wang is an Associate at Cohen Milstein and a litigator in the firm's Securities Litigation & Investor Protection practice group. Before joining Cohen Milstein in 2014, Mr. Wang was an associate at a top-tier litigation firm in California.

Currently, Mr. Wang is litigating the following matters:

- Harman Industries International Inc. Securities Litigation: Mr. Wang is a member of the Cohen Milstein team litigating a class action suit against Harman International Industries, Inc., in which Cohen Milstein was successful in obtaining a ruling by the D.C. Court of Appeals for the D.C. Circuit reversing the dismissal of the case and remanding it to the U.S. District Court for further proceedings. The ruling represents a significant win for investors in that it limits the scope of protection afforded by the so-called "safe harbor" for forward-looking statements in the Private Securities Litigation Reform Act of 1995. Mr. Wang was the principal drafter of the briefs in the successful appeal.

- BP Securities Litigation: A class action lawsuit arising out of the disastrous Deepwater oil spill in the Gulf of Mexico. Among other things, the lawsuit alleges that BP misled investors about the severity and financial impact of the Deepwater spill. The U.S. Court of Appeals for the Fifth Circuit recently affirmed class certification for those allegations. Cohen Milstein is co-lead counsel in the litigation, which is ongoing. Mr. Wang joined the litigation team as it headed towards trial.

His successes include:

- HEMT MBS Litigation: $110 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that Credit Suisse sold shoddy mortgage-backed securities, which did not meet underwriting standards, to investors. Mr. Wang was a key member of the Cohen Milstein team from depositions through summary judgment and Daubert briefing. During summary judgment and Daubert briefing, Mr. Wang was particularly focused on loss causation issues, working closely with an outside economics expert.
- ITT Educational Services Inc. Securities Litigation: $16.96 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that ITT and two officers misrepresented and omitted ITT's liabilities under certain risk-sharing agreements it had entered into with third-party student loan lenders. Mr. Wang was responsible for the class certification briefing, working extensively with the firm's outside economics expert.
- U.S. Navy Humanist Chaplain Litigation: Mr. Wang, along with other Cohen Milstein attorneys, represented Jason Heap, a humanist who sued the U.S. Navy for rejecting his application to become a chaplain on the basis of his humanist beliefs. After hard-fought discovery, during which Mr. Wang took the depositions of several senior U.S. Navy officials, the case settled.

Mr. Wang is a graduate of McGill University in Montreal, where he earned a B.A. in East Asian Studies, with Great Distinction, in 2007. He earned his J.D., *cum laude*, from New York University School of Law in 2011, serving as Articles Editor for the *Annual Survey of American Law*. During law school, Mr. Wang interned at Human Rights in China and served as Human Rights Chair of NYU's Asia Law Society.

Jessica Weiner

Jessica Weiner is an Associate at Cohen Milstein, and a member of the Antitrust practice group. In this role, Ms. Weiner represents a broad range of individuals and businesses in civil litigation, with a focus on multi-district class actions and antitrust litigation.

Prior to joining the firm, Ms. Weiner clerked for the Honorable Helene N. White of the U.S. Court of Appeals for the Sixth Circuit. She also clerked for the Honorable Lawrence E. Kahn of the U.S. District Court for the Northern District of New York.

Ms. Weiner graduated from Cornell University with a B.A. in Industrial and Labor Relations in 2009. She received her J.D. from Harvard Law School, *cum laude*, in 2014. During law school, Ms. Weiner served as an Article Editor and Online Editor of the Harvard Journal of Law & Gender.

Ms. Weiner is not admitted in the District of Columbia; her practice is under the supervision of partners of the firm.

EXHIBIT B

EXHIBIT B

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

Firm Name: Cohen Milstein Sellers & Toll, PLLC

Reporting Period: March 1, 2017 to April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Small, Daniel (P)												2.30			2.30	$940	$2,162.00
Brown, Benjamin, D. (P)												2.50			2.50	$810	$2,025.00
Johnson, Brent (P)												0.90			0.90	$755	$679.50
Alexander, Laura (P)												100.00			100.00	$645	$64,500.00
Prince, Joshua (SA)												11.90			11.90	$445	$5,295.50
SUB-TOTAL	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**117.60**	**-**	**-**	**117.60**		**$74,662.00**
NON-ATTORNEYS																	
Clayton, Jay												18.20			18.20	$300.00	$5,460.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**18.20**	**0.00**	**0.00**	**18.20**		**$5,460.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**135.80**	**0.00**	**0.00**	**135.80**		**$80,122.00**

EXHIBIT C

Date	TKPR Name	Client	Client Name	ToBill Hrs	Rate	Lodestar	Narrative
4/13/2017	Johnson, Brent	22420	Lithium Ion Battery Manufacturers	0.30	685	205.50	Confer with K. Pierson re [redacted]
9/12/2018	Johnson, Brent	22420	Lithium Ion Battery Manufacturers	0.30	715	214.50	Confer with D. Small and K. Pierson re [redacted]
9/12/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.50	900	450.00	Teleconference with Friedman (3); emails to Johnson, Levens et al (.2)
9/13/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.30	900	270.00	Meeting with Brown re [redacted]
9/14/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.30	900	270.00	Emails to Friedman, Brown, Johnson re [redacted]
9/14/2018	Johnson, Brent	22420	Lithium Ion Battery Manufacturers	0.30	715	214.50	Confer with L. Alexander re [redacted] (.2); confer with D. Small re [redacted] (.1)
9/27/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.10	900	90.00	Emails to Scarlett, Alexander, Johnson re [redacted]
10/4/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.30	900	270.00	Email to Alexander re Braun [redacted]
10/10/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	1.80	290	522.00	Preliminary discussions re: [redacted] (.3); reviewing case materials to catch up on status of case (1.5)
10/23/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	1.30	290	377.00	Searching for excerpts of record from [redacted] for use in [redacted]
10/25/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	1.80	290	522.00	Prep work in advance of [redacted]
10/26/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	7.50	290	2,175.00	Cite-checking [redacted] for [redacted]
10/29/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.30	900	270.00	Email to Johnson, Brown re [redacted]
10/31/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	3.00	290	870.00	Further [redacted] of [redacted] on behalf of [redacted]
10/4/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	0.50	605	302.50	Teleconference with S. Scarlett re [redacted].
10/26/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	11.50	605	6,957.50	Edit and revise [redacted] re [redacted].
10/25/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Edit and revise [redacted] re [redacted].
10/31/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	2.00	605	1,210.00	Finalize and submit [redacted] re [redacted].
10/2/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	2.00	605	1,210.00	Review materials and begin research for [redacted] re [redacted].
10/3/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	2.00	605	1,210.00	Conduct legal research for [redacted] re [redacted].
10/31/2018	Small, Daniel	22420	Lithium Ion Battery Manufacturers	0.50	900	450.00	Reviewed draft of [redacted] re [redacted] (.4); email to Alexander re [redacted] (.1)
10/24/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	7.00	605	4,235.00	Research and draft [redacted] re [redacted].
10/23/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	8.00	605	4,840.00	Research and draft [redacted] re [redacted].
10/22/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/22/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/18/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/17/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	4.00	605	2,420.00	Research and draft [redacted] re [redacted].
10/16/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/15/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/12/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	2.00	605	1,210.00	Research and draft [redacted] re [redacted].
10/11/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	5.00	605	3,025.00	Research and draft [redacted] re [redacted].
10/10/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	3.00	605	1,815.00	Research and draft [redacted] re [redacted].
10/9/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	4.00	605	2,420.00	Research and draft [redacted] re [redacted].
10/8/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	6.00	605	3,630.00	Research and draft [redacted] re [redacted].
10/4/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	5.00	605	3,025.00	Research and draft [redacted] re [redacted].
10/30/2018	Brown, Benjamin, D.	22420	Lithium Ion Battery Manufacturers	2.50	770	1,925.00	Review and revise [redacted] for batteries (2.3); correspondence with Ms. Alexander re [redacted] (.2)
11/20/2018	Clayton, Jay	22420	Lithium Ion Battery Manufacturers	2.80	290	812.00	Cite-checking [redacted] - response to [redacted]
11/13/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	1.00	605	605.00	Finalize and submit [redacted] re [redacted].
11/20/2018	Alexander, Laura	22420	Lithium Ion Battery Manufacturers	1.00	605	605.00	Finalize and submit [redacted].
11/14/2018	Prince, Joshua	22420	Lithium Ion Battery Manufacturers	2.30	415	954.50	Draft [redacted] reply re: [redacted]
11/15/2018	Prince, Joshua	22420	Lithium Ion Battery Manufacturers	6.00	415	2,490.00	Draft [redacted] reply re: [redacted]
11/16/2018	Prince, Joshua	22420	Lithium Ion Battery Manufacturers	2.80	415	1,162.00	Draft [redacted] reply re: [redacted]
11/19/2018	Prince, Joshua	22420	Lithium Ion Battery Manufacturers	0.80	415	332.00	Draft [redacted] reply re: [redacted]
				135.80		**$ 75,346.00**	

EXHIBIT D

EXHIBIT D

IN RE Lithium Ion Batteries Antitrust Litigation

COHEN MILSTEIN SELLERS & TOLL, PLLC

Reported Expenses Incurred on Behalf of IPPs

June 1, 2013 to April 1, 2019

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	50,000.00
Court Fees (Filing, etc.)	350.00
Document Production	
Experts/Consultants	
Federal Express	33.32
Transcripts (Hearing, Deposition, etc)	
Investigation	
Lexis/Westlaw	749.46
Messenger/Delivery	42.16
Photocopies - In House (Capped at $0.20 per Copy)	
Photocopies - Outside	
Postage	
Service of Process	
Supplies	
Telephone / Telecopier	119.25
Travel	35.91
Miscellaneous	
TOTAL:	**$51,330.10**

EXHIBIT 19

Kit A. Pierson (*pro hac vice*)
Brent W. Johnson (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL PLLC
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Washington, DC 20005
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Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF BRENT W. JOHNSON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF COHEN MILSTEIN SELLERS & TOLL PLLC**

I, BRENT W. JOHNSON, declare:

1. I am a Partner at Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel for named plaintiff Brian Hanlon and as counsel for the IPPs throughout the course of this litigation. The background and experience of Cohen Milstein and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Cohen Milstein performed the following work: preparing the document productions, interrogatory responses and other discovery responses from the named plaintiffs, reviewing documents from the Defendants' productions and conferring with lead counsel regarding them, drafting briefing concerning certain issues during motion practice and researching the same, among other tasks.

5. Attached hereto as **Exhibit B** is a billing summary of Cohen Milstein's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Cohen Milstein during this period of time was 2,938.30, with a corresponding lodestar based on current rates of $1,023,157.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Cohen Milstein.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Cohen Milstein has incurred during the course of this litigation. Cohen Milstein expended a total of $641.60 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Cohen Milstein on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Cohen Milstein in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 in Washington, DC.

/s/Brent W. Johnson

Brent W. Johnson

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

COHEN MILSTEIN

COHEN MILSTEIN

COHEN MILSTEIN SELLERS & TOLL PLLC

For decades, Cohen Milstein Sellers & Toll PLLC has represented individuals, small businesses, institutional investors, and employees in many of the major class action cases litigated in the United States for violations of the antitrust, securities, consumer protection, civil rights/discrimination, ERISA, employment, and human rights laws. Cohen Milstein is also at the forefront of numerous innovative legal actions that are expanding the quality and availability of legal recourse for aggrieved individuals and businesses both domestic and international. Over its history, Cohen Milstein has obtained many landmark judgments and settlements for individuals and businesses in the United States and abroad. The firm's most significant past and present cases include:

- HEMT MBS Litigation, (No. 1:08-cv-05653, U.S. District Court for the Southern District of New York). On May 10, 2016, U.S. District Judge Paul A. Crotty finally approved a $110 million settlement in the mortgage-backed securities class action brought by investors against Credit Suisse AG and its affiliates. This settlement ends claims brought by the New Jersey Carpenters Health Fund and other investors who claimed that the offering documents for the mortgage-backed securities at issue violated the Securities Act as they contained false and misleading misstatements concerning compliance with underwriting standards.

- In re Urethane Antitrust Litigation (Polyether Polyol Cases) (D. Kan.). Cohen Milstein serves as co-lead counsel on behalf of a class of direct purchasers of chemicals used to make many everyday products, from mattress foam to carpet cushion, who were overcharged as a result of a nationwide price-fixing conspiracy. On February 25, 2016, Cohen Milstein reached an agreement with The Dow Chemical Company to settle the case against Dow for $835 million. Combined with earlier settlements obtained from Bayer, Huntsman, and BASF, the Dow settlement pushed the total settlements in the case to $974 million. The settlement was approved on July 29, 2016.

- RALI MBS Litigation, (Civ. No. 08-8781, U.S. District Court for the Southern District of New York). In July 2015 On July 31, 2015, Judge Katherine Failla gave final approval to a $235 million settlement with underwriters Citigroup Global Markets Inc., Goldman Sachs & Co., and UBS Securities LLC. She also approved a plan for distribution to investors of those funds as well as the previously approved $100 million settlement with RALI, its affiliates, and the individual Defendants that was reached in in 2013. This global settlement marks an end to a long and complicated class action over MBS offerings that RALI and certain of its affiliates issued and sold to the New Jersey Carpenters Health Fund and other investors from 2006 through 2007. The case took seven years of intense litigation to resolve.

- In re: Bear Stearns Mortgage Pass-Through Certificates Litigation (No. 08-08093, U.S. District Court for the Southern District of New York). On May 27, 2015, U.S. District Judge Laura Taylor Swain finally approved a class action settlement with JPMorgan Chase & Co., which agreed to pay $500 million and up to an additional $5 million in litigation-related expenses to resolve claims arising from the sale of $27.2 billion of mortgage-backed securities issued by Bear Stearns & Co. during 2006 and 2007 in 22 separate public offerings.

- Harborview MBS Litigation, (No. 08-5093, U.S. District Court for the Southern District of New York). In February 2014, Cohen Milstein reached a settlement with the Royal Bank of Scotland (RBS) in the Harborview MBS Litigation, resolving claims that RBS duped investors into buying securities backed by shoddy home loans. The $275 million settlement is the fifth largest class action settlement in a federal MBS case. This case is one of eight significant MBS actions that Cohen Milstein has been named lead or co-lead counsel by courts and one of three that were nearly thrown out by the court, only to be revived in 2012.
- In Re Electronic Books Antitrust Litigation, (No. 11-md-02293, U.S. District Court for the Southern District of New York). In August 2014, a New York federal judge approved a $400 million antitrust settlement in the hotly contested ebooks price-fixing suit against Apple Inc. Combined with $166 million in previous settlements with five defendant publishing companies, consumers could receive more than $560 million. The settlement resolves damages claims brought by a class of ebook purchasers and attorneys general from 33 U.S. states and territories.

- Countrywide MBS Litigation, (2:10-cv-00302, U.S. District Court in the Central District of California). In April 2013, Plaintiffs in the landmark mortgage-backed securities (MBS) class action litigation against Countrywide Financial Corporation and others, led by Lead Plaintiff, the Iowa Public Employees' Retirement System (IPERS), agreed to a $500 million settlement. It is the nation's largest MBS-federal securities class action settlement. The settlement was approved in December 2013 and brings to a close the consolidated class action lawsuit brought in 2010 by multiple retirement funds against Countrywide and other defendants for securities violations involving the packaging and sale of MBS. The settlement is also one of the largest (top 20) class action securities settlements of all time.

- In re Beacon Associates Litigation (No. 09-cv-0777, United States District Court for the Southern District of New York). Class action settlement of $219 million for trustees and participants in ERISA-covered employee benefit plans whose assets were lost through investments made on their behalf by Beacon Associates LLC I & II in the investment schemes of Bernard Madoff.

- In re Plasma-Derivative Protein Therapies Antitrust Litigation (No. 09 C 7666, United States District Court for the Northern District of Illinois). After four years of litigation, in October of 2013, CSL Limited, CSL Behring LLC, CSL Plasma, Inc. (collectively, "CSL"), and the Plasma Protein Therapeutics Association ("PPTA") agreed to pay $64 million dollars to settle a lawsuit brought by the University of Utah Hospital and other health care providers alleging that CSL, the PPTA, and Baxter agreed between 2003-2009 to restrict the supply of immunoglobulin and albumin, and thereby increase the prices of those therapies. Two months later, Baxter International Inc. and Baxter Healthcare Corp. (collectively "Baxter") agreed to pay an additional $64 million to settle these claims – bringing the total recovery to the class to $128 million.

- Keepseagle v. Vilsack, Civil Action No. 1:99CV03119 (D.D.C.). A class of Native American farmers and ranchers allege that they have been systematically denied the same opportunities to obtain farm loans and loan servicing that have been routinely afforded white farmers by the USDA. A class was certified in 2001 by Judge Emmet Sullivan, District Judge for the U.S. District Court for the District of Columbia, and the D.C. Circuit declined USDA's request to review that decision. On October 19, 2010, the case reached a historic settlement, with the USDA agreeing to pay $680 million in damages to thousands of Native American farmers and ranchers and forgive up to $80 million worth of outstanding farm loan

debt.

- In re Parmalat Securities Litigation, No. 04 MD 1653 (S.D.N.Y.). In this securities litigation case, Cohen Milstein has successfully negotiated two partial settlements totaling approximately $90 million. At the second partial settlement hearing, Judge Lewis A. Kaplan remarked that plaintiffs counsel "did a wonderful job here for the class and were in all respects totally professional and totally prepared. I wish I had counsel this good in front of me in every case." Our clients, four large European institutional investors, were appointed as co-lead plaintiffs and we were appointed as co-lead counsel. Most notably, this case allowed us the opportunity to demonstrate our expertise in the bankruptcy area. During the litigation, the company subsequently emerged from bankruptcy and we added "New Parmalat" as a defendant because of the egregious fraud committed by the now-bankrupt old Parmalat. New Parmalat strenuously objected and Judge Kaplan of the Southern District of New York ruled in the class plaintiffs' favor, a ruling which was affirmed on appeal. This innovative approach of adding New Parmalat enabled the class to obtain an important additional source of compensation, as we subsequently settled with New Parmalat.

- Dukes v. Wal-Mart Stores, Inc., No. C-01-2252 (N.D. Cal.). Cohen Milstein is co-lead counsel in this sex discrimination case. In 2004, the U.S. District Court certified a nationwide class action lawsuit for all female employees of Wal-Mart who worked in U.S. stores anytime after December 26, 1998. This was the largest civil rights class action ever certified against a private employer, including approximately 1.5 million current and former female employees. That ruling was appealed, and while affirmed by the Ninth Circuit, was reversed by the Supreme Court in June 2011. Cohen Milstein argued the case for the plaintiffs-respondents in the Supreme Court. Since then, the *Dukes* action has been amended to address only the Wal-Mart regions that include stores in California, and other regional class cases have been or are soon to be filed. This litigation to resolve the merits of the claims – whether Wal-Mart discriminates against its female retail employees in pay and promotions – continues.

- Rubin v. MF Global, Ltd. (08-CV-02233, S.D.N.Y.). Acting as co-lead counsel in this class action, the Firm represented the Central States, Southeast and Southwest Areas Pension Fund which was one of the co-lead plaintiffs in the case. In September 2010, as a result of Plaintiffs' decision to appeal, the U.S. Second Circuit Court of Appeals vacated in part the lower court's dismissal of the case and remanded the case for further proceedings. In overturning the District Court decision, the Second Circuit issued a decision which differentiated between a forecast or a forward looking statement accompanied by cautionary language -- which the Appellate Court said would be insulated from liability under the bespeaks caution doctrine -- from a factual statement, or non-forward-looking statement, for which liability may exist. Importantly, the Second Circuit accepted Plaintiffs' position that where a statement is mixed, the court can sever the forward-looking aspect of the statement from the non-forward looking aspect. The Court further stated that statements or omissions as to existing operations (and present intentions as to future operations) are not protected by the bespeaks caution doctrine. Mediation followed this decision and resulted in a settlement comprised of $90 million in cash.

- Hughes v. Huron Consulting Group (09-CV-04734, N.D. Ill.). Cohen Milstein represented lead plaintiffs the Public School Teachers' Pension & Retirement Fund of Chicago and the Arkansas Public Employees Retirement System ("APERS") in this case against Huron Consulting Group, founded by former Arthur Anderson personnel following its collapse in the wake of the Enron scandal. In August 2010, the District Court for the Northern District of Illinois denied defendants' motions to dismiss in their entirety and upheld plaintiffs' allegations that defendants intentionally improperly accounted for acquisition-

related payments, which allowed plaintiffs to move forward with discovery. The case was settled for $40 million, comprised of $27 million in cash and 474,547 shares in Huron common stock, with an aggregate value at the time of final approval in 2011 of approximately $13 million.

- In re Lucent Technologies Securities Litigation, Civ. Action No. 00-621 (JAP) (D.N.J.). A settlement in this massive securities fraud class action was reached in late March 2003. The class portion of the settlement amounts to over $500 million in cash, stock and warrants and ranks as the second largest securities class action settlement ever completed. Cohen Milstein represented one of the co-lead plaintiffs in this action, a private mutual fund.

- Nate Pease, et al. v. Jasper Wyman & Son, Inc., et al., Civil Action No. 00-015 (Knox County Superior Court, Me.). In 2004, a state court jury from Maine found three blueberry processing companies liable for participating in a four-year price-fixing and non-solicitation conspiracy that artificially lowered the prices defendants paid to approximately 800 growers for wild blueberries. The jury ordered defendants Cherryfield Foods, Inc., Jasper Wyman & Son, Inc., and Allen's Blueberry Freezer, Inc. to pay $18.68 million in damages, the amount which the growers would have been paid absent the defendants' conspiracy. After a mandatory trebling of this damage figure under Maine antitrust law, the total amount of the verdict for the plaintiffs is just over $56 million. The Firm served as co-lead counsel.

- In re StarLink Corn Products, Liability Litigation, MDL No. 1403. (N.D. Ill.). Cohen Milstein successfully represented U.S. corn farmers in a national class action against Aventis CropScience USA Holding and Garst Seed Company, the manufacturer and primary distributor of StarLink corn seeds. StarLink is a genetically modified corn variety that the United States government permitted for sale as animal feed and for industrial purposes, but never approved for human consumption. However, StarLink was found in corn products sold in grocery stores across the country and was traced to widespread contamination of the U.S. commodity corn supply. The Firm, as co-lead counsel, achieved a final settlement providing more than $110 million for U.S. corn farmers, which was approved by a federal district court in April 2003. This settlement was the first successful resolution of tort claims brought by farmers against the manufacturers of genetically modified seeds.

- Snyder v. Nationwide Mutual Insurance Company, No. 97/0633 (Sup. Ct. N.Y. Onondaga Cty.). Cohen Milstein served as one of plaintiffs' principal counsel in this case on behalf of persons who held life insurance policies issued by Nationwide through its captive agency force. The action alleged consumer fraud and misrepresentations. Plaintiffs obtained a settlement valued at more than $85 million. The judge praised the efforts of Cohen Milstein and its co-counsel for having done "a very, very good job for all the people." He complimented "not only the manner" in which the result was arrived at, but also the "time … in which it was done."

- Oncology & Radiation Associates, P.A. v. Bristol Myers Squibb Co., et al., No. 1:01CV02313 (D.D.C.). Cohen Milstein has been co-lead counsel in this case since its inception in 2001. Plaintiffs alleged that Bristol-Myers Squibb unlawfully monopolized the United States market for paclitaxel, a cancer drug discovered and developed by the United States government, which Bristol sells under the brand name Taxol. Bristol's scheme included a conspiracy with American BioScience, Inc., a generic manufacturer, to block generic competition. Cohen Milstein's investigation and prosecution of this litigation on behalf of direct purchasers of Taxol led to a settlement of $65,815,000 that was finally approved by U.S. District Judge Emmet G. Sullivan on August 14, 2003 and preceded numerous Taxol-related litigations

brought by the Federal Trade Commission and State Attorneys General offices.

- Kruman v. Christie's International PLC, et al., Docket No. 01-7309. A $40 million settlement on behalf of all persons who bought or sold items through Christie's or Sotheby's auction houses in non-internet actions was approved in this action. Cohen Milstein served as one of three leading counsel on behalf of foreign plaintiffs. The Court noted that approval of the settlement was particularly appropriate, given the significant obstacles that faced plaintiffs and plaintiffs' counsel in the litigation. The settlement marked the first time that claims on behalf of foreign plaintiffs under U.S. antitrust laws have been resolved in a U.S. court, a milestone in U.S. antitrust jurisprudence.

- Roberts v. Texaco, Inc., 94-Civ. 2015 (S.D.N.Y.). Cohen Milstein represented a class of African-American employees in this landmark litigation that resulted in the then-largest race discrimination settlement in history ($176 million in cash, salary increases and equitable relief). The Court hailed the work of class counsel for, *inter alia,* "framing an imaginative settlement, that may well have important ameliorative impact not only at Texaco but in the corporate context as a whole …".

- Trotter v. Perdue Farms, Inc., Case No. 99-893 (RRM) (JJF) (MPT), D. Del. This suit on behalf of hourly workers at Perdue's chicken processing facilities – which employ approximately 15,000 people – forced Perdue to pay employees for time spent "donning and doffing," that is, obtaining, putting on, sanitizing and removing protective equipment that they must use both for their own safety and to comply with USDA regulations for the safety of the food supply. The suit alleged that Perdue's practice of not counting donning and doffing time as hours worked violated the Fair Labor Standards Act and state law. In a separate settlement with the Department of Labor, Perdue agreed to change its pay practices. In addition, Perdue is required to issue retroactive credit under one of its retirement plans for "donning and doffing" work if the credit would improve employees' or former employees' eligibility for pension benefits. Cohen Milstein was co-lead counsel.

Awards & Recognition

In 2017, Law360 selects Cohen Milstein as a Competition Practice Group of the Year and a Class Action Practice Group of the Year.

In 2016, Law360 Names Cohen Milstein's Richard A. Koffman a Competition Law MVP.

In 2016, Cohen Milstein Partner Martha Geer was selected as a 2016 North Carolina Leaders in the Law Honoree.

In 2016, the Washington Lawyers' Committee for Civil Rights and Urban Affairs named Cohen Milstein Sellers & Toll a recipient of its 2016 Outstanding Achievement Award.

In 2016, for the eighth consecutive year, Cohen Milstein was recognized by The Legal 500 as one of the leading plaintiff class action antitrust firms in the United States.

In 2016, Agnieszka Fryszman, Joel Laitman, Chris Lometti, Kit Pierson, Joe Sellers and Steve Toll were named to the 2016 Lawdragon 500 Leading Lawyers in America. As one of the most elite distinctions in the legal profession, the annual Lawdragon 500 recognizes the 'best of the best' of the 1.2 million members of the U.S. legal profession.

In 2016, Law360 named Cohen Milstein Partner Julie Goldsmith Reiser one of the 25 Most Influential Women in Securities Law.

In 2016, Cohen Milstein is named to the National Law Journal's "Plaintiffs Hot List" for the fifth time in six years.

In 2016, Law360 names Cohen Milstein as one of the top firms for female attorneys.

In 2015, Law360 selects Cohen Milstein as the sole plaintiff firm to be selected in two "Practice Groups of the Year" categories and one of only five class action firms recognized.

In 2015, Cohen Milstein was named an Elite Trial Lawyer Firm by the National Law Journal for the second year in a row.

In 2015, Cohen Milstein Partner Steven J. Toll named a Law360 MVP in Securities Law.

In 2015, Cohen Milstein is selected as a "Most Feared Plaintiffs Firm" by Law360 for the third year in a row.

In 2015, Partner Richard Koffman was named, for the fifth consecutive year, in the Legal 500 United States "Leading Lawyers" list under the category of "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust".

In 2015, Cohen Milstein Attorney Jeffrey Dubner was named a National Law Journal D.C. Rising Star.

In 2015, five Cohen Milstein Attorneys were named to the 2016 The Best Lawyers in America© list.

In 2015, Cohen Milstein's Denver office was named "Antitrust Law Firm of the Year – Colorado" by Global Law Experts.

In 2015, Partners Theodore J. Leopold and Leslie M. Kroeger and Of Counsel Attorney Stephan A. LeClainche were selected to the 2015 Florida Super Lawyers list and Adam J. Langino was selected to the Florida Rising Stars list.

In 2015, Cohen Milstein attorneys R. Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll and Christine E. Webber were selected as Washington DC Super Lawyers.

In 2015, Cohen Milstein attorneys Laura Alexander, Monya Bunch, S. Douglas Bunch, Joshua S. Devore, Jeffrey Dubner, Johanna Hickman, Kalpana Kotagal, Emmy Levens, and David Young were selected as Washington DC Rising Stars by Super Lawyers.

In 2015, for the fourth time in five years, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**

In 2015, Cohen Milstein Partner Carol V. Gilden was selected as "Pension Funds Litigation Attorney of the Year in Illinois" for the second year in a row by the Corporate INTL Legal Awards.

In 2014, Cohen Milstein's Antitrust Practice was selected as a Practice Group of the Year by Law360.

In 2014, Cohen Milstein Partner Kit Pierson was selected as an MVP by Law360.

In 2014, Cohen Milstein was named a "**Most Feared Plaintiffs Firm**" by Law360 for the second year in a row.

In 2014, Cohen Milstein was selected as an **Elite Trial Lawyer** firm by the National Law Journal.

Cohen Milstein Partners Steven J. Toll, Joseph M. Sellers, Kit A. Pierson, and Agnieszka M. Fryszman Selected to the **2014 Lawdragon 500**.

Joseph M. Sellers, Theodore J. Leopold, and Leslie M. Kroeger Make "**Best Lawyers**' List" for 2015.

Released in 2014, the 2013 SCAS 50 Report on Total Securities Class Action Settlements once again ranked Cohen Milstein as a top firm.

In 2014, Theodore J. Leopold, a partner at Cohen Milstein, was been selected to the Top 100 Miami Florida Super Lawyers list. Partner Leslie M. Kroeger was selected to the **2014 Florida Super Lawyers** list and Diana L. Martin was selected to the **Florida Rising Stars** list.

In 2014, Cohen Milstein attorneys Leslie M. Kroeger and Adam J. Langino were both recognized in the 2014 edition of **Florida Trend's Florida Legal Elite**™. Kroeger is recognized as Legal Elite and Langino is listed as an Up-and-Comer.

In 2014, Cohen Milstein was selected to the selected to the **National Law Journal's Midsize Hot List**.

In 2014, Cohen Milstein was recognized as a "**Highly Recommended Washington, DC Litigation Firm**" by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2014, Cohen Milstein was ranked as a **Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500** for the sixth year in a row.

In 2014, Partner Richard Koffman was named, for the fourth consecutive year, in the Legal 500 United States "**Leading Lawyers**" list under the category of "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust".

In 2014, Cohen Milstein attorneys Christopher Cormier, Agnieszka Fryszman, Julie Goldsmith Reiser, Joseph Sellers, Daniel Sommers, and Steven Toll were recognized **as Local Litigation Stars** by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2014, Cohen Milstein attorneys R. Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll and Christine E. Webber were selected as **Washington DC Super Lawyers**.

In 2014, Cohen Milstein attorneys Laura Alexander, Monya Bunch, S. Douglas Bunch, Joshua S. Devore, Jeffrey Dubner, Johanna Hickman, Joshua Kolsky, Kalpana Kotagal, Emmy Levens, Michelle Yau and David Young were selected as **Washington DC Rising Stars** by Super Lawyers.

In 2014, Cohen Milstein Partner Carol V. Gilden was selected as the Illinois Pension Fund Attorney of the Year.

In 2014, Best Lawyers named Cohen Milstein Partner Joseph Sellers D.C. Litigation - Labor & Employment Lawyer of the Year.

In 2013, for the third-year in a row, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2013, Cohen Milstein was named a "**Most Feared Plaintiffs Firm**" by Law360.

In 2013, Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500 for the fifth year in a row.

In 2013, Cohen Milstein attorneys Joseph Barton, Andrew Friedman, Agnieszka Fryszman, Karen Handorf, Kit A. Pierson, Julie G. Reiser, Joseph M. Sellers, Daniel A. Small, Daniel S. Sommers, Steven J. Toll, and Christine E. Webber were selected as **Washington DC Super Lawyers**.

In 2013, Cohen Milstein attorneys Joshua Devore and Michelle Yau were selected as **Washington DC Rising Stars** by Super Lawyers.

In 2013, Cohen Milstein Partner Carol V. Gilden was selected as a **2013 Illinois Super Lawyer**. She has been selected every year since 2005.

In 2012, for the second-year in a row, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2012, Cohen Milstein was the recipient of the Judith M. Conti Pro Bono Law Firm of the Year Award from the Employment Justice Center.

In 2012, Cohen Milstein was recognized as a "Highly Recommended Washington, DC Litigation Firm" by Benchmark Plaintiff: The Definitive Guide to America's Leading Plaintiff Firms and Attorneys.

In 2012, Cohen Milstein was ranked as a top firm by the 2011 SCAS Report on Total Securities Class Action Settlements.

In 2012, Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States by the Legal 500 for the fourth year in a row.

In 2012, Partner Joseph M. Sellers was selected as a **Washington DC Super Lawyer**. Mr. Sellers was also selected for this prestigious award in 2007, 2008, 2009, 2010, and 2012.

In 2012, Partner Steven J. Toll was selected as a **Washington DC Super Lawyer**. Mr. Toll was also selected for this prestigious award in 2007, 2009, 2010, and 2011.

In 2012, Partner Daniel S. Sommers was selected as a **Washington DC Super Lawyer**. Mr. Sommers was also selected for this prestigious award in 2011.

In 2012, Partner Christine E. Webber was selected as a **Washington DC Super Lawyer**. Ms. Webber was also selected for this prestigious award in 2007.

In 2012, Partner Agnieszka M. Fryszman was selected as a **Washington DC Super Lawyer**.

In 2012, Partner Kit A. Pierson was selected as a **Washington DC Super Lawyer**.

In 2012, Partner Carol V. Gilden was selected as an **Illinois Super Lawyer**. Ms. Gilden was also selected for this prestigious award in 2005, 2006, 2007, 2008, 2009, 2010, and 2011.

In 2011, Cohen Milstein was selected to the *National Law Journal* **Plaintiffs' Hot List**.

In 2011, Partner Joseph M. Sellers was selected as a **"Visionary"** by The *National Law Journal.*

In 2011, Partner J. Douglas Richards, Of Counsel Joel Laitman, and Of Counsel Christoper Lometti were selected as **New York - Metro Super Lawyers**.

In 2011, Partner Joseph M. Sellers and the *Keepseagle v. Vilsack* team were selected as a finalist for the **2011 Trial Lawyer of the Year Award** from the Public Justice Foundation.

In 2011, **Cohen Milstein was ranked as a Leading Plaintiff Class Action Antitrust Firm in the United States** by the Legal 500 for the third year in a row.

In 2011, Partners Steven Toll, Joseph Sellers, and Daniel Sommers were selected as **Washington DC Super Lawyers**. Partner J. Douglas Richards, Of Counsel Joel Laitman and Christoper Lometti were selected as **New York - Metro Super Lawyers**. Partner Carol Gilden was selected as an **Illinois Super Lawyer**.

In 2011, Cohen Milstein was a recipient of The *National Law Journal's* **Pro Bono Award**. The Firm was named one of the "six firms that best reflect the pro bono tradition."

In 2010, Partner Joseph M. Sellers was selected as one of "**The Decade's Most Influential Lawyers**" by *The National Law Journal*.

In 2010, Partner Steven J. Toll was named one of Law360's "**Most Admired Attorneys**".

In 2010, Partner Andrew N. Friedman was selected as a **Washington DC Super Lawyer**.

In 2010, Partner Agnieszka M. Fryszman was selected as a finalist for the **Trial Lawyer of the Year Award** from the Public Justice Foundation.

In 2010, Partners Joseph M. Sellers and Agnieszka M. Fryszman were both selected as one of the **Lawdragon 500 Leading Lawyers in America**.

In 2010, Cohen Milstein was once again ranked as a **Leading Plaintiff Class Action Antitrust Firm in the United States** by the Legal 500.

In 2009, Partner Steven J. Toll was named a **Top Attorney in Corporate Litigation for Securities Litigation** by Super Lawyers.

In 2009, Partners Joseph M. Sellers and Christine E. Webber were named as **Top Washington Lawyers** by the Washingtonian Magazine.

In 2009, Cohen Milstein was recognized as **one of the top 50 law offices in Washington D.C. for diversity efforts**.

In 2009, Cohen Milstein was nominated for the prestigious **Class Action Law Firm of the Year** award by Global Pensions magazine for the third year in a row.

Cohen Milstein ranked as a **2009 Leading Plaintiff Class Action Antitrust Firm in the United States** by *The Legal500*.

The **2008 SCAS Report on Total Securities Class Action Settlements** ranked Cohen Milstein as a top firm for the second year in a row.

In 2008, Cohen Milstein was nominated for the prestigious **Class Action Law Firm of the Year** award by Global Pensions magazine for the second year in a row.

In 2008, Managing Partner Steven J. Toll was named one of Lawdragon's **100 Lawyers You Need to Know in Securities Litigation.**

Attorney Profiles – Partners

Steven J. Toll

Steven J. Toll is Managing Partner at Cohen Milstein, a member of the Executive Committee, and Co-Chair of the firm's Securities Fraud & Investor Protection practice group. In this role, Mr. Toll guides the firm's mediation efforts and strategy, and has been lead or principal counsel on some of the most high-profile stock fraud lawsuits in the past 30 years, arguing important matters before the highest courts in the land.

Mr. Toll has built a distinguished career and reputation as a fierce advocate of the rights of shareholders and has guided mediation efforts on the firm's largest and most important matters (both securities fraud and other consumer type cases), a role in which he has earned the trust of mediators, as well as the respect of defense counsel. Mr. Toll has been involved in settling some of the most important mortgage-backed securities (MBS) class-action lawsuits in the aftermath of the financial crisis, including: Countrywide Financial Corp., which settled for $500 million in 2013; Residential Accredited Loans Inc. (RALI), which settled for $335 million in 2014; and the Harborview MBS suit, which settled for $275 million. He also negotiated a $90 million settlement of a suit against MF Global.

Among Mr. Toll's current matters is the Harman class action suit, where Mr. Toll argued and won an important ruling from the U.S. Court of Appeals for the District of Columbia Circuit. The Circuit Court reinstated the suit against electronics maker Harman International Industries; the ruling is significant in that it places limits on the protection allowed by the safe harbor rule for forward-looking statements.

Currently, Mr. Toll is also co-lead counsel in the BP Securities class action securities fraud lawsuit that arose from the devastating Deepwater oil spill in the Gulf of Mexico. The Fifth Circuit Court of Appeals recently affirmed the certification of the class of investors alleged to have been injured by BP's misrepresenting the amount of oil spilling into the Gulf of Mexico, and thus minimizing the extent of the cost and financial impact to BP of the clean up and resulting damages.

Mr. Toll is co-lead counsel in the consumer class action suit against Lumber Liquidators, a lawsuit that alleges the nationwide retailer sold Chinese-made laminate flooring containing hazardous levels of the carcinogen formaldehyde while falsely labeling their products as meeting or exceeding California emissions standards, a story that was profiled twice on 60 Minutes in 2015.

Mr. Toll is also leading Cohen Milstein's efforts in a $400 million derivative shareholder suit brought against the directors and officers of Bank Leumi, an Israeli bank, asserting that bank officers violated their fiduciary duties in conspiring to aid American taxpayers in hiding income from the IRS.

Mr. Toll has provided a great deal of pro bono legal work during a career at Cohen Milstein that spans more than three decades. In addition, he has been an active supporter of Children's Hospital National Medical Center for decades, setting up an endowment in his daughter's name to help the Hospital's leukemia patients and their families (his daughter passed away from leukemia in 1987), plus more recently establishing regular programs for music and laughter for the children during their hospital stays. He and his family also founded Lolly's Locks, a nonprofit organization that provides high-quality wigs to women cancer patients suffering from hair loss as a side effect of chemotherapy. Lolly's Locks was established in memory of Mr. Toll's late wife, Lolly, who passed away in 2012, after a 15-month battle with cancer.

Mr. Toll is a graduate of the Wharton School of the University of Pennsylvania, earning a B.S. cum laude, and received his J.D. from Georgetown University Law Center, where he was Special Project Editor of The Tax Lawyer. His name has appeared regularly on Law360's annual lists of MVP's, Leading Attorneys, and Most Admired Attorneys.

Joseph M. Sellers

Joseph M. Sellers is a Partner at Cohen Milstein, Chair of the firm's Executive Committee and Chair of the Civil Rights & Employment Practice Group, a practice he founded. In a career spanning nearly four decades, Mr. Sellers has represented victims of discrimination and other illegal employment practices individually and through class actions. He brings to his practice a deep commitment and broad background in fighting discrimination in all its forms. That experience includes decades of representing clients in litigation to enforce their civil rights, participating in drafting and efforts to pass landmark civil rights legislation, testifying before Congress on various civil rights issues, training government lawyers on the trial of civil rights cases, teaching civil rights law at various law schools and lecturing extensively on civil rights and employment matters.

Mr. Sellers, who joined the firm in 1997, has been practicing civil rights law for more than 35 years, during which time he has represented individuals and classes of people who have been victims of civil rights violations or denied other rights in the workplace. He has tried to judgment before courts and juries several civil rights class actions and a number of individual cases and has argued more than 30 appeals in the federal and state appellate courts, including the United States Supreme Court. He has served as class counsel, and typically lead counsel, in more than 75 civil rights and employment class actions.

His clients have included persons denied the rights and opportunities of employment because of race, national origin, religion, age, disability and sex, including sexual orientation and identity. He has represented victims of race discrimination in the denial of equal access to credit, in the rates charged for insurance and in the equal access to health clubs, retail stores, restaurants and other public places. He has challenged housing discrimination on the basis of race and the denial of housing and public accommodations to people with disabilities.

Some of the noteworthy matters he has handled include: *Walmart v. Dukes* (U.S. S.Ct.), delivered argument on behalf of class of women who alleged sex discrimination in pay and promotions in case establishing new rules governing class certification; *Randolph v. Greentree Financial* (U.S. S.Ct.), delivered argument on behalf of consumer challenging enforcement of arbitration agreement in case establishing rules governing the enforceability of arbitration agreements; *Beck. v. Boeing Company* (W.D. Wash.), co-lead counsel on behalf of class of more than 28,000 women employees alleging sex discrimination in pay and overtime decisions; *Conway, et al. v. Deutsch* (E.D. Va.), co-lead counsel on behalf of class of female covert case officers at the CIA alleging sex discrimination in promotions and job assignments; *Johnson, et al. v. Freeh* (D.D.C.), co-lead counsel on behalf of class of African-American FBI special agents alleging racial discrimination in promotion and job assignments; *Keepseagle v. Veneman* (D.D.C.), lead counsel on behalf of class of Native American farmers and ranchers alleging denial of equal access to credit by USDA; *Neal v. Director, D.C Dept. of Corrections* (D.D.C.), co-lead counsel in which he tried first sexual harassment class action to a jury, on behalf of a class of women correctional employees and women and men subject to retaliation;*Doe v. D.C. Fire Department* (D.D.C.), in which he established after trial that an applicant with HIV could properly serve as a firefighter; *Floyd-Mayers v. American Cab Co.* (D.D.C.), in which he represented persons who alleged they were denied taxi service because of their race and the race of the residents at the location to which they asked to

be driven; and *Trotter, et al. v. Perdue Farms* (D. Del.), lead counsel on behalf of chicken processing workers alleging violations of federal wage and hour and employee benefits law.

Prior to joining Cohen Milstein, Mr. Sellers served for over 15 years as the Director of the Employment Discrimination Project of the Washington Lawyers' Committee for Civil Rights and Urban Affairs, an organization providing pro bono representation in a broad range of civil rights and related poverty issues. He was a member of the transition teams of Obama/Biden in 2008 and Clinton/Gore in 1992 and 1993, and served as a Co-Chair of the Special Committee on Race and Ethnicity of the D.C. Circuit Task Force on Gender, Race and Ethnic Bias to which he was appointed by the judges of the D.C. Circuit Court of Appeals and the U.S. District Court for the District of Columbia.

Throughout his career, Mr. Sellers has also been active in legislative matters. He helped to draft and worked for the passage of the Civil Rights Act of 1991, the Americans with Disabilities Act of 1990 and the Lily Ledbetter Fair Pay Restoration Act of 2009. He has testified more than 20 times before Committees of the United States Senate and House of Representatives on various civil rights and employment matters.

A teacher and mentor, Mr. Sellers has trained lawyers at the U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice on the trial of civil rights cases, and was an Adjunct Professor at the Washington College of Law at American University, where he taught Employment Discrimination law, and at the Georgetown University Law Center, where he taught Professional Responsibility. In addition, he has lectured extensively throughout the country on various civil rights and employment topics.

Mr. Sellers has been recognized as one of the top lawyers in Washington and as one of the top plaintiffs' employment lawyers in the U.S. In 2010, *The National Law Journal* named him one of "The Decade's Most Influential Lawyers," in 2011 *The Legal Times* named him a "Legal Visionary," and in 2012 the Washington Lawyers' Committee for Civil Rights and Urban Affairs awarded him the Wiley Branton Award for leadership in civil rights. He is a professionally trained mediator and has served as the President of the Washington Council of Lawyers.

Mr. Sellers received his B.A. in American History and Literature from Brown University, and earned his J.D. from Case Western Reserve School of Law, where he served as Research Editor of the *Case Western Reserve Law Review*.

Andrew N. Friedman

Andrew N. Friedman is a Partner at Cohen Milstein, and is Co-Chair of the firm's Consumer Protection practice group. Practicing in the class action field since 1985, Mr. Friedman specializes in litigating complex, multi-state class action lawsuits against manufacturers and consumer service providers such as banks, insurers, credit card companies and others. He is widely recognized as a leader in enforcing consumer rights and known as a hands-on lawyer who is ready to take litigation all the way through trial.

Over the years, Mr. Friedman has been lead or co-lead counsel in numerous important cases, bringing relief to millions of consumers and recovering hundreds of millions of dollars in class actions. He was one of the principal counsel in cases against Nationwide and Country Life, which asserted sales marketing abuses in the marketing of so-called "vanishing premium policies," where insurance agents sold insurance policies to unsuspecting consumers promising that after a relatively short time the dividends generated from the policy would be so high as to be able to fully pay the premiums. In fact, the calculations of the policies were based on unrealistic interest rate projections and, therefore, the premiums never "vanished." The Nationwide case

resulted in a settlement valued at between $85 million and $103 million, while a settlement with Country Life made $44 million in benefits available to policyholders.

Mr. Friedman was co-lead counsel in Keithly v. Intelius, Inc. (W.D. Wash.), where he negotiated two nationwide settlements with Intelius, Inc., relating to negative option programs and improper post-transaction marketing. The combined settlements made $12 million in cash and a total of $3.5 million in vouchers available to the Class.

Mr. Friedman has also litigated important consumer product lawsuits, including one against Thomson Consumer Electronics, which resulted in a settlement that made up to $100 million available for persons who paid for unreimbursed repairs to defective televisions. In addition, Mr. Friedman was one of the principal counsel in the Dex-Cool Litigation, a nationwide lawsuit alleging that General Motors sold millions of cars with defective coolant that gummed up and caused corrosion to engines. GM settled ahead of trial, offering relief of cash payments of up to $800 per repair.

More recently, Mr. Friedman litigated a lawsuit against Symantec, Corp., and Digital River, Inc., a four-year long nationwide class action battle regarding the marketing of a re-download service in conjunction with the sale of Norton software. The case settled in a $60 million all-cash deal one month before the case was about to go to trial – one of the most significant consumer settlements in years.

Prior to his current role as Co-Chair and member of the Consumer Protection group, Mr. Friedman was a member of the Securities Litigation & Investor Protection practice, litigating many important matters, including the Globalstar Securities Litigation in which he served as one of the lead trial counsel. The case settled for $20 million during the second week of the trial. In addition, Mr. Friedman served as one of co-lead or principal counsel in Norman Frank et al. v. David L. Paul (a recovery of over $18 million); In re Jiffy Lube Securities Litigation (D. Md.) (a recovery of over $12 million); and In re Immunex Securities Litigation (W.D. Wash.) (a recovery of $14 million).

Currently, Mr. Friedman is litigating such notable matters as:

- Anthem Data Breach Litigation: Mr. Friedman is co-lead counsel in a high-profile class action lawsuit against Anthem Inc. over its massive data breach that compromised the personal identification (including social security numbers, date of birth, medical ID number, etc.) and health information of 80 million insured customers. The lawsuit alleges Anthem, the second-largest insurance company in the nation, failed to ensure its data systems were protected, failed to prevent and stop the breach from happening and failed to disclose to its customers material facts regarding the breach. Mr. Friedman is involved in all aspects of the litigation.

- Sallie Mae Litigation: Cohen Milstein is co-lead counsel in a series of cases alleging that Sallie Mae charged usurious interest rates and improper late fees to California students. Mr. Friedman is overseeing all aspects of the litigation.

- Home Depot Data Breach Litigation: Mr. Friedman is a member of the Plaintiffs' Steering Committee representing financial institutions and heads the expert committee in a class action lawsuit arising out of the Home Depot data breach, a cyber attack that affected hundreds of financial institutions and more than 40 million consumers.

Mr. Friedman is a noted speaker who has appeared on numerous panels for legal education seminars and institutional investor conferences on the issues of consumer and securities class actions. In 2011, LawDragon named him one of the Leading Plaintiffs' Lawyers. His work has been cited in the media and he was profiled in the April 14, 2000, Washington Business Journal.

Prior to joining Cohen Milstein, Mr. Friedman served as an attorney with the U.S. Patent and Trademark Office.

Mr. Friedman attended Tufts University, graduating magna cum laude and was elected Phi Beta Kappa, with a B.A. in Psychology. He earned his J.D. from the National Law Center, George Washington University.

Daniel S. Sommers

Daniel S. Sommers is a Partner at Cohen Milstein, a member of the firm's Executive Committee and Co-Chair of the Securities Litigation & Investor Protection practice group. During his nearly three decade career at Cohen Milstein, Mr. Sommers has taken leadership roles in litigating large, complex and significant securities cases. He provides litigation counsel to the firm's institutional investor clients, including for example, the New York State Common Retirement Fund, the Ohio Public Employees Retirement System, the State Teachers Retirement System of Ohio, the Arkansas Public Employees Retirement System and numerous Taft-Hartley pension funds. Many of his cases have resulted in important rulings and legal precedents, as well as in significant recoveries for investors totaling hundreds of millions of dollars. Some of his notable matters include:

- *Bear Stearns Mortgage Pass Through Securities Litigation*: Co-lead counsel in a $505 million landmark settlement (including a $5 million expense fund) of a securities class action suit alleging that Bear Stearns violated securities laws in the sale of mortgage backed securities to investors. This case represents the largest recovery ever obtained in a securities class action on behalf of investors in mortgage-backed securities.
- *Converium/Scor Securities Litigation* (Netherlands): Co-lead counsel in a groundbreaking $58.4 million securities class action recovery, in which the Amsterdam Court of Appeal declared binding a world-wide class action settlement of claims of non-U.S. investors who purchased Converium shares outside of the United States. The ruling was a major victory for worldwide investors because it successfully implemented the Dutch Collective Settlement Statute even though the underlying transactions had limited contact with the Netherlands.
- *Fannie Mae Securities Litigation*: Played a significant role in a high profile securities class action against Fannie Mae, several of its former executives and KPMG involving allegations of falsified financial statements. The $153 million settlement amount represents the largest recovery in a securities fraud class action ever obtained in the United States District Court for the District of Columbia.
- *CP Ships Ltd. Securities Litigation*: Co-lead counsel in a class action lawsuit alleging that CP Ships, a Canadian company headquartered in England but with substantial operations in Tampa, Florida, issued false financial statements. Mr. Sommers argued an appeal in the U.S. Court of Appeals for the Eleventh Circuit, successfully opposing objections to a settlement that provided non-U.S. investors with the protections of the federal securities laws.
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Mr. Sommers has obtained significant recoveries for investors in numerous other securities class action cases in federal courts throughout the United States including: *Steiner v. Southmark Corporation* (N.D. Tex.) (over $70 million recovery); *In re PictureTel Inc. Securities Litigation* (D. Mass.) ($12 million recovery); *In re Physician*

Corporation of America Securities Litigation (S.D. Fla.) ($10.2 million recovery); *In re Gilat Satellite Securities Litigation* (E.D.N.Y.) ($20 million recovery); *In re Pozen Inc. Securities Litigation* (M.D.N.C.) ($11.2 million recovery); *In re Nextel Communications Securities Litigation* (D.N.J.) (up to $27 million recovery); *In re PSINet Inc. Securities Litigation* (E.D. Va.) ($17.8 million recovery); *In re Cascade International Inc. Securities Litigation*, (S.D. Fla.) (global recovery of approximately $10 million); *In re GT Solar Securities Litigation* (D.N.H.) (recovery of $10.5 million);*Mulligan v. Impax Laboratories, Inc.* (E.D. Va.) (recovery of $8 million); *Plumbers & Pipefitters National Pension Fund v. Orthofix, N.V.* (S.D.N.Y) (recovery of $11 million) and *In re ECI Telecom Securities Ltd. Litigation* (E.D. Va.) ($21.75 million recovery). He has also handled significant appellate matters including arguing before the United States Court of Appeals for the Ninth Circuit in *Hemmer Group v. Southwest Water Company*, where he obtained a reversal of the district court's order dismissing investors' claims under the Securities Act of 1933. In addition, he was co-lead counsel for investors before the United States Supreme Court in *Broudo v. Dura Pharmaceuticals, Inc*., 544 U.S. 336 (2005) (addressing the standards for pleading loss causation).

Mr. Sommers is also experienced in non-class action litigation. He represented TBG Inc., a multi-billion dollar privately-held overseas corporation, in a multi-party, complex action alleging fraud in a corporate acquisition and represented individuals in connection with investigations brought by the United States Securities and Exchange Commission. He also has represented publicly traded corporations in the prosecution and defense of claims. Mr. Sommers has litigated cases covering a wide-range of industries including the financial services, computer software, pharmaceutical, insurance, real estate and telecommunications industries among others. In addition, he has substantial experience in cases presenting complex accounting and auditing issues.

Mr. Sommers is recognized as a thought leader on the subjects of securities and class action litigation and is a frequent speaker on those topics both to other lawyers and institutional investors. He has been quoted on these topics in a variety of publications, such as *The Wall Street Journal*, *The Washington Post*, *BNA/Bloomberg*, and *Law360*. Mr. Sommers is a member of the advisory board of the *Bloomberg/BNA Securities Litigation & Law Report* and served on Law360's Securities Editorial Advisory Board. *Benchmark Plaintiff* has recognized him as a litigation star in multiple years. He has been named a Washington, D.C. Super Lawyer each year from 2011 through 2016, and has been awarded Martindale-Hubbell's highest rating of AV Preeminent®. He served as Chairman and Vice-Chairman of the Investor Rights Committee of the Corporation, Finance and Securities Law Section, District of Columbia Bar, and through the years has been a guest lecturer at Columbus School of Law at the Catholic University of America; Georgetown Law Center; and George Washington University Law School.

Mr. Sommers attended Union College, where he earned a B.A. *magna cum laude* in Political Science, and graduated from George Washington University Law School.

Daniel A. Small

Daniel A. Small has been a Partner at Cohen Milstein for more than 20 years and chaired or co-chaired the firm's Antitrust practice group from 2008 to 2014. He is a member of the firm's Executive Committee.

When he arrived at Cohen Milstein 26 years ago, Mr. Small was assigned to work on securities fraud cases. One year later, he received an assignment in an antitrust case and has worked virtually full time on antitrust cases ever since. He has represented plaintiff classes as lead or co-lead counsel numerous times and has tried cases before juries and has argued cases in several appellate courts, including the United States Supreme

Court. He also has defended unions against antitrust claims and represented a key duplication machine manufacturer on its monopolization claims against the dominant competitor.

Mr. Small has obtained favorable settlements and judgments totaling hundreds of millions of dollars and has been involved with a broad array of markets, everything from computer software and hardware to wild blueberries and hospital nurses. He has developed a sophisticated understanding of how conspiracies and monopolies operate in a range of complex markets. He has spent years studying the economic issues that underpin his cases, and the challenges of using antitrust litigation to achieve just compensation for victims, and to encourage and facilitate freer and more open markets in this country.

His work in complex civil litigation has made him one of the most respected and feared litigants in the class action antitrust space: *The Legal 500* has recognized Mr. Small and Cohen Milstein as a "Leading Plaintiffs Antitrust Class Action Lawyer/Firm" annually since 2009; *Benchmark Plaintiff* has repeatedly awarded him "National Litigation Star – Antitrust"; and in 2014, he was named a "Leading Competition Lawyer" by the *International Who's Who of Competition Lawyers & Economists*.

Currently, Mr. Small is litigating the following notable matters, among others:

- VFX/Animation Workers Litigation: Cohen Milstein is one of three court-appointed co-lead firms in litigation alleging that the major animation studios conspired to suppress the pay of special effects and animation workers. The litigation has survived a motion to dismiss and the plaintiffs recently filed a motion for class certification.
- Prime Healthcare Services Litigation: Cohen Milstein is defending the Service Employees International Union (SEIU) in an antitrust conspiracy action brought by Prime Healthcare Services, a hospital chain in Southern California, alleging that SEIU conspired with Kaiser Permanente to drive Prime and certain other hospitals out of the market. Cohen Milstein led the successful effort to have the complaint and amended complaint dismissed in the Southern District of California. The case is on appeal in the Ninth Circuit where Mr. Small recently argued on behalf of the SEIU and its local union, UHW.
- Google Wi-Fi Litigation: Cohen Milstein is co-lead counsel in a nationwide class action lawsuit alleging Google violated the Wiretap Act when its Street View vehicles collected payload data from unencrypted Wi-Fi networks, including the home networks of individuals. The litigation survived a motion to dismiss, which was affirmed on an interlocutory appeal to the Ninth Circuit. Currently, the firm is in the midst of jurisdictional discovery.
- Michigan Blue Cross Litigation: Cohen Milstein is co-lead counsel in this class action challenging Michigan Blue Cross's use of most favored nation provisions in its provider agreements with hospitals in Michigan. The class plaintiffs secured a $30 million settlement, which was approved by the United States District Court for the Eastern District of Michigan. Mr. Small defended the settlement on appeal, arguing recently before the Sixth Circuit Court of Appeals.
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Past successes include:

- In re Buspirone Antitrust Litigation: $90 million settlement. Cohen Milstein served as co-lead counsel in a class action lawsuit alleging that Bristol Myers-Squibb Co., the manufacturer of the prescription drug Buspar, conspired to keep generic versions of the drug out of the market.
- *Pease v. Jasper Wyman & Son, et al.:* $56 million judgment. Cohen Milstein was lead counsel representing a class of wild blueberry growers in Maine who sued four blueberry processors for

conspiring to depress blueberry prices. The litigation was tried before a jury in Maine state court, where Mr. Small was co-lead trial counsel. The jury found the processors liable for 100% of the damages estimated by the plaintiffs' expert and awarded the growers $18.68 million in damages, which was trebled under Maine antitrust law.

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Mr. Small attended Colgate University, where he graduated with a B.A., *cum laude*, in History. He earned his J.D. at American University's Washington College of Law. Following law school, Mr. Small clerked for the Honorable Judge Roger Vinson, United States District Court for the Northern District of Florida, from 1986 to 1988. He serves on the Advisory Board of the American Antitrust Institute and is chair of the selection committee for the annual Jerry S. Cohen Memorial Writing Award for Antitrust Scholarship.

Christine E. Webber

Christine E. Webber is a Partner at Cohen Milstein, and a member of the Civil Rights & Employment practice group. In that role, Ms. Webber represents victims of discrimination and other illegal employment practices in class and collective actions. She has participated during her career in litigating groundbreaking sex discrimination lawsuits. Ms. Webber is a hands-on litigator, known for her ability to work closely with economic and statistical expert witnesses and to identify the types of sophisticated statistical analyses that will be most helpful to her clients' claims.

Ms. Webber is a tenacious and resourceful litigator with a fierce commitment to fighting discrimination and protecting workers. In the face of adversity she continues to find new ways to protect her clients' rights. Following the Supreme Court's ruling decertifying the class in *Dukes v. Wal-Mart*—a case brought on behalf of a nationwide class of women suing Wal-Mart for sex discrimination in pay and promotion—Ms. Webber has been counsel in several regional class cases pursuing these claims for former Dukes class members. Ms. Webber was co-lead counsel in*Rindfleisch v. Gentiva Health Services* (N.D. Ga.) in which nurses and other home health care providers were held to be non-exempt because they were not paid on a bona fide salaried or fee basis. Following this successful summary judgment ruling, the case was decertified, and Ms. Webber continues to represent individuals seeking their unpaid overtime. In *Tomkins v. Amedisys, Inc.,* a lawsuit challenging similar practices as the Gentiva litigation, Ms. Webber represented approximately 2,000 nurses, physical therapists and occupational therapists pursuing wage and hour claims against Amedisys; the case settled recently for $8 million.

Ms. Webber's past successes include *In re Tyson Foods FLSA MDL* (M.D. Ga.), a collective action involving Fair Labor Standards Act (FLSA) claims at over 40 Tyson chicken processing plants, which ultimately resolved the claims of 17,000 chicken processing workers who had been denied compensation for donning and doffing required safety and sanitary equipment. In *Hnot v. Willis Group Insurance* (S.D.N.Y.), Ms. Webber represented a class of women vice presidents in Willis' Northeast region, who complained of discrimination with respect to their salary and bonuses. This "glass ceiling" case settled in 2007 for $8.5 million plus attorneys' fees, an average payment of $50,000 per woman. A subsequent case, *Cronas v. Willis Group*, pursued similar claims for a later time period with similar success. Ms. Webber was also counsel to the plaintiff class in *Keepseagle v. Vilsack*, a historic settlement between Native American farmers and the United States Department of Agriculture (USDA). The *Keepseagle* settlement agreement required the USDA to pay $680 million in damages to thousands of Native Americans, to forgive up to $80 million in outstanding farm loan debt and to improve the farm loan services the USDA provides to Native Americans. Ms. Webber was part of the team recognized by Public Justice as finalists for their Trial Lawyer of the Year award in 2011 for the work done in *Keepseagle*.

Prior to joining Cohen Milstein in 1997, Ms. Webber received a Women's Law and Public Policy fellowship which funded the first of her four years at the Washington Lawyers' Committee for Civil Rights and Urban Affairs in their Equal Employment Opportunity Project. There, she worked on employment discrimination cases, focusing in particular on the sexual harassment class action *Neal v. Director, D.C. Department of Corrections, et al.* Ms. Webber participated in the trial of this groundbreaking sexual harassment class action in 1995. Ms. Webber also tried the race discrimination case *Cooper v. Paychex* (E.D. Va.), and successfully defended the plaintiffs' verdict before the Fourth Circuit.

Ms. Webber is co-chair of the National Employment Lawyers' Association's Class Action Committee, a position she has held since 1999. She speaks and writes frequently on employment discrimination, wage and hour issues, and class actions.

Ms. Webber attended Harvard University, graduating *magna cum laude*, with an A.B. in Government, and earned her J.D., *magna cum laude*, Order of the Coif, at the University of Michigan Law School. Following law school, she clerked for the Honorable Hubert L. Will, United States District Judge for the Northern District of Illinois.

Richard A. Koffman

Richard A. Koffman is a Partner at Cohen Milstein and Co-Chair of the Antitrust practice group. He litigates antitrust cases on behalf of the victims of corporations engaged in price-fixing, market monopolization, and other unlawful conduct. Mr. Koffman joined Cohen Milstein after serving as Senior Trial Attorney in the U.S. Department of Justice's Antitrust and Civil Rights Divisions. He views his role in litigating antitrust suits as an extension of the public interest work he pursued at the DOJ in promoting competition and fighting discrimination.

Mr. Koffman has served as lead or co-lead counsel in many landmark antitrust class actions, including:

- Urethanes (Polyether Polyols) Antitrust Litigation: Co-lead counsel for plaintiffs in an antitrust class action alleging a conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants settled pre-trial for a total of $139 million. After a four-week trial, the jury returned a $400 million verdict for plaintiffs against the final defendant, The Dow Chemical Co., which the district court trebled to more than $1 billion. Dow ultimately settled for $835 million while the case was on appeal, bringing the total recovery to $974 million – nearly 250% of the damages found by the jury.
- Plasma-Derivative Protein Therapies Antitrust Litigation: Co-lead counsel for plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin – life-saving therapies derived from blood plasma. Mr. Koffman and his team obtained settlements totaling $128 million to compensate customers who were overcharged for these vital therapies.
- Polyester Staple Antitrust Litigation: Co-lead counsel for plaintiffs alleging a conspiracy to fix prices for polyester staple fiber; the case settled for $46 million.

Current cases include:

- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company – the three largest dental

supply and dental equipment distributors in the United States – fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays.

- Sports Broadcasting Antitrust Litigation: Counsel for plaintiffs in class actions alleging that the system of geographical broadcasting territories employed by Major League Baseball and the National Hockey League amount to unlawful market allocation under Section 1 of the Sherman Act.
- Mixed Martial Arts (MMA) Antitrust Litigation: Co-lead counsel in a class action on behalf of elite MMA fighters alleging that Zuffa LLC – commonly known as the Ultimate Fighting Championship – has unlawfully monopolized the markets for promoting live professional MMA bouts and for purchasing the services of elite professional MMA fighters. The district court denied defendant's motion to dismiss the case in September 2015.
- *People of the State of California v. American Express:* Counsel for the City of San Francisco in litigation alleging that American Express, by prohibiting its participating merchants from encouraging consumers' use of less costly payment methods (including debit cards and cash), is responsible for unlawful overcharges borne by retailers and, indirectly, all California consumers.

The Legal 500 has recognized Mr. Koffman as a Leading Lawyer for "Litigation - Mass Tort and Class Action: Plaintiff Representation - Antitrust" for five years in a row, describing him as a "strong brief writer and an excellent oral advocate." Mr. Koffman was also named as one of the world's leading competition lawyers by Global Competition Review in the U.S. Plaintiffs section of *Who's Who Legal: Competition 2016*.

Mr. Koffman attended Wesleyan University, where he received a B.A. with honors, and is a graduate of Yale Law School, where he was Senior Editor of the *Yale Law Journal*. After law school, Mr. Koffman served as a law clerk to two Federal Judges: James B. McMillan, of the U.S. District Court for the Western District of North Carolina and Anthony J. Scirica of the U.S. Court of Appeals for the Third Circuit.

Agnieszka Fryszman

Agnieszka Fryszman is a Partner at Cohen Milstein, and is Chair of the firm's Human Rights practice group. She has been recognized as leading one of the best private international human rights practices in the world.

Ms. Fryzman represents individuals who have been victims of torture, human trafficking, forced and slave labor and other violations of international law. A recognized expert and leader in the field of human rights law, Ms. Fryszman regularly litigates cases against corporate giants. She was a member of the legal team that successfully represented survivors of Nazi-era forced and slave labor against the German and Austrian companies that allegedly profited from their labor. These cases were resolved by international negotiations that resulted in multi-billion dollar settlements. She also represented, pro bono, Holocaust survivors suing Swiss banks that collaborated with the Nazi regime during World War II. This litigation led academics to revise their assessment of Switzerland's relationship with Nazi Germany and exposed the extent of business participation in the Holocaust.

Ms. Fryszman earned the *National Law Journal* Pro Bono Award for efforts on behalf of Nepali laborers injured or killed at U.S. military bases in Iraq and Afghanistan. Her team obtained several judgments and significant settlements on behalf of the families.

In addition, she currently represents victims of a human trafficking ring that allegedly lured men from Nepal with the promise of employment at luxury hotels, but instead took them against their will to work for U.S. military contractors in Iraq. Ms. Fryszman investigated and initiated suit against military contractor KBR, filing one of the first complaints under the Trafficking Victims Protection Act. She has also represented men and women who were trafficked by diplomats, in the fishing industry, and to work cleaning houses in Northern Virginia. In one recent case, after Ms. Fryszman obtained a full recovery for her client in a civil suit, the Department of Justice brought criminal charges, resulting in guilty pleas by the perpetrators. Her work on behalf of the former "comfort women," women and girls trafficked into sexual slavery by the government of Japan during World War II, was recognized with the "Fierce Sister" award from the National Asian Pacific American Women's Forum.

Ms. Fryszman represented, pro bono, victims of the September 11 attack on the Pentagon and obtained one of the highest awards for an injured survivor from the Victim's Compensation Fund. Ms. Fryszman also represented, pro bono, two individuals detained by the United States at Guantanamo Bay who were ultimately cleared without charge.

Prior to joining Cohen Milstein in 1998, Ms. Fryszman served as counsel to the United States House of Representatives Committee on the Judiciary, Subcommittee on Commercial and Administrative Law, and before that counsel to Representative Henry Waxman, Ranking Member on the House Government Reform and Oversight Committee. Earlier in her career, she was legislative director to U.S. Representative Jack Reed.
Ms. Fryszman has received some of the legal profession's highest honors. Since 2009, LawDragon 500 has named her perennially to its list of Leading Lawyers in America. *Benchmark Plaintiff* has named her a Leading Star Plaintiffs' Litigator and one of the Top 150 Women in Litigation. For her pro bono work, she was awarded the Beacon of Justice Award by the National Legal Aid and Defender Association and the Frederick Douglass Human Rights Award from the Southern Center for Human Rights. She was also a finalist for the Public Justice Foundation's Trial Lawyer of the Year Award for her work on *Wiwa v. Royal Dutch Shell*. Ms. Fryszman joined the legal team in that case to prepare it for trial, resulting in a multi-million dollar settlement on the morning of jury selection.

Ms. Fryszman graduated from Brown University with an A.B. in International Relations, and earned her law degree from Georgetown University, graduating *magna cum laude*, Order of the Coif. At law school, she was a Public Interest Law Scholar.

Julie Goldsmith Reiser

Julie Goldsmith Reiser is a Partner at Cohen Milstein, and a member of the Securities Litigation Investor Protection Practice Group. Ms. Reiser's practice focuses on representing public pension plans and other institutional investors in high-stakes securities litigation.

Known for her hands-on approach, strong advocacy and critical thinking, Ms. Reiser has led successful litigation teams in several complex actions, including a $500 million settlement related to Countrywide's issuance of mortgage-backed securities ("MBS") and the recent Fifth Circuit affirmation of an investor class in

the BP securities fraud litigation stemming from the 2010 Deepwater Horizon oil spill. In those cases, Ms. Reiser's clients have benefited from her oral and written advocacy, her judgment, and her ability to work tirelessly and collegially as a member of a litigation team. Over the years, Ms. Reiser has become a recognized leader in the securities plaintiffs' bar, demonstrating a keen understanding of complex financial and economic issues and using her intuition and strategic thinking to develop strong legal theories that align with the evidence.

Currently, Ms. Reiser is litigating the following notable matters:

In re BP Securities Litigation: Ms. Reiser represents the New York State Common Retirement Fund as co-lead plaintiff in a securities class action filed in 2010, alleging that BP injured investors by intentionally downplaying the severity of the Deepwater Horizon oil spill and preventing investors from learning the magnitude of the disaster. Ms. Reiser has taken the lead in all aspects of this litigation: case development, motion practice, oversight and implementation of discovery strategies, depositions, expert discovery and argument. After successfully arguing for class certification to the district court, Ms. Reiser presented plaintiffs' defense of that court's decision to the Fifth Circuit U.S. Court of Appeals, which affirmed the class. Trial in this matter is set for July 2016.

Countrywide Mortgage Backed Securities Litigation: Ms. Reiser represented the Iowa, Oregon and Orange County public retirement systems in class action litigation related to Countrywide's issuance of mortgage-backed securities, which culminated in a landmark $500 million settlement. Over the course of the litigation, Ms. Reiser argued on investors' behalf at the motion to dismiss stage. She also handled various arguments related to discovery disputes, and oversaw merits and expert discovery. She took a majority of the fact depositions and was recognized for having teased a number of salient points from witnesses during the depositions. Ms. Reiser also took the lead in working with experts to maximize damages. The case is ongoing.

Ms. Reiser's successes include:

Policemen's Annuity and Benefit Fund of the City of Chicago, et al. v. Bank of America, NA, et al.: Ms. Reiser developed and litigated this novel class action, challenging trustee inaction in preventing investor losses. She represented the Arkansas Public Employees Retirement System, IPERS and Chicago Laborers in the case, which settled for $69 million. Ms. Reiser worked with plaintiffs' statistician to develop a sampling methodology for testing whether mortgages were underwritten properly and with plaintiffs' economist in the bid for class certification and approach to damages. At the final hearing, Judge Katherine B. Forrest commended the investors' legal team: "This is a very, very good result for the plaintiffs … [and] is something of which plaintiff counsel can be proud."

In re SCOR Holding (Switzerland) Securities Litigation: Ms. Reiser served as co-lead counsel in this landmark ruling, which was the first trans-Atlantic resolution of a U.S. securities class action in a Dutch court. The ruling made it easier for U.S. and European investors to use Dutch law in the future to protect their interests. Ms. Reiser helped secure a $140 million settlement.

In re Parmalat Securities Litigation: Ms. Reiser acted as co-lead counsel representing investors in the largest fraud in European corporate history. Ms. Reiser secured a $90 million settlement.

In addition, Ms. Reiser has represented plaintiffs in employment cases. In Wade v. Kroger (W.D. Ky.), she represented African American employees who received a $16 million settlement to resolve claims that the retailer Kroger had discriminated against them in pay and promotions. She was also involved in Beck v. The Boeing Co. (W. D. Wash.), a case alleging sex discrimination in compensation and promotions that settled for $72.5 million.

Ms. Reiser is a noted speaker, often called on to discuss important issues such as the class standing doctrine. Ms. Reiser is the author of "Pre-Dispute Arbitration Clauses: Taking the Alternative Out of Dispute Resolution," Bloomberg BNA, Class Action Litigation Report, December 11, 2015. After its publication, Paul Bland, Executive Director of Public Justice wrote: "This is invaluable advocacy that takes industry-side advocacy and exposes its flaws and failings. I'm very glad to see this kind of very high quality advocacy and critical thinking."

Ms. Reiser also is the co-author of "Omnicare: Negligence is the New Strict Liability When Pleading Omissions Under the Securities Act," Bloomberg BNA, Corporate Law & Accountability Report, April 10, 2015; the author of "Dodd Frank's Protections for Senior Citizens: An Important, Yet Insufficient Step," University of Cincinnati Law Review, Volume 81, Issue 2, May 30, 2013; "Why Courts Should Favor Certification of MBS Actions," ABA Securities Litigation Journal, Volume 22, Number 1, Fall 2011; and the co-author of "The Misapplication of American Pipe Tolling Principles," ABA Securities Litigation Journal, Volume 21, Number 2, Winter 2011. She also co-authored Opt-Outs: Making Private Enforcement of the Securities Laws Even Better, featured in the Winter/Spring 2008 edition of the ABA's Class Action and Derivative Suit Committee Newsletter and Companies in the Cross Hairs: When Plaintiffs Lawyers Choose Their Targets, They Look for These Employment Practices, The Legal Times, February 21, 2005.

Ms. Reiser attended Vassar College, graduating with honors, and earned her J.D. at the University of Virginia School of Law. She has served as a board member at Seattle Works and the Pacific Northwest Ballet.

Theodore J. Leopold

Theodore J. Leopold is a Partner at Cohen Milstein, and a member of the firm's Executive Committee. Mr. Leopold, who joined the Firm in 2014, is Chair of the Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practices and Co-Chair of the Consumer Protection practice.

Mr. Leopold's practice is devoted solely to trial work, with a focus on complex product liability, managed care abuse, consumer class actions and catastrophic injury and wrongful death litigation. Mr. Leopold has tried cases throughout the country and has recovered multi-million dollar verdicts, including jury verdicts in the eight-figure and nine-figure amounts.

In his role, Mr. Leopold litigates high-stakes, complex lawsuits on behalf of consumer safety issues, particularly as it relates to product defects, automobile safety and managed care matters. In 2010, he obtained a $131 million jury verdict against the Ford Motor Company, the ninth-largest verdict against an automobile company in U.S. history.

Mr. Leopold was on the steering committee in the National Managed Care Class Action and the Plaintiffs' settlement committee for the Ford/Firestone National Class Action. Currently, he serves on the Plaintiffs' trial team in the Rail Freight Fuel Surcharge Antitrust Litigation, as lead counsel in the HCA Class Action and as co-lead counsel in the Red Light Class Action.

Currently, Mr. Leopold is litigating the following notable matters:

- HCA: Mr. Leopold is lead counsel in a class action lawsuit alleging that two Florida women and others like them were billed inflated and exorbitant fees for emergency radiology services covered in part by their Florida Personal Injury Protection (PIP) insurance. Mr. Leopold is lead attorney in the litigation charging HCA hospitals with gouging patients with PIP coverage. The case is ongoing.
- United States of America, et al. v. AIDS Healthcare Foundation, Inc.*:* Mr. Leopold represents relators in a Qui Tam matter involving the anti-kickback statute. The lawsuit alleges that the AIDS Healthcare Foundation, the nation's largest provider of HIV/AIDS medical care, improperly payed illegal kickbacks for patient referrals, and then fraudulently billed government healthcare programs. The case is ongoing.
- *Carrier v. Trinity:* Mr. Leopold represents the Carrier family in this wrongful death matter. The death occurred as a result of the guardrail safety device failing. Instead of protecting the driver, the guardrail intruded into the passenger compartment of the vehicle and impaling the driver, causing her death. The case is ongoing.

Examples of some of Mr. Leopold's litigation successes are:

- *Mincey v. Takata:* Mr. Leopold was the lead attorney in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic when the driver's side airbag deployed too aggressively during a vehicle collision. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia. The suit charged that the Takata Corporation, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by Mr. Leopold showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016.
- Caterpillar Antitrust Litigation: Mr. Leopold was co-lead counsel in a class action lawsuit alleging Caterpillar sold diesel engines with defective exhaust emissions system that resulted in power losses and shutdowns. Mr. Leopold developed the case and led all aspects of the litigation.
- *Cole v. Ford Co.:* Mr. Leopold was co-trial attorney for the family of former New York Mets infielder Brian Cole who was killed when the Ford Explorer he was in rolled over and he was ejected from his seat. The lawsuit charged that the defective seat belt in his Ford Explorer failed to keep him in his seat. Following a trial jury the jury found for the Cole family in the amount of $131 million.
- *Quinlan v. Toyota Motor Corporation:* Mr. Leopold was lead counsel in a product liability case filed against Toyota Motor, alleging that manufacturing defects in the defendant's car caused the car being driven by the plaintiff Quinlan to suddenly accelerate and go out of control, resulting in catastrophic injuries that left him a quadriplegic. The defendant entered into a settlement, which is confidential.
- *Chipps v. Humana:* Mr. Leopold tried one of the first managed care cases in the country. The case involved the wrongful denial of physical and occupational therapy for a 6 year old child with cerebral palsy. The jury returned the largest punitive damage award on behalf of an individual in Florida history.
- *Salvato v. Marion County Sherriff:* Mr. Leopold represented the Salvato family in the wrongful death case of Joshua Salvato, an unarmed 21-year-old, who was shot and killed by two Marion County Sherriff's deputies in 2014. The jury verdict returned restitution in the amount of $2.3 million, charging one deputy with excess force and the other for willfully inflicting suffering on Mr. Salvato.

Mr. Leopold is the past president of Public Justice, a national organization headquartered in Washington, D.C. that fights for justice through precedent-setting and socially significant individual and class action litigation. He is consistently recognized by leading publications such as *Super Lawyers* and *The Best Lawyers in America*. In addition, he has been nominated for "Trial Lawyer of the Year" by the Public Justice Foundation for his ground breaking litigation involving the managed care industry, and his work has been featured in the National Law Journal's "Top Verdicts of the Year."

Mr. Leopold lectures frequently at professional gatherings on such issues as personal injury, product liability, class action litigation, trial tactics and consumer justice. He is also author and co-author of several legal publications, including Florida Insurance Law and Practice (Thomson/West). Additionally, Mr. Leopold has earned the Florida Bar Civil Trial Certification, the highest level of recognition by the Florida Bar for competency and experience within civil trial law.

Mr. Leopold is a graduate of University of Miami, where he received a B.A., and earned his J.D. from Cumberland School of Law, Samford University.

Carol V. Gilden

Carol V. Gilden is a Partner in the Securities Litigation & Investor Protection Practice Group at Cohen Milstein. She represents public pension funds, Taft-Hartley pension and health and welfare funds, and other institutional investors in securities class actions, transaction and derivative litigation, and individual actions, as well as in foreign securities litigation. She also litigates other types of complex litigation matters and class action cases in state and federal courts nationwide.

Ms. Gilden began her career at the Securities and Exchange Commission (SEC), in the Enforcement Division, spending five years investigating and litigating cases involving securities fraud. Prior to joining Cohen Milstein in 2007, Ms. Gilden served as the head of the securities class action practice at a prominent mid-sized Chicago law firm and the vice chair of its class action department. Ms. Gilden's guiding principle is that those who commit fraud on the financial markets should be held accountable. She is a strong advocate for investors and pension funds who have been defrauded by deceptive practices that permeate the financial markets. Her special focus is on complex litigation calling for strategic thinking, tenacity and the ability to persevere through the many stages of litigation. Over the course of her 30-year career in the profession, she has successfully litigated and worked on cases that have resulted in aggregate recoveries in excess of several billion dollars for investors.

Ms. Gilden is an accomplished litigator, with extensive experience handling all phases in a case, including investigative, motion practice (lead plaintiff motions, motions to dismiss, class certification and summary judgment), discovery (fact and expert), oral argument, appeal, and settlement negotiations. She has been lead and co-lead counsel in many notable matters, including the *MF Global* litigation ($90 million settlement), a precedent–setting case in which the U.S. Court of Appeals for the Second Circuit sided with the plaintiffs and held that companies cannot make false or misleading statements in their offering documents, and then hide behind risk disclosures related to those facts in their attempt to escape liability. The National Law Journal singled out Ms. Gilden's work on the case in connection with its selection of Cohen Milstein as a Hot Plaintiffs' Firm for that year.

Another notable case in which Ms. Gilden served as lead counsel, the *IntraLinks* Litigation, was one of the first

securities class actions to be certified following the Supreme Court's decision in Halliburton II. That case was successfully resolved for $14 million. Other recent cases that she has led and which have been successfully resolved, include the *Huron* Securities Litigation ($40 million settlement, the *ITT Securities Litigation* ($16.96 million settlement) and In re RehabCare Group, Inc. Shareholders Litigation, where Ms. Gilden was co-lead counsel and settled the case for a cash payment to shareholders and significant deal reforms including enhanced disclosures and an amended merger agreement.

Ms. Gilden has been on the Executive Committee of other high-profile cases, including the Global Crossing Securities Litigation (settlements of $448 million) and the Merrill Lynch Analyst cases ($125 million settlement), as well as on the litigation team of the Waste Management Litigation ($220 million settlement). Under her leadership, her former firm was an active member of the litigation teams in the *AOL Time Warner Securities litigation* ($2.5 billion settlement), *CMS Securities Litigation* ($200 million settlement) and the *Salomon Analyst Litigation/In re AT&T* ($75 million settlement). Further, Ms. Gilden was lead counsel in an opt-out securities litigation action in connection with the McKesson/HBOC merger, *Pacha, et al. v. McKesson Corporation, et al.*, which settled for a substantial, confidential sum.

Ms. Gilden has earned the trust of her clients who know she will go to the mat for them, from start to finish in their cases. She draws respect from colleagues as well as adversaries who perennially have placed her in the highest ranks of the profession, including being named an Illinois Super Lawyer repeatedly over the last 10 years, "Pension Fund Attorney of the Year, Illinois" by the Global Corporate International Magazine in 2014 and 2015 and being recognized for Excellence in Law by the Worldwide Registry. She has been featured on the cover of the Chicago Lawyer in connection with a feature article on securities class actions. She is a much sought-after speaker at legal and pension fund conferences and has been frequently quoted in the national media on market scandals, recent developments and trends in securities law and high profile securities fraud cases.

Ms. Gilden is currently representing the Chicago Public School Teachers' Pension Fund, along with other institutions, in a high profile lawsuit charging 12 Wall Street banks with conspiring to engineer and maintain a collusive and anti-competitive stranglehold over the market for interest rate swaps in violation of the antitrust laws—an action that harms investors in one of the world's biggest financial markets. She also is representing the Cleveland Bakers and Teamsters Pension and Health and Welfare Funds and other institutions in another, high profile antitrust action alleging that two dozen financial institutions with an inside role at the auction for United States Treasuries conspired to manipulate yields and prices to their own benefit.

In addition, Ms. Gilden serves as co-lead counsel in *City of Chicago v. Hotels.com, et al*, a high-profile and much-watched lawsuit in Cook County Circuit Court, alleging that online travel companies, Expedia, Hotels.com, Orbitz, Priceline and Travelocity failed to properly remit hotel taxes to the City of Chicago for hotel bookings. Ms. Gilden has argued and won numerous motions at the trial level on behalf of the City of Chicago, including the parties' cross motions for summary judgment, which involved six days of argument on liability and another half day of argument on damages. Settlements have been obtained from three of the four defendant groups. A judgment has been entered in the case on behalf of the City of Chicago for approximately $29 million against the remaining defendant group, Expedia. The case is currently on appeal.

Ms. Gilden served as the first (and to this day, only) woman President of the National Association of Shareholder and Consumer Attorneys, the preeminent trade association for securities class action attorneys, as well as the organization's first woman Treasurer. As President of NASCAT, Ms. Gilden made repeated visits

to Capitol Hill advocating for strong investor protection. . She also engaged in outreach to the institutional investor community on needed reforms to reverse the erosion of investor rights. Under Ms. Gilden's leadership, NASCAT also filed amicus briefs in connection with major securities cases before the Supreme Court and other courts. Prior to becoming President, she served as the President-Elect. She continues to serve on NASCAT's Executive Committee.

Ms. Gilden was selected to serve on the Corporate Governance and Markets Advisory Councils to the Board of Directors for the Council for Institutional Investors (CII) during 2013-2015. CII is a nonprofit association of pension and other employee benefits funds, endowments and foundations and a voice for effective corporate governance and strong shareholder rights.

Ms. Gilden regularly lectures at legal conferences around the country on securities litigation and class action law, and is a frequent speaker at institutional investor conferences and symposiums regarding securities law developments, shareholder rights and regulatory reform. She has authored and co-authored numerous scholarly articles and course materials on securities fraud cases, class actions, derivative litigation and related topics.

Ms. Gilden attended the University of Illinois, earning a B.S. in Business Administration, and received her J.D. from Chicago-Kent College of Law, where she graduated with honors and was a member of the *Chicago-Kent Law Review*.

Kit A. Pierson

Kit A. Pierson is a Partner at Cohen Milstein and Co-chair of the firm's Antitrust Practice Group, as well as Co-Chair of the Pro Bono Committee. Under his leadership, the Legal 500 has recognized Cohen Milstein as a Leading Plaintiff Class Action Firm for seven years in a row and Law360 selected the Antitrust Practice Group as a Competition Law Practice Group of the Year in 2013 and 2014.

Mr. Pierson has served as lead or co-lead counsel in many antitrust cases on behalf of the victims of corporations engaged in price-fixing, market monopolization and other unlawful conduct. Prior to joining Cohen Milstein in 2009, Mr. Pierson spent more than 20 years primarily representing defendants in a broad range of complex matters. Some of the companies he represented included Microsoft Corp., 3M Corp. and other major corporations, national associations and individuals in class actions and other antitrust litigation. As a result of his experience as a defense lawyer, Mr. Pierson possesses deep insight into defense strategies, understands the dynamics of the other side and is someone who has earned the respect and credibility of opposing counsel.

Mr. Pierson is a hands-on litigator who has litigated and tried antitrust lawsuits and other complex civil cases in many jurisdictions, helping to win settlements and judgments cumulatively totaling more than $1.5 billion in the past several years. Currently, he is lead or co-lead counsel in many antitrust cases at the firm. Some of his current cases include:

- Domestic Drywall Litigation: Cohen Milstein is co-lead counsel in an antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices. Mr. Pierson is running the case for Cohen Milstein and in 2015 took the lead for the direct purchaser plaintiffs in arguing against the defendants' summary judgment motions (which were denied by the Court for four of the five

defendants). Settlements for $45 million were also reached with two other defendants. The case is ongoing.

- Ductile Iron Pipe Fittings Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs in a price-fixing case against the three largest manufacturers of ductile iron pipe fittings—McWane Inc., Sigma Corporation and Star Pipe Products—and a monopolization case against McWane for excluding significant competition in the domestic ductile iron pipe fittings market. Settlements of $9 million have been reached with two of the defendants, Sigma and Star. Currently, Mr. Pierson is directing the team of attorneys that is now taking and completing fact depositions. The litigation is ongoing.
- Cast Iron Soil Pipe & Fittings Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs against the two largest soil pipe and fittings manufacturers in the country (McWane Inc. and Charlotte Pipe & Foundry) and the trade association they control (Cast Iron Soil Pipe Institute) in a lawsuit alleging that the defendants engaged in a nationwide price-fixing conspiracy and other anticompetitive actions. Mr. Pierson is directing the litigation team, which is currently concluding fact discovery. The litigation is ongoing.

Mr. Pierson's successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants—Bayer, BASF, Huntsman and Lyondell—settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, in which Mr. Pierson was one of the trial lawyers for the class, the jury returned a $400 million verdict for the plaintiffs, which is trebled under federal antitrust law to more than $1 billion, the largest verdict in the country in 2013, as reported by the National Law Journal. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment, and the case against Dow Chemical was settled for $835 while the matter was pending before the United States Supreme Court (resulting in a total recovery of $974.5 million in the case).
- Community Health Care System Litigation: Cohen Milstein is co-counsel representing an emergency room doctor and nurse in a whistleblower lawsuit alleging Community Health Care System defrauded the federal government in connection with health care bills. Cohen Milstein was co-counsel representing an emergency room doctor and nurse who brought claims against CHC under the False Claims Act. Mr. Pierson led Cohen Milstein's team in the case, which was brought under the False Claims Act. The case was resolved for $94 million.
- Electronic Books Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that Apple and five of the leading U.S. publishers conspired to raise the retail prices of e-books. Mr. Pierson led the Cohen Milstein team, which secured class certification, defeated motions to exclude the class expert, and successfully moved for exclusion of most of Apple's expert testimony. The five publishing defendants settled for $166 million and a settlement was reached with Apple shortly before trial for an additional $450 million.
- Guantanamo Litigation: Mr. Pierson represented Alla Ali Bin Ali Ahmed, a young man who had been arrested with many others while residing in a house in Pakistan and was then incarcerated in Guantanamo without a judicial hearing for more than seven years. After filing a habeas corpus petition, Mr. Pierson represented Mr. Ahmed at a multi-day evidentiary hearing before a United States District Court judge. At the conclusion of the hearing, the District Court ruled that the evidentiary record did not support Mr. Ahmed's detention and ordered that he be released from Guantanamo and

returned to his home country.

Mr. Pierson was named one of the 500 leading lawyers in the United States in 2013 and 2014 by LawDragon 500 and was one of six lawyers selected by Law360 in 2014 as an MVP in the field of competition law. A champion for civil rights, he is a member of the Board of Trustees for the Lawyers' Committee for Civil Rights Under the Law, a national organization, and a Member of the ACLU of Maryland's Committee on Litigation and Legal Priorities.Mr. Pierson attended Macalester College, earning a B.A., magna cum laude, in Economics and Political Science, and graduated from the University of Michigan Law School, magna cum laude, where he was a Note Editor of the Michigan Law Review and a member of the Order of the Coif. Following law school, he served as a Law Clerk for the Honorable Harry T. Edwards, United States Court of Appeals for the District of Columbia Circuit, from 1983-1984 and as a law clerk for the Honorable Chief Judge John Feikens, United States District Court for the Eastern District of Michigan, from 1984-1985.

J. Douglas Richards

J. Douglas Richards is a Partner in the Antitrust practice group, having joined the firm in 2009. Mr. Richards has had a long, extensive and eclectic career, litigating on behalf of defendants for 16 years, serving as a government regulator at the Commodity Futures Trading Commission ("CFTC") and representing plaintiffs for the past 16 years. As a result, he brings a global understanding of antitrust litigation.

Mr. Richards' extensive experience litigating both Commodity Exchange Act and Sherman Act claims and his expertise in the antitrust class action field is widely recognized. He was named one of twenty-two antitrust "Litigation Stars" nationally, as one of the world's leading competition lawyers by *The International Who's Who of Competition Lawyers and Economists* (2014), and has received the highest available peer ranking for many years from *Martindale-Hubbell*. Mr. Richards has been appointed co-lead counsel in numerous large antitrust class actions in the Southern District of New York (SDNY) and nationally. Mr. Richards has argued dozens of appeals, among them a number of antitrust matters that have helped shape the landscape of antitrust law, including *Bell Atlantic v. Twombly*, 550 U.S. 544 (2007) before both the Second Circuit and the United States Supreme Court, and Second Circuit cases like *In re Tamoxifen Citrate Antitrust Litig.*, 429 F.3d 370 (2d Cir. 2005), cert. denied, 127 S.Ct. 3001 (2007), and *Kruman v. Christie's Int'l PLC*, 284 F.3d 384 (2d Cir. 2002).

Mr. Richards possesses extensive experience in the Commodity Exchange Act field, having served as Deputy General Counsel of the Commodity Futures Trading Commission ("CFTC") from 1997 to 2000. During that time, Mr. Richards assumed responsibility for all litigation by and against the CFTC (including personally arguing numerous appeals on behalf of the CFTC), and for two of those years simultaneously managed the CFTC's adjudicatory functions. In 1999, the Commission awarded Mr. Richards a Special Service Award for performing those two roles at the same time and successfully eliminating a long-standing backlog of Commission adjudicatory matters.

Mr. Richards is a leading lawyer nationwide in pharmaceutical antitrust litigation, a specialization that requires a deep understanding of the drug industry, patent law, FDA regulation and trade regulation. Starting in 2000 with the *Cipro* litigation, Mr. Richards was co-lead counsel on several antitrust lawsuits challenging the pharmaceutical industry's practice known as pay-for-delay, or reverse payments. Many of those cases hit a roadblock in the courts, when the courts adopted a scope of patent rule. Following the Supreme Court's decision in *Actavis* in 2012, the Supreme Court overruled the legal standards that had been adopted in the

lower courts of appeals and opened the door for further litigation. In the wake of *Actavis*, Mr. Richards leads a team of litigators that have filed new pay-for-delay reverse payments cases.

Mr. Richards graduated with honors from the University of Chicago, majoring in Economics, and earned his J.D. from Harvard Law School. Prior to joining Cohen Milstein, Mr. Richards served as head of the antitrust class action group at two major plaintiffs firms and, before that and his government service at the CFTC, Mr. Richards served as a litigation partner in a boutique law firm. He is a noted speaker at professional conferences, discussing the trends in commodities and pharmaceuticals antitrust law. He has written extensively about antitrust laws, including chapters for books edited by the American Antitrust Institute covering issues of class action practice, law reviews, and other scholarly publications.

Karen L. Handorf

Karen L. Handorf is a Partner at Cohen Milstein, and chair of the Firm's Employee Benefits (ERISA) Practice Group. She joined the Firm in 2007, following a distinguished career in government service, litigating ERISA cases in federal appellate and district courts. In her role as head of the Employee Benefits Practice, Ms. Handorf represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases in the district courts and on appeal.

Ms. Handorf is involved in litigation and appeals involving a broad range of employee benefits issues including church plans. In Kaplan v. St. Peter's Healthcare System, she represents a class of 2,800 participants in an alleged church plan, a case in which the Court of Appeals upheld the rights of St. Peter's pension fund participants to a fully funded pension plan. In addition, she currently leads a team of litigators in a series of church plan lawsuits alleging that health care systems wrongfully claim their benefit plans are exempt from ERISA's protection. Ms. Handorf is overseeing and developing these cases.

Prior to joining Cohen Milstein, Ms. Handorf was an attorney for the U.S. Department of Labor (DOL), where she litigated ERISA cases in federal appellate and district courts for 25 years. While at the DOL, she played a major role in formulating the Government's position on ERISA issues expressed in amicus briefs filed by the Solicitor General in the United States Supreme Court.

She began her ERISA career as a trial attorney in the Plan Benefits Security Division (PBSD), where she litigated actions brought by the Secretary of Labor for violations of the fiduciary standards of ERISA and handled appellate matters. In 1989, she was appointed Counsel for Decentralized and Special Litigation responsible for supervising the DOL's ERISA appellate litigation, district court litigation brought by regional offices of the Solicitor of Labor and administrative litigation involving the civil penalty provisions of ERISA. At the DOL, Ms. Handorf established and supervised PBSD's amicus brief writing program, which addressed a wide range of novel and difficult ERISA issues in both state and federal court. In 2001, she was appointed Deputy Associate Solicitor of PBSD. As the Deputy Associate Solicitor, she was responsible for overseeing litigation brought by the Secretary of Labor and legal advice provided to the Employee Benefit Security Administration, which administers Title I of ERISA. In 2005, she returned to her position as supervisor of the ERISA appellate and amicus brief writing program, serving as Counsel for Appellate and Special Litigation.

Currently, Ms. Handorf is litigating a series of church plan cases, including:

- Saint Peter's Healthcare System Church Plan Litigation: Cohen Milstein is co-lead counsel in Kaplan v. St. Peter's Healthcare System alleging that the defendants wrongfully claim their pension plan is

exempt from ERISA protection. Ms. Handorf argued the case before the U.S. Court of Appeals for the Third Circuit, which unanimously ruled that St, Peter's pension plan does not qualify as a "church plan." The Third Circuit further noted that as of 2012, religiously affiliated hospitals accounted for seven of the nation's 10 largest nonprofit healthcare systems and that to construe the church plan exemption to apply to such hospitals would defeat the purpose of ERISA. The ruling is likely to set the tone for other church plan litigation.

Her past successes include:

- Goodyear Litigation: Ms. Handorf represented a class of 30,000 Goodyear union retirees in Redington v. Goodyear (N.D. Ohio), in which Cohen Milstein obtained approval of a class action settlement between the retirees, Goodyear and the United Steel Workers, resulting in the establishment of a $1 billion trust through which retiree health care benefits will be provided in the future.

Ms. Handorf is a recipient of the Department of Labor Distinguished Career Service Award, and received Exceptional Achievement Awards for her work on ERISA 401(k) plan remedies, the amicus brief in the Enron litigation, retiree health care, the amicus program in general, the appellate brief in the Department's Tower litigation, termination annuities litigation and multiple employer welfare arrangement (MEWAs) litigation.

Ms. Handorf has been recognized for her expertise by her colleagues in the ERISA bar, who named her a Fellow of the American College of Employee Benefits Counsel. She is a frequent speaker on ERISA issues for the ABA, various bar associations and private seminars, and serves as plaintiffs' co-chair of preemption subcommittee of the Employee Benefits Committee of the ABA's Labor Section. In 2016, she was named to the *Best Lawyers in America*.

Ms. Handorf attended the University of Wisconsin-River Falls, where she received a B.S. in Speech and History, and earned her law degree from the University of Wisconsin Law School.

Martha Geer

Judge Martha Geer is a Partner at Cohen Milstein and will be head of the firm's new Raleigh, North Carolina office. She joined the firm in May 2016 after a distinguished career on the North Carolina Court of Appeals. Judge Geer's background – almost two decades as a respected litigator and appellate advocate handling complex civil litigation followed by more than 13 years as a rarely-reversed appellate judge – is a composite of experience few attorneys have. Her combined litigation and judicial experience gives her a unique perspective and insight that will benefit her clients at the trial level and on appeal. In returning to private practice, Judge Geer will practice across all of the firm's areas of expertise, working at both the trial and the appellate levels.

Judge Geer was first elected to the North Carolina Court of Appeals in 2002, receiving more than a million votes statewide. In 2010, because of her reputation as a fair and impartial judge, she garnered bipartisan support that resulted in her winning re-election by a 20-point margin. During her tenure on the Court, Judge Geer has heard more than 3,800 appeals, authored more than 1,350 opinions, and had her opinions reversed less than 2% of the time. As one of the most experienced Court of Appeals judges, Judge Geer has been responsible for hearing and deciding appeals on a wide variety of issues involving almost every area of law. She also served on the Court's Executive Committee, which works with the Chief Judge in administration of

the Court. During her service on the Court, she was named Outstanding Appellate Judge by the North Carolina Advocates for Justice.

Judge Geer's time on the bench has enhanced her ability to understand what judges – trial and appellate – need and want to know in order for clients to prevail at both the trial and appellate levels. Because of the similarity of intermediate appellate courts across jurisdictions, her experience and knowledge gained in North Carolina is valuable in litigation and appeals pending in all jurisdictions including the federal courts, making her a unique resource for clients. In addition, Judge Geer's reputation as an intelligent, practical, fair, and unbiased judge increases her credibility when arguing before other judges whether at the trial level or on appeal.

Illustrating the diversity of practice areas involved in her opinions, in *Boyd v. Robeson County*, Judge Geer wrote an opinion holding in a case of first impression for North Carolina that the office of a county sheriff is a "person" that may be sued under 42 U.S.C. § 1983, allowing an inmate to sue for violation of her Eighth Amendment rights when a jail failed to provide medical treatment after her appendix burst. In another opinion authored by Judge Geer, *Diggs v. Novant Health Inc.*, the Court held, again in a case of first impression, that a hospital could be liable under an apparent agency theory for the negligence of independent contractor anesthesiologists. In *Mason v. Dwinnell*, Judge Geer's opinion held that a trial court had authority, under the federal constitution, to award custody of a child, including visitation, to a same-sex domestic partner who was not a legal parent of the child. Judge Geer's opinion in *Blinson v. State* upheld the constitutionality, under the federal and state constitutions, of economic tax incentives granted to corporations in order to bring jobs to the State.

Prior to going on the bench, Judge Geer was a partner with two leading North Carolina plaintiffs' firms and was one of the founders of the second firm. She was a highly respected trial and appellate litigator known for obtaining cutting-edge and precedent-setting victories in a diverse set of practice areas, including among others, securities litigation, labor and employment law, ERISA, antitrust and trade regulation, commercial litigation, consumer protection, and constitutional and civil rights litigation (including suits against the State, sheriffs, counties, and municipalities). She was selected for inclusion in *Best Lawyers in America*, and recognized by the journal *Business North Carolina* as one of North Carolina's "Legal Elite" – a list of the top 200 lawyers in the State.

Judge Geer began her legal career with Paul Weiss Rifkind Wharton & Garrison where she was taught that a bright, hardworking lawyer, willing to learn, can handle any type of litigation – a philosophy that led to her eclectic practice upon leaving Paul Weiss. While at Paul Weiss, she had the privilege of working with nationally-respected litigators, including legal icons such as Arthur Liman, on high profile cases including the litigation arising out of the attempt to corner the silver market in 1979-1980. She also gained experience defending shareholder derivative and corporate takeover litigation. Judge Geer did substantial pro bono work, including being part of a team that obtained a stay of execution on behalf of a mentally retarded man on death row who was subsequently shown to be innocent by DNA testing, once such testing finally became available. That work led to her being one of the recipients of the 2004 Dybwad Humanitarian Award, the highest honor of the American Association on Intellectual and Developmental Disabilities.

As both a judge and a lawyer, Judge Geer has worked to improve the quality of legal representation through service on the Appellate Specialization Committee of the North Carolina State Bar, the Appellate Rules Committee of the North Carolina Bar Association, the Board of Governors of the North Carolina Advocates for

Justice, and various committees of the American Bar Association and other bar association groups. She is also a highly sought after teacher of continuing education programs for both other judges and lawyers.

Judge Geer received her B.A. *summa cum laude* from Bryn Mawr College and her J.D. with high honors from the University of North Carolina School of Law where she was a Morehead Fellow and served as Managing Editor of the *North Carolina Law Review*.

Geoffrey Graber

Geoffrey Graber is a Partner at Cohen Milstein and a member of the Consumer Protection practice group. In this role, Mr. Graber specializes in complex litigation aimed at protecting consumers deceived and harmed by consumer service providers such as banks, insurance and health care companies. In addition, he is a member of the Commercial Contingency practice and also represents whistleblowers under the False Claims Act.

Currently, Mr. Graber is litigating the high-profile lawsuit arising out of the massive data breach at Anthem Inc. that compromised the personal identification and health information of more than 80 million customers of the health care company. The lawsuit alleges the company failed to take adequate measures to ensure its data systems were protected, failed to take available steps to prevent and stop the breach from happening, and failed to disclose to its customers the material facts that it did not have adequate computer systems and security practices to safeguard customers' financial accounts and personal data. Mr. Graber is involved in all aspects of the litigation.

Prior to joining the firm in 2015, Mr. Graber served as Deputy Associate Attorney General and Director of the Residential Mortgage-Backed Securities (RMBS) Working Group at the United States Department of Justice (DOJ).

As Director of the RMBS Working Group, Mr. Graber oversaw the DOJ's nationwide investigation into the packaging and sale of mortgage-backed securities leading up to the financial crisis. He supervised and coordinated the efforts of over 100 prosecutors, lawyers, investigators and analysts from the DOJ. Mr. Graber also worked closely with senior officials from the United States Securities & Exchange Commission, the Department of Housing and Urban Development, the Inspector General's Office for the Federal Finance Agency and the offices of more than 10 state attorneys general.

The investigations overseen by Mr. Graber ultimately recovered more than $36 billion. These recoveries include the record-breaking $16.65 billion settlement reached in August 2014 with Bank of America – the largest settlement with a single entity in U.S. history – as well as settlements with Citigroup ($7 billion) and JP Morgan ($13 billion).

Earlier in his tenure at the DOJ, Mr. Graber served as Counsel in the Civil Division, where he proposed and then led the three-year investigation of Standard & Poor's and its ratings of structured finance products from 2004 to 2007. As the lead lawyer overseeing the investigation, he supervised a team of over 50 prosecutors, DOJ lawyers, investigators and analysts. The investigation, which made groundbreaking use of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), resulted in the largest enforcement action filed by the United States concerning the financial crisis (United States v. Standard & Poor's).

Before joining the Department of Justice, Mr. Graber was an associate at a top-tier defense firm, where he defended Fortune 500 companies and their officers and directors in securities and derivative suits, consumer class actions and government investigations. Mr. Graber also devoted substantial time to pro bono representation of indigent individuals and families in civil rights actions against local law enforcement.

In 2014, Mr. Graber received the Attorney General's Distinguished Service Award for his work relating to the $13 billion settlement with JP Morgan – including, at the time, the largest FIRREA penalty recovered by the Department of Justice. In October 2015, he again received the Attorney General's Distinguished Service Award for his work on the successful investigation of and litigation against S&P.

Mr. Graber received his undergraduate degree in Philosophy from Vassar College, and earned his law degree from the University of Southern California Law School, where he served as the Managing Articles Editor on Southern California Law Review.

Leslie M. Kroeger

Leslie M. Kroeger is a Partner at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practice groups. Ms. Kroeger joined Cohen Milstein in January 2014 and is based in the firm's Florida office. She specializes in complex, high-profile product liability, wrongful death, and managed care abuse litigation.

Ms. Kroeger is a highly accomplished civil trial attorney who began her legal career in the courtroom as an Assistant Public Defender and later became an Assistant State Attorney in Miami-Dade County, Florida. She then moved into private practice where she continues to handle a variety of complex civil litigation matters both in the state of Florida and nationwide.

Currently, Ms. Kroeger is litigating the following notable matters:

- HCA: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that two Florida women and others like them were billed inflated and exorbitant fees for emergency radiology services covered in part by their Florida Personal Injury Protection (PIP) insurance. Ms. Kroeger is involved in all aspect of the litigation charging HCA hospitals with gouging patients with PIP coverage. The case is ongoing.
- United States of America, et al. v. AIDS Healthcare Foundation, Inc.: Cohen Milstein represents three former managers of the AHF in a Federal and Florida State Whistleblower Act claims against the nation's largest provider of HIV/AIDS medical care for illegal patient referral kickbacks. Ms. Kroeger has been involved in all aspects of the litigation. The case is ongoing.

Ms. Kroeger has successfully litigated the following lawsuits:

- *Mincey v. Takata*: Cohen Milstein was lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic in 2014 when the driver's side airbag in her Honda Civic deployed too aggressively during a collision due to a product defect. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia casued by the problematic airbag. The suit charged that Takata, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by the firm showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016

- *Quinlan v. Toyota Motor Corporation*: Cohen Milstein was lead counsel in a product liability case filed against Toyota Motor, alleging that manufacturing defects in the defendant's car caused the car being driven by the plaintiff Quinlan to suddenly accelerate and go out of control, resulting in catastrophic injuries that left him a quadriplegic. The defendant entered into a settlement, which is confidential. Ms. Kroeger was engaged in all aspects of the litigation.
- *Love v. Walmart*: Ms. Kroeger represented individual female Walmart employees in a lawsuit alleging that the company discriminated against them on the basis of their sex. The defendant reached a confidential settlement with the plaintiffs.
- Caterpillar Antitrust Litigation: Cohen Milstein was co-lead counsel in a nationwide product liability class action lawsuit alleging Caterpillar sold diesel engines with defective exhaust emissions system that resulted in power losses and shutdowns. Ms. Kroeger was involved all aspects of the litigation.

Ms. Kroeger has achieved an AV rating from Martindale-Hubbell, and has been recognized by Best Lawyers in the field of Product Liability Litigation – Plaintiffs. She was recently named to Law360's Product Liability Editorial Advisory Board. She speaks frequently on strategies and tactics for addressing the standards for expert witness testimony in light of the Supreme Court's Daubert ruling.

Ms. Kroeger currently serves as the Secretary on the Executive Committee of the Florida Justice Association and is past Chair of the Women's Caucus. She serves on the Florida Bar Professional Ethics Committee. She is Past President of the Martin County Chapter of the Florida Association for Women Lawyers and is on the Board of Directors of Guardians for New Futures; as well as serving as an active member of The Florida Bar, the American Association for Justice, the Palm Beach County Bar Association, the Martin County Bar Association, the Palm Beach County Justice Association, and the Florida Association for Women Lawyers, Martin County Chapter.

Ms. Kroeger graduated with high honors from the University of Tennessee at Knoxville, and obtained her law degree from the Cumberland School of Law, Samford University. Following law school, she served in a trial clerkship in Miami.

Victoria S. Nugent

Victoria S. Nugent is a Partner at Cohen Milstein and Co-Chair of the Public Client practice group. She has been with the Firm since 2000 and her work has focused on consumer protection and public health and safety.

Ms. Nugent began at Cohen Milstein in the Firm's Consumer Protection & Unsafe Products Practice, where she focused on consumer protection and public health litigation. Past cases include In re StarLink Product Liability Litigation, in which she represented farmers suing Aventis CropScience after an unapproved variety of genetically modified corn was detected in the U.S. corn supply and drove down prices for all U.S. corn exports. More than $100 million was recovered for the class in a landmark settlement. In 2009 and 2010, Ms. Nugent filed suit on behalf of consumers challenging the post-transaction marketing practices (also sometimes called "negative option marketing") and in two significant rulings persuaded federal courts in California and Washington that these practices run afoul of state consumer protection laws. Ms. Nugent has argued cases before the high courts of Georgia, Nebraska and the District of Columbia, as well as the federal D.C. Circuit Court of Appeals.

Ms. Nugent joined the Firm's Public Client Practice Group in 2011, where she is currently, representing several states in investigations into Medicaid and consumer fraud by numerous for-profit nursing home chains that

promised, but failed to provide, basic care to their elderly residents. Ms. Nugent has been overseeing all aspects of these investigations.

Ms. Nugent has represented public clients on other matters involving consumer and financial fraud. Some of her successes include:

- Represented the states of Arizona and Nevada in litigation against Bank of America for deceptive conduct in connection with servicing approximately 500,000 mortgages; resulting in financial payments to consumers and the states, commitments to mortgage modifications and other equitable relief valued at nearly $1 billion.
- Represented the state of Nevada in investigations into the conduct of Deutsche Bank and the Royal Bank of Scotland, two of the investment banks that encouraged and enabled the predatory lending practices of retail lenders. Ms. Nugent helped develop the State's legal theories and claims and handled numerous aspects of these investigations.

Prior to joining the Firm, Ms. Nugent worked for seven years at Public Citizen, a national consumer advocacy organization. There, she worked on many legislative and regulatory campaigns addressing issues that ranged from automobile safety to international trade policy. After graduating from law school in 1998, Ms. Nugent received a two-year fellowship sponsored by the National Association for Public Interest Law (NAPIL). As a NAPIL Fellow, she worked at Trial Lawyers for Public Justice, where she helped develop and prosecute impact litigation in the areas of arbitration, banking, credit and insurance.

Ms. Nugent has served on the D.C. Bar Committee on the Rules of Professional Conduct since 2012.

Benjamin D. Brown

Benjamin D. Brown is a Partner at Cohen Milstein, and a member of the Antitrust Practice Group, having joined the firm in 2005. Mr. Brown, who previously served in the Antitrust Division of the United States Department of Justice, brings to his role extensive experience leading complex litigation, particularly antitrust class actions.

Mr. Brown has been appointed by federal courts to serve as co-lead counsel or on steering committees for plaintiffs in numerous important matters, such as In re Plasma-Derivative Protein Therapies Antitrust Litigation (N.D. Ill.); Allen, et al. v. Dairy Farmers of America, Inc. (D. Vt.); and In re Puerto Rican Cabotage Antitrust Litig. (E.D. Ca.). He has led cases through trial and argued appeals and stands ready to take cases through to the finish line.

Mr. Brown is also a leader in the area of takings cases, claims that are brought under the Fifth Amendment of the U.S. Constitution for the unconstitutional taking of property without compensation. He also represents individuals or groups in litigations and confidential arbitrations involving complex commercial disputes, particularly those involving regulated markets.

Currently, Mr. Brown is litigating a number of large, complex antitrust lawsuits, where he plays a prominent role and leads all aspects of the litigation, from deciding on the claims to be brought, the strategy to be pursued and charting the course of the case. Notable matters include:

- Mixed Martial Arts (MMA) Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action on behalf of elite MMA fighters alleging that Zuffa LLC – commonly known as the Ultimate Fighting

Championship or "UFC" – has unlawfully monopolized the markets for promoting live professional MMA bouts and for purchasing the services of elite professional MMA fighters. The district court denied the defendant's motion to dismiss the case in September 2015 and discovery is ongoing. Mr. Brown is co-lead in the class action lawsuit.

- Northeastern Dairy Antitrust Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit on behalf of Northeast dairy farmers against Dairy Farmers of America (DFA) and Dean Foods Company charging a conspiracy to reduce competition for raw milk and that DFA monopolized the milk market in the Northeast, forcing dairy farmers to market their milk through DFA or its affiliate Dairy Marketing Services (DMS). Dean has settled its liability and the case against DFA is ongoing.
- People of the State of California v. American Express Unfair Competition Litigation: Cohen Milstein is counsel for the City of San Francisco in litigation alleging that American Express, by prohibiting merchants from steering consumers to less costly payment methods (including debit cards and cash), is responsible for unlawful overcharges borne by retailers and, indirectly, all California consumers. Mr. Brown is lead outside counsel to the city in the ongoing litigation.

Mr. Brown is also currently litigating a number of takings lawsuits, including the following notable matters:

- Ideker Farms, et al. v. the United States of America: Cohen Milstein represents Ideker Farms and more than 400 other plaintiffs located in six states along the Missouri River in a mass action lawsuit in the U.S. Court of Federal Claims alleging that the federal government took land and flooding easements over lands owned by farmers without any compensation in violation of the takings clause of the Fifth Amendment. Mr. Brown has been directing and leading all aspects of the litigation for the Cohen Milstein team. The case is set to go to trial in 2017.
- Big Oak Farms, Inc., et al. v. the United States of America: Cohen Milstein represents a group of farmers along the Mississippi River in a Fifth Amendment takings case alleging that the U.S. Army Corps of Engineers intentionally flooded plaintiffs' land without providing just compensation. Mr. Brown has been directing and leading all aspects of the litigation.

Mr. Brown also represents classes or individual corporations in the following commercial disputes:

- DairyAmerica Antitrust Litigation: Cohen Milstein is sole lead counsel of a putative class of dairy farmers who allege that defendants fraudulently misreported nonfat dry milk prices to the National Agricultural Statistics service, resulting in artificially depressed raw milk prices and unfairly depriving American dairy farmers of tens or hundreds of millions of dollars. Mr. Brown directs and leads all aspects of the litigation.
- Inmate Calling Services Provider Litigation: Cohen Milstein is on the executive committee in several nationwide class action lawsuits alleging that the providers of inmate calling services have charged inmates and their families unjust and unreasonable rates in violation of the Federal Communications Act and various state laws. Mr. Brown leads the Cohen Milstein team on these class action lawsuits. The litigation is ongoing.
- College Media Commercial Litigation: Cohen Milstein represents an e-commerce business in a breach of contract action against a former partner business. Mr. Brown leads that litigation, which is now pending in federal bankruptcy court.

The Legal 500 has recognized Mr. Brown as one of the nation's leading class action antitrust attorneys and he has been listed as one of Washington D.C.'s "Leading Star" Plaintiffs' Litigators by Benchmark Litigation,

recognizing his writing, his depositions and his arguments in court. He is a frequent panelist at legal industry gatherings and is a recognized expert on antitrust litigation whose opinions on the newest developments and trends in antitrust litigation are often quoted in the media. Mr. Brown is a contributing author of the ABA's Antitrust Class Actions Handbook, and has served as a state editor for the ABA's Survey of State Class Action Law. He authored several chapters on private antitrust recovery actions for the Global Competition Review's Antitrust Review of the Americas, and co-authored with fellow partner Douglas Richards, "Predominance of Common Questions – Common Mistakes in Applying the Class Action Standard," Rutgers Law Journal (Vol. 41).

Mr. Brown joined Cohen Milstein's Antitrust Practice following four years as a trial attorney with the Antitrust Division of the United States Department of Justice. At the Department of Justice, Mr. Brown led and assisted in numerous investigations, litigations and trials involving antitrust activity and mergers. Mr. Brown also served as a Special Assistant United States Attorney in the Eastern District of Virginia, where he prosecuted criminal cases. Prior to serving in the U.S. Department of Justice, Mr. Brown was in private practice, where he counseled defendants in antitrust litigation matters. This experience has provided him with insights into defense strategies and has earned him the respect of defendants' counsel.

Mr. Brown attended the University of Wisconsin – Madison, where he graduated Phi Beta Kappa, majoring in Philosophy, and earned his J.D, from Harvard Law School, graduating cum laude. He served as Law Clerk to the Hon. Chief Judge Juan R. Torruella, U.S. Court of Appeals for the First Circuit. The United States District Court for the District of Columbia has honored Mr. Brown for his outstanding commitment to pro bono litigation.

Joshua S. Devore

Joshua Devore is a Partner at Cohen Milstein and a member of the Securities Litigation & Investor Protection Practice Group. In this role, Mr. Devore has distinguished himself in representing investors in complex high-profile securities fraud class actions and in guiding a broad range of class action lawsuits, from the massive BP Deepwater Horizon oil spill to the Parmalat securities litigation. His practice has led him to discovery efforts around the world, having taken depositions on four continents.
Mr. Devore's current cases include the following notable matters:

- BP Securities Litigation: Cohen Milstein is co-lead counsel in the long-running, procedurally complex case arising from the devastating Deepwater Horizon oil spill in the Gulf of Mexico. The U.S. Court of Appeals for the Fifth Circuit affirmed the class certification ruling of investors who purchased BP's American Depositary Shares on April 26, 2010, through and including May 28, 2010, and who were injured by BP's low-balling the severity of the oil spill in the aftermath of the Deepwater Horizon explosion. Mr. Devore is involved in all aspects of the litigation.

- Kingate Global and Kingate Euro Funds Litigation: Cohen Milstein is co-lead counsel in a lawsuit that alleges Kingate Global and Kingate Euro, feeder funds in the Bernard Madoff Ponzi scheme, and several related entities failed in their obligations to protect investors in the funds. The lawsuit was initially dismissed on the basis of Securities Litigation Uniform Standards Act of 1998 (SLUSA), but that decision was reversed on appeal by the Second Circuit in an opinion that has set a new standard on which claims are precluded by SLUSA and which are not. Mr. Devore is involved in all aspects of the litigation.

- State of Mississippi v. Moody's Corp. Litigation: Cohen Milstein is representing the Attorney General of the State of Mississippi in a consumer protection action addressing Moody's misrepresentation of its

independence and objectivity in its analysis of structured finance securities in the years leading up to the financial crisis. Mr. Devore is involved in all aspects of the litigation.

- Broadcom Merger Litigation: Cohen Milstein is lead counsel representing institutional investors in a litigation challenging the $37 billion Broadcom-Avago merger. The lawsuit alleges the transaction was structured to benefit management and insiders with a controlling share of Broadcom, at the expense of the common shareholders. Mr. Devore is involved in all aspects of the litigation.

Some of Mr. Devore's successes include:

- In re Lucent Technologies Securities Litigation: $575 million settlement. Cohen Milstein co-lead counsel, representing plaintiffs in a massive securities fraud class action in cash, stocks and warrants. The settlement ranks as one of the largest securities class actions in history. Mr. Devore was involved in all aspects of the litigation.

- In re Merrill Lynch Research Reports Securities Litigation: $125 million settlement. Cohen Milstein represented plaintiffs in a class action lawsuit alleging that Merrill Lynch's Internet analysts dishonestly recommended stocks whose prospects they viewed as dim. The complex case took more than six years to litigate. Mr. Devore was involved in all aspects of the litigation.

- In re Parmalat Securities Litigation: $90 million settlement. Cohen Milstein was co-lead counsel in a class action lawsuit involving Parmalat, a company often referred to as "Europe's Enron." The litigation involved the biggest fraud in European history, in which revenues were manufactured out of thin air and numerous Parmalat executives were indicted and went to prison. The litigation involved depositions around the world, and resulted in settlements with the company's two outside auditors and investment banks, as well as the "new" Parmalat that emerged following the scandal. Mr. Devore was involved in all aspects of the litigation.

- IntraLinks Litigation: $14 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that the company concealed the impending loss of its biggest client, the Federal Deposit Insurance Corporation, during the class period, which included a secondary stock offering. The lawsuit involved an intensive discovery period during which more than 1.9 million pages were produced and 23 depositions were taken. Mr. Devore was involved in all aspects of the litigation.

- LDK Solar Litigation: $16 million settlement. Cohen Milstein represented investors in a case involving a Chinese solar panel producer. The litigation entailed traveling to Hong Kong, setting up temporary offices, taking 14 depositions in a period of 15 days and reviewing thousands of documents, many of which were in Chinese. Mr. Devore was involved in all aspects of the litigation.

In addition, Mr. Devore has done the following pro bono work:

- U.S. Navy Humanist Chaplain Litigation: Mr. Devore, along with other Cohen Milstein attorneys, represented Jason Heap, who sued the U.S. Navy for rejecting his application to become a chaplain on the basis of his humanist religious beliefs, in violation of the Constitution. After hard-fought discovery, the case settled.

Mr. Devore has authored numerous briefs addressing complex and novel issues of federal securities laws, leading to notable reported decisions such as Lentell v. Merrill Lynch & Co., 396 F.3d 161 (2d Cir. 2005), that reversed a dismissal on statute of limitations grounds and reset the standards for pleading loss causation.

Mr. Devore attended Rice University, where he earned his B.A. in Chemistry, and graduated from Georgetown University Law Center, where he served as Executive Editor of the Georgetown International Environmental Law Review. He is co-author of State Court Class Actions: Trends and Issues, in the National Institute on Class Actions.

Manuel J. Dominguez

Manuel J. ("John") Dominguez is a Partner at Cohen Milstein, and a member of the Antitrust practice group. Mr. Dominguez specializes in complex, multi-district antitrust litigation, representing individuals and businesses that have been harmed by anticompetitive business practices. Mr. Dominguez, in addition, plays a significant role in the practice group identifying and investigating potential antitrust violations.

Mr. Dominguez has been litigating complex antitrust and consumer cases for more than 20 years, and has served as lead counsel and handled numerous high-profile, high-stakes cases during that time. His efforts have enabled aggrieved businesses and consumers to recover hundreds of millions of dollars. He litigated and resolved cutting-edge litigation against AOL for allegedly unlawfully collecting the Internet search data of millions of users and making their private information available for downloading by the general public. Earlier in his career, Mr. Dominguez litigated a highly significant securities matter that settled for hundreds of millions of dollars involving Symbol Technologies Inc., a barcode technology maker that intentionally overstated its revenues through premature revenue recognition, improper consignments arrangements and channel stuffing.

Mr. Dominguez, who joined Cohen Milstein in 2011, has assisted the firm in developing its investigatory and case development groups. He is a hands-on litigator who is currently representing plaintiffs in antitrust litigation involving alleged price-fixing and anticompetitive monopolistic practices in various industries including truck transmissions, medical products, auto industry and finance, among others. Although Mr. Dominguez's practice is focused on antitrust litigation, he continues to be involved in securities and consumer matters.

Mr. Dominguez is currently representing direct purchasers in a series of Auto Parts antitrust class action lawsuits being litigated in the Eastern District of Michigan in Detroit. These cases stem from the largest antitrust investigation in the history of the U.S. Department of Justice, with over $1 billion in fines and multiple criminal indictments. Two of the cases, Wire Harnesses and Bearings, are scheduled to be the first cases to be considered for certification by the court. In these cases, Mr. Dominguez has significant responsibilities, including leading discovery efforts against defendants and assisting experts.

Mr. Dominguez is also co-lead counsel in the Truck Transmissions Antitrust Litigation alleging that Eaton Corp., the largest manufacturer of truck transmissions, and the four major truck manufacturers conspired to create a monopoly for transmissions used in heavy-duty trucks. Mr. Dominguez responsibilities include arguing all the major motions and deposing and defending nearly all the expert depositions in this matter. The case is currently up on appeal in the Third Circuit.

Mr. Dominguez began his career as an Assistant Attorney General serving in the Attorney General of the State of Florida's Department of Economic Crimes. In that role, he represented the state of Florida in prosecuting corporations and business entities for alleged violations of Florida's RICO, antitrust and Unfair and Deceptive Trade Practices Act statutes. Following his service as an Assistant Attorney General, Mr. Dominguez entered private practice, litigating and trying numerous cases involving unfair trade practices and other alleged violations of state and federal consumer protection statutes. In 2000, he joined a premier class action firm focused on antitrust and securities litigation; there, he rose to the head of the firm's antitrust and consumer practice groups. Mr. Dominguez recently won a significant motion to dismiss in a non-class action antitrust action brought on behalf of Doctors and practice groups against a major insurance company and hospital in Florida in Omni Healthcare, Inc. v. Health First, Inc. The issues presented and argued were issues of first impression for the middle district of Florida.

Mr. Dominguez is also nationally recognized for his knowledge of managing the discovery process in today's increasingly technologically complex business environment. He has made presentations on topics such as the impact of the new e-discovery amendments to the Federal Rules of Civil Procedure, and has also participated in The Sedona Conference® Working Group 1, an organization at the vanguard of developing standards for electronic discovery.

Mr. Dominguez formerly served as the Chair for the Antitrust, Franchise & Trade Regulation Committee of the Florida Bar's Business Law Section. Mr. Dominguez previously served as the Vice Chair of this committee and was a member of the Executive Council of Florida Bar's Business Law Section. He is also co-author of an article that appeared in the Florida Bar Journal, "The Plausibility Standard as a Double Edge Sword: The application of Twombly and Iqbal to Affirmative Defenses" (Vol. 84, No. 6).

Mr. Dominguez received a B.A. from Florida International University, and earned his J.D. from the Florida State University Law School, graduating with honors. In law school, he was a member of the Transnational Journal of Law and Policy.

Brent W. Johnson

Brent W. Johnson is a Partner at Cohen Milstein and a member of the Antitrust practice group. Along with Daniel Small, Mr. Johnson leads the group's new case investigations.

Mr. Johnson has considerable expertise in complex antitrust litigation and class actions, representing businesses and individuals as plaintiffs in federal and state civil actions with a focus on multi-district class actions. His class action experience spans multiple industries, such as motion pictures, dairy, building materials, chemicals, automotive parts, processed foods, private equity, adhesives and others. His practice encompasses a broad variety of antitrust claims, including Sherman Act Section 1 restraints of trade and Section 2 monopoly and monopsony claims. He has argued before federal district courts and state trial and appellate courts and brought cases to trial.

Mr. Johnson's recent successes include the following notable antitrust class actions:

- Northeast Dairy: In *Allen vs. Dairy Farmers of America* (D. Vt.), Mr. Johnson serves as lead counsel for one of two certified subclasses of Northeast dairy farmers against Dairy Farmers of America and Dairy Marketing Services who fixed the price of raw milk, allocated markets and agreed not to solicit dairy

farmers to supply raw milk. Defendant Dean Foods Company settled for $30 million, and the Court has preliminarily approved a $50 million settlement with the remaining defendants, DFA and DMS.

- Bulk Bleach: In *Grand Strand v. Oltrin* (D. S.C.) Mr. Johnson was personally appointed co-lead Class Counsel and led the CMST team in representing a class of direct purchasers of bulk bleach, including municipal water authorities and others, against that product's manufacturers who engaged in an illegal market allocation agreement. The Court approved a settlement worth nearly all of the class's single damages and remarked that the case had been "skillfully handled."
- Urethanes (Polyether Polyols): Mr. Johnson serves as co-lead counsel in *In re Urethane Antitrust Litigation* (D. Kan.), on behalf of a certified class of direct purchasers of several types of chemicals who were overcharged as a result of a nationwide price-fixing and market allocation conspiracy. In the litigation, multiple defendants collectively settled for over $130 million, and a jury verdict of $1.1 billion was secured against Dow Chemical, the final defendant, in 2013. Dow ultimately settled for $835 million while the case was on appeal before the Supreme Court, bringing the total recovery to $974 million – nearly 250% of the damages found by the jury.
- Blue Cross Blue Shield of Michigan: Mr. Johnson serves as co-lead counsel in *The Shane Group, Inc. v. Blue Cross Blue Shield of Michigan* (E.D. Mich.), representing a class of purchasers of hospital services against Blue Cross Blue Shield of Michigan for agreeing to MFN provisions in its contracts with hospitals throughout Michigan that required those hospitals to charge other insurers as much or considerably more for services provided to class members. The Court has finally approved a settlement with BCBSM for nearly $30 million.

Currently, Mr. Johnson is litigating the following antitrust class actions:

- VFX/Animation Workers: In *In re Animation Workers Antitrust Litigation* (N.D. Cal.), Mr. Johnson serves as co-lead counsel representing a class of animation and visual effects workers in a lawsuit alleging that the defendants, who include Pixar, Lucasfilm Ltd. and DreamWorks Animation, secretly agreed not to solicit class members and to coordinate on compensation.
- Drywall: Mr. Johnson serves as co-lead counsel in *In re Domestic Drywall Antitrust Litigation* (E.D. Pa.), representing a class of direct purchasers of drywall against drywall manufacturers for price-fixing. The Court has preliminarily approved a settlement of $40 million with a major defendant, and denied summary judgment to four defendants. The case is ongoing.
- Automotive Parts: In *In re Automotive Parts Antitrust Litigation* (E.D. Mich.), Mr. Johnson represents direct purchasers of wire harnesses, bearings and other automotive parts who were overcharged as a result of price-fixing and bid-rigging conspiracies by various sets of defendants throughout the automotive parts industry.

Prior to joining Cohen Milstein in 2009, Mr. Johnson practiced at one of the world's premier full-service global law firms, where he focused on antitrust litigation. Some of Mr. Johnson's matters included:

- *Feesers, Inc. v. Michael Foods, Inc. and Sodexho, Inc.* (M.D. Pa.): Mr. Johnson was a member of the successful trial team that represented Michael Foods, a manufacturer of processed egg products and refrigerated potato products, in a three week trial of a Robinson-Patman Act action brought by a broad-line distributor of food products.
- *Dahl, et al. v. Bain Capital, et al.* (D. Mass.): Mr. Johnson represented The Carlyle Group in a class action where plaintiffs alleged collusion among certain private equity firms and investment banks in specific going-private transactions in violation of Section 1 of the Sherman Act.

- *In re Aftermarket Filters Antitrust Litigation* (N.D. Ill.): Mr. Johnson represented Champion Laboratories, a manufacturer of aftermarket automotive filters, in a class action where plaintiffs alleged a conspiracy among manufacturers to fix prices in violation of Section 1 of the Sherman Act.
- *National Laser Technology, Inc. v. Biolase Technology, Inc.* (S.D. Indiana): Mr. Johnson represented Biolase, the country's largest manufacturer of lasers for dental applications, against Sherman Act claims brought by a competitor aftermarket dental laser support company. The matter resulted in a favorable settlement for the client.

Mr. Johnson also advised clients in the insurance, commodities exchange, chemical and energy industries in obtaining clearance of mergers, acquisitions and joint ventures from the Federal Trade Commission and the Antitrust Division of the Department of Justice in connection with premerger notification proceedings under the Hart-Scott-Rodino Antitrust Improvements Act.

Mr. Johnson has significant experience in other complex civil litigation, including mass torts and government contracts.

Mr. Johnson graduated *magna cum laude* from Duke University, with a B.A. in Political Science and Spanish, and attended Stanford Law School, where he earned his law degree. He is a member of the ABA Section of Antitrust Law. Along with Emmy Levens, he recently published an article on ascertainability in the Spring 2016 issue of the ABA's *Antitrust* magazine. In his pro bono work, he has represented Covenant House Washington, D.C., Habitat for Humanity International Inc. and the Cystic Fibrosis Foundation.

Betsy A. Miller

Betsy A. Miller is a Partner at Cohen Milstein and Co-Chair of the Public Client practice group. Ms. Miller represents state Attorneys General and municipalities in civil law enforcement investigations and enforcement actions involving consumer fraud and false claims. She joined the firm in 2009, helping to launch the Public Client practice and bringing with her a broad legal background that includes government service, private-sector litigation, complex dispute-resolution skills and teaching experience. An accomplished litigator, the *National Law Journal* named Ms. Miller to its prestigious list of Rising Stars in 2009, an honor bestowed on only 40 attorneys under the age of 40 in Washington, D.C.

Prior to joining Cohen Milstein, Ms. Miller served as the Chief of Staff and Senior Counsel to the Attorney General for the District of Columbia. In that capacity, Ms. Miller managed high-profile legal issues and policy initiatives for the Attorney General, serving as the chief liaison to multiple agencies and members of the D.C. Council. Ms. Miller also served as the Mayor's lead labor and employment lawyer during the historic transition of the D.C. Public Schools from an independent agency to one operating under governmental supervision.

Ms. Miller previously served in the federal government as Counsel on the U.S. Senate Committee on the Judiciary, where she worked for Chairman Patrick J. Leahy (D-VT). Ms. Miller was responsible for handling presidential nominations to the federal judiciary, the Department of Justice, the Federal Bureau of Investigation and to U.S. Attorney's Offices.

Ms. Miller also spent eight years as a litigator for two premier defense firms, where she represented some of the nation's largest companies and individuals in matters including First Amendment issues, complex contract disputes, collective bargaining negotiations and arbitration, employment class actions and challenges to

independent contractor classification. Her civil defense experience adds to Ms. Miller's deep and balanced litigation skillset.

Currently, Ms. Miller represents public clients in the following high-profile matters:

- The state of Mississippi's litigation against Moody's for misrepresenting its analytical services related to structured finance securities (such as CDOs, RMBS, and various mortgage-backed securities) as independent and objective. The lawsuit alleges that Moody's deceived the government and citizens of Mississippi because these analytical services were tainted by motives for increased profits and market share at the expense of independence and objectivity.
- A different state in its confidential investigation of a rating agency for misrepresenting its structured finance securities business model as independent and objective.
- The state of Hawaii in its litigation against Living Essentials, Inc., the creator of 5-Hour ENERGY, for misrepresenting the benefits of drinking its so-called "liquid energy shot."

Ms. Miller's investigation and litigation successes include matters in the financial, health care and employment law sectors. Recent examples include:

- Representing the state of Mississippi, a Lead State on the Executive Committee, in the landmark consumer fraud lawsuit against McGraw Hill Financial (a/k/a Standard & Poor's), over the misrepresentation of its structured finance securities business as independent and objective; resulting in a global resolution for 19 states, the District of Columbia and the United States Department of Justice in the amount of $1.375 billion.
- Representing the states of Arizona and Nevada in litigation against Bank of America for deceptive conduct in connection with servicing approximately 500,000 mortgages; resulting in financial payments to consumers and the states, commitments to mortgage modifications and other equitable relief valued at nearly $1 billion.
- Representing the state of Montana in an investigation of a Fortune 100 company regarding alleged misclassification of employees as independent contractors; resulting in a multi-million dollar resolution for the state.
- Representing other state attorneys general and municipalities in numerous confidential investigations and settlements.
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Earlier in her career, Ms. Miller was a full-time mediator and negotiation consultant. She also was engaged by the Kennedy School of Government to evaluate mediation and arbitration programs across Central America, after which she contributed to a book on the same subject.

Ms. Miller has been a longstanding member of Georgetown University Law Center's adjunct faculty, which she joined in 2001. There, she teaches courses on mediation advocacy and negotiation strategy. She has taught intensive negotiation courses for practitioners attending Harvard Law School's Negotiation Institute (formerly Harvard's Program of Instruction for Lawyers), as well as for a variety of federal and state government agencies, law firms, corporations and non-profit organizations.

Ms. Miller has authored several articles, including her most recent publication, "Untapped Potential: Creating a Systematic Model for Mediation Preparation," which appears as Chapter 13 in the *AAA Handbook on Mediation* – Third Edition (2016).

Ms. Miller received her undergraduate degree in Comparative Literature from Dartmouth College, graduating *magna cum laude* and Phi Beta Kappa, and earned her law degree from Harvard Law School, where she was an editor on the *Harvard Human Rights Journal* and the *Harvard Latino Law Review*. She is the recipient of Harvard Law School's post-graduate Heyman Fellowship for government service and academic excellence and Harvard Law School's Kaufman Fellowship for public service. Following law school, she clerked for the Honorable Thomas Penfield Jackson in the U.S. District Court for the District of Columbia.

Gary L. Azorsky

Gary L. Azorsky is a Partner at Cohen Milstein, and Co-chair of the Firm's Whistleblower/False Claims Act Practice. Mr. Azorsky joined Cohen Milstein in 2012, establishing the practice. In his role, Mr. Azorsky pursues whistleblower cases under the federal and state false claims act statutes in the health care, pharmaceutical, banking and defense contractor industries and other industries that conduct business with the government. Mr. Azorsky specializes in the complex, highly detailed process for filing and pursuing these cases. In his practice, he has helped right wrongs and to recover nearly $2.5 billion in defrauded funds for federal and state governments, including hundreds of millions of dollars for whistleblower clients.

Most recently, Mr. Azorsky served as co-lead counsel in the qui tam action against the pharmaceutical company Wyeth pending in the District of Massachusetts, in which more states joined to intervene along with the government of the United States than had ever before intervened in a qui tam action. (*United States of America et al., ex rel. Lauren Kieff, v. Wyeth*, No.1:03-CV-12366-DPW [D.Mass.].) The $784.6 million settlement was the seventh-largest False Claims Act recovery on record and the second-largest recovery in history involving a single class of drugs. Mr. Azorsky worked alongside Department of Justice attorneys and states Attorneys General throughout the 12-year pendency of the case.

Mr. Azorsky was actively involved in precedent-setting cases, such as the series of Ven-A-Care cases, which were among the first large FCA multi-state cases and laid the groundwork for much of the false claims act litigation that goes on today. He has also represented whistleblowers in False Claims Act cases involving defense contractors, off-label marketing and misbranding by pharmaceutical companies and fraud in connection with the banking industry, for-profit colleges and student loan programs. In addition, Mr. Azorsky represents whistleblowers in tax fraud claims against large and small corporations through the IRS Whistleblower Office, as well as whistleblowers alleging violations of the Foreign Corrupt Practices Act and violations of the federal securities laws filed with the SEC Whistleblower Office.

Mr. Azorsky served as co-counsel for the whistleblower on the following representative matters:

- *United States of America ex rel. Ven-a-Care of the Florida Keys Inc. v. Dey Laboratories, et al.*, Civil Action No. 05-11084 (D. Mass) ($280 Million settlement in December 2010)
- *United States of America ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 07-10248 (D. Mass.) ($280 Million settlement in December, 2010)
- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($6.5 Million settlement with Dey Laboratories, Inc. in March 2010)
- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($9.57 Million settlement with Schering-Plough in December 2009)

- *Florida ex rel. Ven-A-Care of the Florida Keys Inc. v. Boehringer Ingelheim Corp, et al.*, Civil Action No. 98-3-32A (Leon Cty., Fla.) ($8.5 Million settlement with Boehringer Ingelheim in December 2009)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Roxane Laboratories, Inc., Boehringer Ingelheim Pharmaceuticals, Inc., Ben Venue Laboratories, Inc. and Boehringer Ingelheim Corporation*, Civil Action No. GV3-03079 (Travis Cty., Tex.) ($10 Million settlement with Boehringer Ingelheim in November 2005)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Warrick Pharmaceuticals Corporation, Schering Plough Corporation, Schering Corporation*, Civil Action No. GV002327 (Travis Cty., Tex.) ($27 Million settlement with Schering-Plough in May 2004)
- *Texas ex rel. Ven-A-Care of the Florida Keys Inc. v. Dey, Inc., Dey, L.P.*, Civil Action No. GV002327 (Travis Cty., Tex.) ($18.5 Million settlement with Dey Laboratories, Inc. in June 2003)

Mr. Azorsky is recognized for his expertise. He has served as an expert witness in a legal malpractice case concerning qui tam practice. He has provided expert guidance on the False Claims Act in congressional hearings, as well as before the Vermont Senate Judiciary Committee in support of the passage of a False Claims Act for the state. In addition, he regularly speaks before professional audiences regarding the federal and state False Claims Acts.

Mr. Azorsky is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the Federal False Claims Act and its qui tam provisions. Prior to joining Cohen Milstein, in addition to his Whistleblower/False Claims Act practice, he was actively involved in groundbreaking civil rights, commercial and intellectual property litigation, including Internet and software industry-related litigation.

Mr. Azorsky is a graduate of the University of Pennsylvania, with a B.A. in English, and received his law degree from Cornell University Law School.

Jeanne A. Markey

Jeanne A. Markey, is a Partner at Cohen Milstein and Co-Chair of the firm's Whistleblower/False Claims Act practice group. She has successfully represented whistleblowers in federal and state cases across the country. Ms. Markey has extensive experience in Qui Tam litigation in the health care, defense and education industries, and has represented whistleblower clients in the public housing sector.

Ms. Markey is co-lead counsel in *United States of America et al., ex rel. Lauren Kieff, v. Wyeth*, a high-profile whistleblower case against pharmaceutical giant Wyeth (recently acquired by Pfizer). The lawsuit alleges that Medicaid, the healthcare program for the poor which is jointly funded by the federal and state governments, was defrauded when Wyeth falsely inflated the price of the acid suppression drug Protonix Oral from 2001 through 2006. Thirty-six states and the District of Columbia have joined with the United States to intervene in the Wyeth case – more states than have ever intervened in any other U.S. Qui Tam case.

She also served as the primary attorney representing the putative class in *Benzman v. Whitman*, a class action in Manhattan and Brooklyn against the U.S. Environmental Protection Agency. The claims were based on class members' exposure to contaminants contained in World Trade Center interior dust resulting from the 9/11 attacks.

Ms. Markey is admitted to practice law in the Commonwealth of Pennsylvania, the Eastern District of Pennsylvania and to the First Circuit Court of Appeals, Second Circuit Court of Appeals, and Eleventh Circuit Court of Appeals. She is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the Federal False Claims Act and its Qui Tam provisions, the Association of Qui Tam Attorneys, and frequently speaks about developments in the Qui Tam field. She received her B.A. (*cum laude*) from Colgate University and her J.D. from Cornell University Law School.

Christopher J. Cormier

Christopher J. Cormier is a Partner at Cohen Milstein and a member of the Antitrust practice group. In this role, he has tried cases and obtained settlements and judgments for his clients in excess of $1 billion. He is a member of the Antitrust practice group's New Case Committee as well as a member of the group's Client Committee.

Currently, Mr. Cormier is litigating the following notable matters:

- Anadarko Basin Oil and Gas Lease Antitrust Litigation: Co-lead counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies conspired to rig bids for leases of land held by private landowners in parts of Oklahoma and Kansas. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy. Plaintiffs allege that Defendants illegally conspired to stabilize and depress the price of royalty and bonus payments paid to landowners in the Anadarko Basin oil and gas province — a massive geological formation holding natural gas and oil deposits that includes large parts of Oklahoma and Kansas. Pursuant to this conspiracy, Plaintiffs allege that Defendants communicated about and agreed on prices, allocated particular geographic areas between themselves, and rigged bids for leases of land, lowering acquisition prices across the region and thereby harming the proposed class of landowners.
- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company — the three largest dental supply and dental equipment distributors in the United States — fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays. Mr. Cormier is one of the members of the Cohen Milstein team co-leading this case.
- Ductile Iron Pipe Fittings Antitrust Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs in a price-fixing case against the three largest manufacturers of ductile iron pipe fittings — McWane Inc., Sigma Corporation, and Star Pipe Products — and a monopolization case against McWane for excluding significant competition in the domestic ductile iron pipe fittings market. Settlements of $9 million have been reached with two of the defendants, Sigma and Star. Currently, Mr. Cormier and his team are in the midst of fact discovery and taking depositions of numerous party and non-party witnesses across the country.

- Cast Iron Soil Pipe & Fittings Antitrust Litigation: Cohen Milstein, as co-lead counsel, represents a putative class of direct purchaser plaintiffs against the two largest soil pipe and fittings manufacturers in the country (McWane Inc. and Charlotte Pipe & Foundry) and the trade association they control (Cast Iron Soil Pipe Institute) in a lawsuit alleging that the defendants engaged in a nationwide price-fixing conspiracy. Mr. Cormier and his team are concluding fact discovery, and have taken a significant number of depositions of party and non-party witnesses across the country.

His successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam, a basic component of ubiquitous everyday products such as bed mattresses, car seat cushioning and furniture cushioning. Four defendants — Bayer, BASF, Huntsman, and Lyondell — settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, in which Mr. Cormier was a member of the trial team, the jury returned a $400 million verdict for the plaintiffs, which the district court trebled under federal antitrust law to more than $1 billion. This was the largest verdict in the country in 2013, as reported by the National Law Journal. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment, which is currently on appeal before the United States Supreme Court.
- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein was co-lead counsel for direct purchaser plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin — life-saving therapies derived from blood plasma. Mr. Cormier and his colleagues at Cohen Milstein represented named plaintiff The University of Utah Health Systems as well as the remaining class members in this matter. The defendants were CSL Ltd., CSL Behring, Baxter Healthcare and the Plasma Protein Therapeutics Association (the trade association the manufacturer defendants controlled). Mr. Cormier played an integral role in the investigation and filing of the first complaint in the country in this matter. Following numerous depositions across the globe and the filing of plaintiffs' opening class certification motion and expert report, Mr. Cormier and his team obtained settlements with all defendants totaling $128 million.

Mr. Cormier earned a B.A. at the University of Virginia and attended American University Washington College of Law, graduating *magna cum laude*. He interned with the Hon. Judge Deborah K. Chasanow, U.S. District Court for the District of Maryland, and with the U.S. Department of Justice, National Criminal Enforcement Section, Antitrust Division. He is the author of numerous scholarly articles on antitrust law. Benchmark Plaintiff has named him an Antitrust Litigation Star three consecutive years, from 2013 to 2015 and Super Lawyers named him a "Rising Star" in 2016.

Michael B. Eisenkraft

Michael B. Eisenkraft is a Partner at Cohen Milstein and takes a leading role in prosecuting cases relating to the protection of commodity and financial markets for the firm and currently represents investors in the Natural Gas, KOSPI 200, LIBOR, Treasuries, and Interest Rate Swaps markets. He has also helped investors recover hundreds of millions of dollars in the Firm's mortgage-backed securities cases. Mr. Eisenkraft serves as the Administrative Partner for Cohen Milstein's New York office and chairs the firm's new business development committee.

His notable successes at Cohen Milstein include:

- HEMT MBS Litigation: $110 million settlement on behalf of investors in mortgage-backed securities issued and underwritten by Credit Suisse (final approval pending) after more than seven years of litigation, which included the first written decision certifying a Securities Act class of mortgage-backed securities in the country.
- RALI MBS Litigation: $335 million in settlements on behalf of investors in mortgage-backed securities issued by Residential Capital and underwritten by various investment banks after seven years of litigation.
- Harborview MBS Litigation: $275 million settlement on behalf of investors in mortgage-backed securities issued and underwritten by the Royal Bank of Scotland and its subsidiaries after more than six years of litigation.
- Dynex: $7.5 million settlement on eve of trial on behalf of investors in asset-backed securities. The decision certifying the class in the case was the first decision within the Second Circuit certifying a class of asset-backed bond purchasers under the 1934 Act.
- China MediaExpress: $12 million settlement with auditor defendant in case involving alleged fraud at Chinese reverse merger company China MediaExpress. One of the largest settlements with an auditor defendant in a case involving a Chinese reverse merger company.

Mr. Eisenkraft's current cases include:

- Total Gas & Power Antitrust and Commodities Litigation: Represents putative class in action against the energy company Total in case alleging antitrust violations and violations of the Commodity Exchange Act in connection with manipulation of the market for natural gas.
- NovaStar MBS Litigation: Securities Act litigation involving billions of dollars of mortgage-backed securities underwritten by the Royal Bank of Scotland, Wachovia and Deutsche Bank.
- Tower Research Capital: Commodity Exchange Act class action against a high frequency trading firm alleging manipulation of the market for KOSPI 200 futures contracts (the representative stock market index of South Korea) using spoofing or faked trades.
- LIBOR (Exchange Traded Class): Commodity Exchange Act and antitrust class action representing investors in Eurodollar futures injured by manipulation of LIBOR by world's largest banks.
- Interest Rate Swaps: Represents Public School Teachers' Pension and Retirement Fund of Chicago and putative class in action alleging that major investment banks conspired to prevent an exchange-traded market for interest rate swaps from developing.

Mr. Eisenkraft served as a law clerk to the Honorable Judge Barrington D. Parker of the United States Court of Appeals for the Second Circuit. He is the author or co-author of numerous articles on legal issues in the securities and antitrust fields among other subjects. Mr. Eisenkraft attended Brown University, where he received a B.A., *magna cum laud*e and Phi Beta Kappa, and graduated *cum laude* from Harvard Law School.

Michelle C. Yau

Michelle C. Yau is a Partner at Cohen Milstein, and a member of the Firm's Employee Benefits (ERISA) Practice Group. In her role, Ms. Yau represents the interests of employees, retirees, plan participants or beneficiaries in ERISA cases. Her practice specializes in ERISA cases involving complex financial transactions or actuarial issues. Ms. Yau brings to her practice government experience enforcing labor statutes and a grasp of complex

financial instruments gained from her training as a financial analyst. Drawing on those experiences, she is able to fulfill her passion for protecting pension plan participants.

Ms. Yau litigated some of the most significant ERISA lawsuits to emerge from the Madoff Ponzi scheme. In re Beacon Assoc. Litig., she represented a multi-plan class of participants, beneficiaries and fiduciaries, which settled along with other consolidated cases for $219 million in 2013, representing 70% of the Class members' out-of-pocket losses. The judge praised the settlement, describing the outcome as "extraordinary" and the praising the "hard work" done by plaintiffs' counsel, including Cohen Milstein. In re Austin Capital Mgmt. Litig., which was settled by the Department of Labor on the ERISA class on very favorable terms, Ms. Yau alleged that Madoff's returns, based on his advertised investment strategy, were mathematically impossible, a fact Austin Capital ought to have recognized well before the fraud was revealed.

Prior to joining Cohen Milstein in 2007, Ms. Yau was an Honors Program Attorney at the Department of Labor where she enforced and administered of a variety of labor statutes. Before law school, she worked as a financial analyst at Goldman, Sachs & Co. in the Financial Institutions Group of the Investment Banking Division.

Ms. Yau is presently litigating a series of church plan lawsuits alleging that health care systems wrongfully claim their benefit plans are exempt from ERISA's protection. She oversees the day-to-day management of these cases, including coordinating all the aspects of the litigation.

Currently, Ms. Yau is representing clients in the following notable matters:

- St. Peter's Health care System Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Kaplan v. St. Peter's Healthcare System, which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections. In district court, Cohen Milstein succeeded in showing that only a church may establish a church plan and thus St. Peter's Healthcare System is not entitled to exemption from ERISA. Cohen Milstein then prevailed in the Third Circuit, which affirmed the district court's holdings.
- St. Anthony Medical Center Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Owens et al. v. St. Anthony Medical Center et al., which allege that the Medical Center violated numerous provisions of ERISA by improperly operating the plan as exempt from ERISA's protections. As a result the class of participants suffered cutbacks as much as 40% of their promised benefits.
- Trinity Church Plan Litigation: Cohen Milstein is counsel to a class of defined benefit participants in Lann et al. v. Trinity Health, which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections,
- Advocate Health Care Church Plan Litigation: Cohen Milstein, along with Keller Rohrback, is counsel to a class of defined benefit participants in Stapleton et al. v. Advocate Health Care Network and Facilities et al., which allege that the hospital's plan is not a church plan and thus the class is entitled to ERISA's protections. In district court, counsel succeeded in showing that only a church may establish a church plan and thus Advocate is not entitled to exemption from ERISA. Plaintiffs then prevailed in the Seventh Circuit, which affirmed the district court's holdings.
- U.S. Bancorp Pension Plan Litigation: Cohen Milstein is counsel to a class of pension plan participants alleging that the plan's managers engaged in a risky, imprudent investment strategy by investing 100%

of its assets in stocks, thus causing the plan to lose more than $1 billion during the collapse of the equities market in 2008. Ms. Yau developed the litigation and is overseeing all aspects of the litigation.

Ms. Yau has litigated the following case successfully:

- Merrill Lynch ERISA Litigation: Cohen Milstein served as interim co-lead counsel in a class action alleging that fiduciaries of the Merrill Lynch retirement plans imprudently purchased and held inflated Merrill employer stock for the retirement accounts of the Companies' employees. The litigation was resolved for $75 million. Ms. Yau was engaged in all aspects of the litigation.
- Madoff Ponzi Scheme Litigation: Cohen Milstein represented a multi-plan class of participants, beneficiaries and fiduciaries in re Beacon Assoc. Litig. The $219 million settlement in 2013 represented 70% of the Class members' out-of-pocket losses. Ms. Yau was engaged in all aspects of the litigation.
- Weyerhauser Pension Plan Litigation: Cohen Milstein was lead counsel in a lawsuit alleging that the Weyerhaeuser Company caused its Defined Benefit Retirement Plans to engage in a risky investment strategy involving alternative investments and derivatives, causing the Plans' master trust to become underfunded. A settlement was reached for injunctive relief on behalf of Plans' participants and beneficiaries. Ms. Yau was engaged in all aspects of the litigation.

Ms. Yau received her law degree from Harvard Law School in 2003, where she was awarded several public interest fellowships, including the Heyman Fellowship for academic excellence and a demonstrated commitment to federal public service. Ms. Yau graduated Phi Beta Kappa with a B.A. in Mathematics from the University of Virginia. Ms. Yau was also selected as an Echols Scholar and awarded the Student Council Scholarship for leadership, academic achievement and community service. Law360 named Ms. Yau a Rising Star Under 40.

George F. Farah is a Partner at Cohen Milstein, and a member of the Antitrust and Human Rights practice groups. In this role, Mr. Farah represents consumers, farmers, unions and businesses that were injured by antitrust abuses in complex multi-district class action lawsuits.

He has experience in litigating all aspects of cases, from arguing motions in court to engaging in settlement negotiations to obtaining jury trial verdicts. In addition, Mr. Farah facilitates the development of new antitrust cases by investigating potential matters and securing clients to serve as class representatives.

Since joining the Firm in 2005, Mr. Farah has represented small businesses that were overcharged due to price-fixing conspiracies; unions and consumers in actions against pharmaceutical companies that thwarted generic competition; and farmers in lawsuits against processors that artificially depressed their wages. Mr. Farah has also advocated for victims of other tortious conduct. He represented the city of Milwaukee in a public nuisance case against lead paint manufacturers; survivors of the Holocaust in actions against companies who profited from Nazi-era slave labor; and political asylum applicants who were tortured in Nepal.

In addition to litigating, Mr. Farah has worked on electoral reform and income inequality issues. He founded the nonprofit Open Debates to improve the presidential debate process. He served as general counsel of The Living Wage Campaign to raise wages in Virginia. He reported on the harms of media concentration and the IMF's austerity programs at The Center for the Study of Responsive Law.

Currently, Mr. Farah is litigating the following notable matters:

- DairyAmerica Antitrust Litigation: Cohen Milstein is co-lead counsel in in Carlin v. Dairy America, Inc.(E.D. Cal.), accusing the largest marketer of nonfat dry milk in the U.S. and the California-based milk processing firm of inflating their profits at the expense of U.S. dairy farmers by misreporting data used by the U.S. government to set the price of raw milk. Mr. Farah is managing all aspects of the case. The case is ongoing.
- Treasury Securities Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit alleging that major banks and brokerages conspired to drive up futures prices for Treasury securities ahead of announced auctions and then colluded to deflate prices at auction. Mr. Farah is involved in all aspects of the case.
- In re Nexium Antitrust Litigation (D. Mass.): Cohen Milstein is co-lead counsel in a pay-for-delay litigation alleging that AstraZeneca PLC, the brand manufacturer of Nexium, paid generics manufacturers to delay the introduction of a generic version of the drug, thus harming consumers. The case is on appeal.
- In re Lidoderm Antitrust Litigation (N.D. Cal.): Cohen Milstein is co-lead counsel in a class action lawsuit alleging that Endo and Teikoku, the manufacturers of the Lidoderm pain patch, paid Watson Pharmaceuticals to delay its generic launch. The case is ongoing.

Some of his successes include:

- OSB Antitrust Litigation: $120 million settlement. Cohen Milstein was co-lead counsel in a case alleging that the nine producers of oriented standard board conspired to reduce the supply of OSB so as to increase prices. Mr. Farah was involved in all aspects of the litigation.
- Hydrogen Peroxide Litigation: $100 million settlement. Cohen Milstein was co-lead counsel in In re Hydrogen Peroxide Antitrust Litigation (E.D. Pa.) representing a class of direct purchasers of hydrogen peroxide in alleging a price-rigging conspiracy by manufacturers. The U.S. Third Circuit Court of Appeals opinion in Hydrogen Peroxide has proved important in clarifying the role of expert testimony in Rule 23 analysis. Mr. Farah was engaged in all aspects of the litigation.
- Northeast Dairy Litigation: In Allen vs. Dairy Farmers of America (D. Vt.), Cohen Milstein serves as lead counsel for one of two certified subclasses of Northeast dairy farmers against Dairy Farmers of America and Dairy Marketing Services in a raw milk price-fixing case. Defendant Dean Foods Co. settled for $30 million, and the Court has preliminarily approved a $50 million settlement with DFA and DMS.
- Nepali Nurse Political Asylum Litigation (Pro Bono): Mr. Farah acted as lead counsel in successfully securing political asylum in the U.S. for a Nepali nurse who had been persecuted and tortured for her religious beliefs in Nepal.

Mr. Farah is the author of the book "No Debate: How the Republican and Democratic Parties Secretly Control the Presidential Debates" (Seven Stories Press). His articles on legal and electoral issues have appeared in *The Washington Post, The Boston Globe, The Philadelphia Inquirer, Antitrust Magazine* and other publications.

Mr. Farah has appeared on over 50 television programs to discuss political, electoral and legal matters, including Nightline, NOW with Bill Moyers, 20/20, CBS Evening News, NBC Nightly News, FOX and Friends, Lester Holt Live and CNN's Market Call. He has been interviewed on over 100 radio shows and has hosted numerous televised press conferences. He has given several talks on the political process and electoral reform issues at colleges and universities.

Mr. Farah attended Princeton University, graduating with a B.A. from the Woodrow Wilson School of Public and International Affairs, and earned a J.D. at Harvard Law School. Mr. Farah was the recipient of a Paul and Daisy Soros Fellowship.

Kalpana Kotagal

Kalpana Kotagal is a Partner at Cohen Milstein, a member of the firm's Civil Rights & Employment practice group, and Chair of the firm's Hiring and Diversity Committee. Ms. Kotagal also plays an active role in the investigation and development of new potential matters for the Civil Rights & Employment practice group.

Ms. Kotagal has represented victims of discrimination in the workplace and in other settings. Ms. Kotagal also practiced as a member of the firm's Antitrust practice group. A noted speaker, Ms. Kotagal often is called on to address issues of opportunities and impediments to women's leadership, the ethics of multi-party and class cases, and class arbitration. She also speaks regularly to law students and new lawyers about their career paths.

Ms. Kotagal represents a class of approximately 44,000 female sales employees nationwide in a Title VII and Equal Pay Act case against one of the nation's largest jewelry chains in *Jock, et al. v Sterling Jewelers Inc*. Her clients have alleged a pattern of sex discrimination in compensation and promotions. This case presents cutting-edge issues regarding the certification of nationwide classes and litigating in arbitration. Ms. Kotagal also represents transgender beneficiaries of federal health insurance who have challenged the denial of transition-related care as discriminatory.

Ms. Kotagal's past successes include:

- U.S. Postal Service Disabled Veterans Litigation: Ms. Kotagal represented a class of disabled veteran applicants in *Hill, et. al v. Donohue, United States Postal Service*, alleging illegal pre-offer medical inquiries during the application process against the United States Postal Service. The case, which settled for $9.58 million, resulted in USPS's agreement implement changes in its practices to prevent similar violations in the future.
- Pilgrim's Pride Corporation: Ms. Kotagal represented 8,000 workers in 11 states in a wage and hour lawsuit in *Aaron v. Pilgrim's Pride Corp.*, seeking redress for unpaid overtime. The $10 million settlement allowed class members to recover about 85% of the back pay owed them.
- Nurse Wages Matters: Cohen Milstein represented nurses in an antitrust case in a case contending that hospitals conspired to suppress and fix wages of nurses.

Ms. Kotagal is a member of the Center for Worklife Law's Working Group on Pregnancy Accommodation of the National Employment Lawyers Association (NELA). She is also the co-author of "Innovation, Economics and the Law: The Health Care Industry's Exposure to Antitrust Liability," published by the ABA Antitrust Law Section in 2007.

Ms. Kotagal brings to her litigation practice her experience as an organizer, having previously served as field organizer with Green Corps, an Assistant National Field Director of the United States Public Interest Research Group, and as an advisor to a Congressional candidate in 2006. Ms. Kotagal also served as an honorary chair of the National Finance Committee of Young Lawyers for Obama in 2008.

While in law school, Ms. Kotagal served as law clerk in the Chambers of the Honorable J. Curtis Joyner, Eastern District of Pennsylvania. She served as an Articles Editor of the *University of Pennsylvania Law Review*.

Prior to joining Cohen Milstein, she served as a law clerk to the Honorable Betty Binns Fletcher of United States Court of Appeals for the Ninth Circuit.

Ms. Kotagal attended Stanford University, where she was a Morris K. Udall Scholar, and graduated with honors with an A.B.B.S. She earned her J.D. *cum laude* from the University of Pennsylvania, where she was a James Wilson Fellow.

Sharon K. Robertson

Sharon Robertson is a Partner at the firm and a member of the Antitrust practice group. Ms. Robertson Co-chairs the firm's Professional Development and Mentoring Committee and serves on the firm's Diversity Committee. Ms. Robertson also currently serves as a member of the Executive Committee for the Antitrust Section of the New York State Bar Association.

Ms. Robertson, who joined Cohen Milstein in 2006, has extensive experience in complex antitrust litigation at the pre-trial, trial and appellate levels and has been consistently recognized as a leading and highly regarded attorney. Within a span of two years, Ms. Robertson was a trial team member in two of the largest antitrust cases to be tried to verdict. In 2013, she was a member of the trial team in the Urethanes matter, where the jury returned a $400 million verdict, which was trebled by the Court, as required by antitrust law, to $1.06 billion. The judgment, one of the largest known antitrust verdicts to date, was cited by *The Legal 500* in ranking Cohen Milstein a leading class action plaintiff firm in 2015. The following year, Ms. Robertson was a member of the trial team in the Nexium matter, the first pharmaceutical antitrust case to go to trial following the Supreme Court's landmark decision in *FTC v. Actavis*, 570 U.S. 756 (2013).
Currently, Ms. Robertson leads a series of pay-for-delay pharmaceutical antitrust cases, alleging that the defendant brand manufacturer entered into non-competition agreements with generic pharmaceutical manufacturers in order to delay market entry of generic versions of certain drug products.

Ms. Robertson represents End-Payor Plaintiffs in the following pay-for-delay pharmaceutical antitrust cases in which the firm serves as Co-Lead Counsel:

- *In re Nexium Antitrust Litigation* (D. Mass.): Plaintiffs allege that AstraZeneca PLC, the brand manufacturer of Nexium, paid generics manufacturers to delay the introduction of a generic version of the drug, thus harming consumers and other end-payors. The case is on appeal.
- *In re Lipitor Antitrust Litigation* (D.N.J): Plaintiffs allege that Pfizer, the manufacturer of Lipitor, conspired with Ranbaxy, the generic manufacturer, to delay its introduction of a generic Lipitor product. The case is on appeal.
- *In re Loestrin Antitrust Litigation* (D.R.I.): Plaintiffs allege that Warner Chilcott PLC and three others entered into an agreement to delay the introduction of a generic version of the contraceptive drug Loestrin. Following a dismissal by the District Court, the First Circuit recently revived all of Plaintiffs' claims and remanded the case for further proceedings consistent with its opinion.
- *In re Lidoderm Antitrust Litigation* (N.D. Cal.): Plaintiffs allege that Endo and Teikoku, manufacturers of the Lidoderm patch, paid Watson Pharmaceuticals to delay its generic launch. The case is ongoing.

In addition, Ms. Robertson serves as a member of the executive committee in similar pay-for-delay cases in which Cohen Milstein plays a significant role, including: Niaspan (*In re Niaspan Antitrust Litigation* [E.D. Pa.]), Suboxone (*In re Suboxone Antitrust Litigation* [E.D. Pa.]), ACTOS (*In re ACTOS Antitrust Litigation* [S.D.N.Y.]),

Aggrenox (*In re Aggrenox Antitrust Litigation* [D. Conn.]) and Solodyn (*In re Solodyn Antitrust Litigation* [D. Mass.]).

Ms. Robertson has successfully litigated the following notable matters:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is Co-Lead Counsel in an antitrust class action alleging a nationwide conspiracy to fix the prices of polyether polyols. Ms. Robertson played a leading role in helping obtain settlements with several defendants for $139 million and was a member of the trial team that obtained a $400 million jury verdict (trebled to more than $1 billion), which was affirmed on appeal by the 10th Circuit. The case against Dow ultimately settled for $835 million while Dow's petition for certiorari was pending before the Supreme Court.
- Albany and Detroit Nurses Litigation: Cohen Milstein represented registered nurses employed by hospitals in Albany and Detroit in class actions alleging a wage-fixing conspiracy. Ms. Robertson obtained settlements with five Albany Defendants totaling over $14 million. In the Detroit case, Ms. Robertson helped obtain $98 million in settlements with eight Defendants.
- Indonesian Villagers Litigation: Ms. Robertson represented Indonesian villagers in a lawsuit against Exxon Mobil over torture and extrajudicial killings allegedly committed by the Defendant's security forces (a unit of the Indonesian military).

Ms. Robertson attended the State University of New York at Binghamton, where she graduated*magna cum laude* with a B.A. in Philosophy, Politics and Law. She earned her J.D. from the Benjamin N. Cardozo School of Law, where she served as Notes Editor of the *Cardozo Public Law, Policy and Ethics Journal*.
Ms. Robertson has authored "Comparing the U.S. Class Action Mechanism and the Proposed U.K. System: Which Strikes the Right Balance Between Safeguards and Justice," *Competition Policy International Antitrust Chronicle*. In addition, she assisted the Trial Practice Committee of the American Bar Association in revising the 2005 Edition of the *Model Jury Instructions* handbook.

Prior to attending law school, Ms. Robertson worked on the campaign committee of Councilman John Liu, the first Asian American to be elected to New York City's City Council. During law school, she was an intern in the Litigation Bureau of the Office of the New York State Attorney General and the United States Court of Appeals for the Second Circuit. Additionally, in law school, Ms. Robertson was selected as an Alexander Fellow and spent a semester serving as a full-time Judicial Intern to the Hon. Shira A. Scheindlin, U.S. District Court for the Southern District of New York.

S. Douglas Bunch

S. Douglas Bunch, is a Partner at Cohen Milstein and a litigator in the firm's Securities Fraud & Investor Protection Practice Group.

Mr. Bunch represents individual and institutional investors in cases brought in violation of state and federal securities laws, including the Securities Act of 1933 and the Securities Exchange Act of 1934. Currently, Mr. Bunch is part of the Cohen Milstein team litigating a class action suit against Harman International Industries, Inc., in which Cohen Milstein was successful in obtaining a ruling by the Court of Appeals for the D.C. Circuit reversing the dismissal of the case and remanding it to the U.S. District Court for further proceedings. The ruling protects investors by limiting the scope of protection afforded by the so-called "safe-harbor" for forward-looking statements in the Private Securities Litigation Reform Act of 1995. Mr. Bunch also recently

played a key role in the litigation and settlement of securities class actions against ITT Educational Services, Inc. and Orthofix International N.V., in which the U.S. District Court for the Southern District of New York denied defendants' motions to dismiss.

Mr. Bunch played an important role in successfully litigating the suits that followed in the wake of the 2008 financial crisis. He was instrumental in the $90 million settlement, following an appeal to the U.S. Court of Appeals for the Second Circuit, of Rubin v. MF Global, Ltd. in 2011. The complaint asserted that although MF Global had assured investors in its IPO that the Company had a rigorous, robust system of risk controls in place capable of monitoring risk on a continuous "real time" basis, MF Global in fact had deactivated trading and margin controls on brokers' computers to speed up transaction times. He was also a member of the litigation team that persevered in the $335 million global settlement of a class action lawsuit on behalf of purchasers of mortgage-backed securities (MBS) issued by Residential Accredit Loans, Inc. (RALI), the $275 million settlement of a class action lawsuit on behalf of purchasers of MBS issued by Harborview Mortgage Loan Trusts, and the $500 million settlement of a class action lawsuit on behalf of purchasers of MBS issued by Bear Stearns & Co. Inc., among other MBS cases.

A member of Phi Beta Kappa, Mr. Bunch graduated with a B.A., *summa cum laude*, from the College of William & Mary, earned an Ed. M. from Harvard University, and received his J.D. from William & Mary Law School, where he was a recipient of the Benjamin Rush Medal in 2006. In 2011, he was awarded William & Mary's inaugural W. Taylor Reveley III award, recognizing alumni who have demonstrated a sustained commitment to public service. Mr. Bunch is co-founder and chairman of Global Playground, Inc., a nonprofit that builds schools in the developing world, and serves or has served on the boards of the Northeast Conference on the Teaching of Foreign Languages, Ascanius: The Youth Classics Institute, and Virginia21.

David Young

David A. Young is a Partner at Cohen Milstein and is a member of the Antitrust Practice Group, having joined the Firm in 2010. Mr. Young has extensive experience in complex antitrust litigation, class actions, appeals and litigating cases under the federal False Claims Act.

In his role, Mr. Young represents businesses and individuals in federal and state civil actions, with a focus on multi-district class actions and federal False Claims Act litigation. He has worked on antitrust issues in numerous industries, including pharmaceuticals, financial services, financial derivatives and PC microprocessors. Mr. Young also represents qui tam relators in federal False Claims Act litigation.

Prior to joining Cohen Milstein, Mr. Young practiced at two other firms where his litigation practice focused on antitrust, trademark, business, and False Claims Act litigation. He represented the relator in U.S. ex rel. Loughren v. UnumProvident Corp. (D. Mass), where a jury found that UnumProvident violated the False Claims Act by causing the submission of false claims for Social Security disability benefits. Mr. Young also represented U.S. trademark holders suing to prevent the illegal importation of products bearing their marks in federal court and administrative actions.

Currently, Mr. Young is litigating the following notable matters:

- Automotive Parts Antitrust Litigation: In In re Automotive Parts Antitrust Litigation (E.D. Mich.), Cohen Milstein represents direct purchasers of wire harnesses, bearings and other automotive parts, who

were overcharged as a result of price-fixing and bid-rigging conspiracies by various sets of defendants throughout the automotive parts industry for more than a decade. The litigation follows upon a U.S. Department of Justice price-fixing case against auto parts manufacturers.

- Domestic Drywall Antitrust Litigation: Cohen Milstein is co-lead counsel in antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices and restrain price competition. To date, settlements for $44.5 million have been reached with two of the defendants. Mr. Young has been a core member of the team, involved in all aspects of the litigation. Defendants' motions for summary judgment were recently denied for all but one defendant, and the case is ongoing.
- Google Wiretap Antitrust Litigation: Cohen Milstein is co-lead counsel in a nationwide class action lawsuit alleging Google violated the Wiretap Act when its StreetView vehicles collected data from unencrypted Wi-Fi networks, including the home networks of individuals. The litigation has survived a motion to dismiss, which Google unsuccessfully appealed on an interlocutory basis in the Ninth Circuit. Currently, the firm is in the midst of jurisdictional discovery. The case is ongoing.

His successes include:

- Community Health Care System Litigation: Cohen Milstein was co-counsel representing an emergency room doctor and nurses in a whistleblower lawsuit under the False Claims Act alleging Community Health Care System defrauded the federal government in connection with health care bills. The case was resolved for $94 million.
- Hy-Ko Products Antitrust Litigation: Cohen Milstein represented Hy-Ko Products Co., a manufacturer of replacement keys and key replacement machines, in an antitrust litigation alleging that its competitors, the manufacturer of replacement keys and the manufacturer of key replacement machines, had acted to restrain competition and to monopolize the market. The litigation was resolved to the client's satisfaction.

Mr. Young attended Bridgewater College, where he graduated with a B.A. in Physics, and earned his J.D. from Harvard Law School, where he served as an Executive Editor for the Harvard Civil Rights-Civil Liberties Law Review. While still in law school, he represented clients in disability and discrimination cases as a member of Harvard's clinical programs, worked as a research assistant for Professor Christine Jolls and volunteered as a summer legal intern at the Whitman-Walker Clinic, a community-based center providing a range of health care services in Washington, D.C.

Mr. Young is a member of the ABA Section of Antitrust Law. He has represented pro bono clients in discrimination actions before the D.C. Circuit and D.C. District courts, including successfully arguing for reversal of the district court's dismissal of his client's case in Miller v. Hersman, 594 F.3d 8 (D.C. Cir. 2010).

Laura Alexander

Laura Alexander is a Partner in the Antitrust practice at Cohen Milstein. Ms. Alexander joined the firm in 2012, bringing with her extensive experience in complex antitrust litigation, class actions and appeals. Prior to joining Cohen Milstein, Ms. Alexander also was a member of the trial team that successfully represented Charter Communications in what was, at the time, the largest litigated bankruptcy in U.S. history and successfully represented several clients before the United States Supreme Court.

Currently, Ms. Alexander is litigating the following notable matters:

- *Ideker Farms, et al. v. the United States of America:* Cohen Milstein represents Ideker Farms and another 350 plaintiffs located in six states along the Missouri River in a mass action lawsuit in the U.S. Court of Federal Claims alleging that the federal government took land and flooding easements over lands owned by farmers, violating the takings clause of the Fifth Amendment. Ms. Alexander has been involved in all aspects of the litigation. The case is set to go to trial in 2017.
- Sutter Health Antitrust Litigation: Cohen Milstein is co-lead in a monopolization case alleging Sutter Health, a large hospital chain in Northern California, has used anticompetitive contract terms and contracting practices to drive out competition and raise prices to insurers, self-insured employers and individual consumers to supracompetitive levels. Ms. Alexander has been involved in all aspects of the litigation.
- *Big Oak Farms, Inc. v. the United States of America:* Cohen Milstein represents a group of farmers along the Mississippi River in a Fifth Amendment takings case alleging that the U.S. Army Corps of Engineers intentionally flooded plaintiffs' land, without providing just compensation. Ms. Alexander has been involved in all aspects of the litigation.

Ms. Alexander's past successes include:

- Urethanes (Polyether Polyols) Antitrust Litigation: Cohen Milstein is co-lead counsel for direct purchaser plaintiffs in an antitrust class action alleging a nationwide conspiracy to fix the prices of chemicals used to make polyurethane foam. Four defendants—Bayer, BASF, Huntsman, and Lyondell—settled for a total of $139.5 million, while the case against the fifth manufacturer, Dow Chemical, went to trial. After a four-week jury trial, the jury returned a $400 million verdict for the plaintiffs, which the district court trebled under federal antitrust law to more than $1 billion. Ms. Alexander was a member of the trial team and had significant brief writing and witness preparation responsibilities. The U.S. Court of Appeals for the Tenth Circuit affirmed the judgment. Dow has petitioned the United States Supreme Court for review, and that petition is currently pending.

Ms. Alexander attended Reed College, earning a B.A. in Mathematics, and earned her J.D. *magna cum laude* from Georgetown University Law Center. Following law school, she served as a law clerk to the Honorable Judge M. Margaret McKeown on the United States Court of Appeals for the Ninth Circuit. She has authored or co-authored scholarly articles, including Prominent Market Definition Issues in Pharmaceutical Antitrust Cases, which recently appeared in *Antitrust*, an American Bar Association publication.

Emmy Levens

Emmy L. Levens, a Partner in the Firm's Washington, D.C. office, is a member of the Antitrust Practice Group. With nearly a decade of experience, Ms. Levens has particular expertise in complex antitrust litigation, class actions, and appellate litigation. Ms. Levens plays a central role in helping the antitrust group evaluate potential cases and chairs the Firm's Summer Associate Committee.

Currently, Ms. Levens is litigating the following notable matters:

- Flint Water Crisis: Ms. Levens represents a group of residents and businesses in Flint, Michigan, in a suit for damages sustained as a result of their exposure to toxic levels of lead and other bacteria. This important case is ongoing in the Eastern District of Michigan.
- Resistors Antitrust Litigation: Cohen Milstein serves as interim co-lead counsel in a proposed class action accusing the world's largest manufacturers of resistors of fixing prices. As a critical member of the team of lawyers representing the proposed class of direct purchasers, Ms. Levens has been involved in every aspect of the case from investigation to prosecution of the class's case which is currently ongoing in the Northern District of California.
- Truck Transmissions Antitrust Litigation: Cohen Milstein serves as co-lead counsel in a putative class action alleging Eaton – the largest manufacturer of Class 8 Transmissions in the United States – conspired with manufacturers of Class 8 Trucks to exclude a rival transmission manufacturer from the market. Ms. Levens has played an important role on the case from the beginning and has recently returned to the case to assist with the appeal.
- Northeast Dairy: In Allen vs. Dairy Farmers of America (D. Vt.), Cohen Milstein serves as lead counsel for one of two subclasses of dairy farmers challenging anticompetitive conduct in the Northeast which resulted in lower prices paid to farmers. Ms. Levens has served as one of the principle attorneys litigating this matter since its inception. To date, the case has recovered a historic settlement with former defendant Dean Foods Company and another settlement for $50 million in addition to industry-changing equitable relief has recently been preliminarily approved by the Court.

Some of her past successes include:

- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein served as co-lead counsel for plaintiffs alleging that the two largest manufacturers of IVIG and Albumin – life-saving therapies derived from blood plasma – conspired to reduce the supply, and increase the prices, of these therapies. Ms. Levens played an active role in the litigation, helping to obtain settlements totaling $128 million for hospitals and other direct purchasers.
- Bulk Bleach Litigation: Ms. Levens served as one of the key attorneys at Cohen Milstein representing a class of municipalities and other direct purchasers of bulk bleach in a case alleging that the two dominant manufacturers of bulk bleach in the Carolina's engaged in an illegal market allocation agreement. After successfully defeating multiple motions to dismiss, class counsel obtained a settlement that satisfied nearly all of the class's damages. In approving the settlement, Judge Gergel complimented counsel, stating that the, "whole case has been, I think, very professionally handled, skillfully handled."
- Asylum Appeal: Ms. Levens agreed to represent pro bono a Nepalese woman after her initial application for asylum was denied. The woman had previously advocated for democratic reforms in Nepal but was forced to leave her home country to escape Communist militias. Ms. Levens appealed the matter through two rounds of briefing to the Board of Immigration Appeals and up to the Fourth Circuit Court of Appeals. After successfully obtaining a new asylum hearing for her client, Ms. Levens negotiated an agreement that allowed her client to remain safely in the United States.

Ms. Levens was also a member of the Apple price-fixing litigation team recognized as "Legal Lions" by Law360. In addition to her work at the Firm, Ms. Levens has served as an adjunct Professor at Georgetown School of Law and is a Board member and Secretary of Global Playground, a nonprofit that builds schools in the developing world. She recently co-authored an article entitled, "Heightened Ascertainability Requirement Disregards Rule 23's Plain Language," which appeared in the Spring, 2016 issue of Antitrust magazine.

Prior to joining the firm, Ms. Levens worked as a staff law clerk at the U.S. Court of Appeals for the Seventh Circuit.

Ms. Levens attended the University of Kansas, graduating with honors, and earned her J.D. at UCLA Law School, graduating Order of the Coif. While at law school, Ms. Levens served as the Managing Editor for the UCLA Journal of Environmental Law and Policy, Director of the Downtown Legal Housing Clinic, and President of Moot Court.

Laura H. Posner

Laura H. Posner is a Partner at Cohen Milstein and a member of the firm's Securities Litigation & Investor Protection Practice Group.

Prior to joining the firm, Ms. Posner was appointed by the New Jersey Attorney General to serve as the Bureau Chief for the New Jersey Bureau of Securities – the top Securities Regulator for the State of New Jersey. In that capacity, Ms. Posner was responsible for administrating and enforcing the New Jersey Uniform Securities Law and regulations thereunder, as well as managing and overseeing the employees who staff the Bureau of Securities. Cases prosecuted under Ms. Posner's direction as Bureau Chief resulted in hundreds of millions of dollars in recoveries for New Jersey residents, as well as more than 20 criminal convictions. As Bureau Chief, Ms. Posner collaborated extensively with the Securities and Exchange Commission, the Department of Justice, and other state Attorneys General and securities regulators.

Previous to her appointment as Bureau Chief, Ms. Posner prosecuted securities fraud class actions and derivative actions on behalf of public pension funds, institutional investors, and unions nationwide, successfully recovering billions on behalf of defrauded investors, a role that she will continue at Cohen Milstein. Her notable successes include:

- *In re Schering-Plough Corp./ENHANCE Securities Litigation and In re Merck & Co., Inc. Vytorin/Zetia Securities Litigation*: Obtained $688 million for investors on the eve of trial, the third largest recovery ever achieved in the Third Circuit and District of New Jersey, the second largest securities fraud settlement ever against a pharmaceutical company and among the top 25 securities fraud settlements of all time.
- *In re The Mills Corporation Securities Litigation*: Obtained $202.75 million for investors, the largest recovery ever achieved in a securities class action in Virginia, and the second largest recovery ever in the Fourth Circuit.
- *In re WellCare Health Plans, Inc. Securities Litigation*: Obtained $200 million for investors, the largest recovery ever achieved in a securities class action in Florida, and the second largest recovery in the Eleventh Circuit.
-

Ms. Posner is the former Chairwoman of the North American Securities Administrators Association (NASAA) Enforcement Section Committee, and previously served on NASAA's Multi-Jurisdictional Action Committee, Technology Committee and State Legislation Committee. She also has served as a member of multiple committees of the Association of the Bar of the City of New York, including currently serving as a member of the Securities Litigation Committee, and previously serving as a member of the Securities Regulation and Consumer Affairs Committees.

Ms. Posner has regularly been named by *Super Lawyers* as a Rising Star and a Top Woman Attorney. She regularly speaks at conferences throughout the country, including for events sponsored by PIABA, FINRA, SIFMA, NASAA, SEC, the New York, New Jersey and Philadelphia Bar Associations and the ABA. Ms. Posner has been quoted in *The New York Times*, *The Wall Street Journal*, the *Star-Ledger*, NewJersey.com, *Asbury Park Press*, the *New Jersey Herald*, and *The Record*, and interviews with her appear on various cable news channels and in various publications.

Ms. Posner graduated with a B.A. in Political Science, *magna cum laude*, from the University of California, Los Angeles in 2001. She received her law degree at Harvard Law School in 2004, where she served on the Executive Editorial Committee for the Harvard *Women's Law Journal*.

Attorney Profiles – Of Counsel & Associates

Elizabeth Aniskevich

Elizabeth Aniskevich is an Associate at Cohen Milstein and a member of the firm's Securities Fraud & Investor Protection practice group. Prior to joining the firm in 2012, Ms. Aniskevich served as the Pro Se Clerk at the United States District Court for the Eastern District of Virginia in Alexandria, where she managed the pro se prisoner dockets of the seven district court judges.

Ms. Aniskevich has successfully litigated the following notable matters:

- IntraLinks: $14 million settlement. Cohen Milstein was lead counsel in the class action securities fraud litigation, which asserted violations of both the Securities Act and the Exchange Act. Ms. Aniskevich was involved in the class certification briefing and played a critical role in fact discovery, which included preparing for and taking more than 20 depositions and propounding extensive written discovery.
- Ebix Derivative Litigation: Lead counsel in a derivative lawsuit alleging questionable tax schemes and breach of fiduciary duty on the part of Ebix's board of directors in misrepresenting the company's financial results, organic growth, and internal controls over financial reporting. Ms. Aniskevich's role in the Ebix litigation included drafting the operative complaint. The litigation, which recently settled, resulted in the adoption of corporate governance measures including the appointment of a Lead Independent Director, increasing the number of directors on the corporate governance committee, and creating a director of audit and director of internal tax positions to report directly to the Audit Committee.
- ITT Educational Services Securities Litigation: $16.96 million settlement. Cohen Milstein was lead counsel in a class action lawsuit against ITT Educational Services and two officers for alleged material misrepresentations and omissions concerning ITT's liabilities under certain risk-sharing agreements it had entered into with third-party student lenders of ITT student loans. Ms. Aniskevich wrote the complaint and opposed the motion to dismiss.

She is currently litigating:

- Intuitive Surgical Inc. Derivative Litigation: A derivative lawsuit against Intuitive Surgical's directors and officers, asserting insider trading by officers and directors of Intuitive in connection with the cover-up of safety defects in the company's flagship product, the da Vinci robotic surgery system. Ms. Aniskevich has briefed numerous procedural motions in what has been a long, hard-fought legal battle. She is currently involved in fact discovery.

Ms. Aniskevich earned her B.A. at the University of Florida, graduating valedictorian of the College of Liberal Arts and Sciences, and received her J.D from American University's Washington College of Law, graduating *magna cum laude*, Order of the Coif. She interned at Cohen Milstein while in law school and was a Senior Staff Member of the *American University Law Review* and served as a Research Assistant to her criminal law professor, Professor Ira P. Robbins. She was the recipient of the Clair A. Cripe award for outstanding performance in correctional law.

Luke Bierman

Luke Bierman is Of Counsel to Cohen Milstein, and adviser to the Firm's Ethics and Fiduciary Counseling and Securities Litigation & Investor Protection practice groups. Mr. Bierman's role is to counsel pension funds and public entities on fiduciary, ethics, governance and compliance issues. He joined Cohen Milstein in 2011, bringing with him a singular perspective and substantive experience as in-house counsel to one of the leading pension funds in the country, appointments to state task forces to review the state code of judicial ethics and professionalism, and a scholarly and academic background as the Dean and Professor of Law at a rising law school that President Bill Clinton has called "interesting and innovative." His experience provides him with a unique context for assisting public pension funds at critical and challenging times for those funds, and to offer collaborative and creative solutions.

Mr. Bierman served from 2007 to 2010 as General Counsel for the Office of the New York State Comptroller, the sole trustee of the state's then $150 billion pension fund and the state's chief fiscal officer for the state of New York's then $130 billion budget. This was during the period when the Office of the Comptroller faced unprecedented challenges including an international placement agent scandal and the Great Financial Crisis, and Mr. Bierman led the review of policies and procedures in the Office. In this role, Mr. Bierman managed a legal staff that included 55 attorneys, and was responsible for legal advice and counsel on all matters relating to the comptroller's constitutional and statutory responsibilities, including fiduciary, governance, ethics, litigation, investment, pension benefits, state and municipal finance and legislative matters. He also managed the 35 outside law firms that represented the Comptroller in litigation and transactional matters.

Mr. Bierman is a noted expert on legal ethics and professionalism, who has spoken and written widely about state courts and judicial conduct. He currently serves as a member of the North Carolina Commission on Administration of Law and Justice and on the North Carolina Chief Justice's Commission on Professionalism. He was a member of the Massachusetts Supreme Judicial Court's Task Force on the Code of Judicial Conduct, which was assigned to review and suggest updates to the Court. He served on the ABA Presidential Task Force on Financing Legal Education and the ABA Presidential Task Force on Legal Access JobCorps. While working at the American Bar Association, Mr. Bierman initiated the project that resulted in revisions to the Model Code of Judicial Conduct (2007), which many states have since adopted.

Mr. Bierman is the Dean and Professor of Law at Elon University School of Law in Greensboro, North Carolina, an innovative law school that blends the most important traditional elements of legal education with highly experiential learning in the nation's first 2½ year JD program. Previously, Mr. Bierman was the Associate Dean for Experiential Education and Distinguished Professor of Practice of Law at Northeastern University School of Law in Boston, where he was responsible for Northeastern's Cooperative Legal Education Program.

Earlier in his career, Mr. Bierman served as a Fellow in Government Law and Policy at Albany Law School. He also has served as Director of the Institute for Emerging Issues at North Carolina State University, where he held the rank of Associate Professor of Political Science; as Founding Director of the Justice Center and Special Assistant to the President of the American Bar Association; as Visiting Specialist in Constitutional Law with the rank of Associate Professor at The Richard Stockton College of New Jersey; and as law clerk to the Presiding Justice and an Associate Justice as well as Chief Attorney of the New York Supreme Court, Appellate Division, Third Department. Mr. Bierman also has taught at Northwestern University School of Law, the University at Albany and Trinity College in Hartford.

Mr. Bierman is widely published for his legal analysis and is a frequent lecturer and commentator about corporate governance reform, fiduciary responsibility and ethics and justice reform. He was a member of the board of directors of the Council of Institutional Investors, where he co-chaired the policies committee.

Mr. Bierman earned his Ph.D. and M.A. in Political Science from the University at Albany; his J.D. from the Marshall Wythe School of Law of the College of William and Mary, where he was a member of the Law Review; and his B.A. in American Political History magna cum laude with High Honors from Colgate University, where he was elected to Phi Beta Kappa. He is an elected member of the American Law Institute.

Mary J. Bortscheller

Mary J. Bortscheller is an Associate at Cohen Milstein, and a member of the Firm's Employee Benefits Practice Group. In that role, Ms. Bortscheller represents the interests of employees, retirees, and plan participants and beneficiaries in ERISA cases in the district court and on appeal. Ms. Bortscheller is a strong, hands-on, strategic litigator, thoroughly versed in the complexities of ERISA law.

At present, Ms. Bortscheller is engaged in litigating a number of so-called "church plan" lawsuits. These cutting-edge legal cases assert that many non-profit health care systems in the United States wrongfully claim their benefit plans are exempt from ERISA regulation under the church plan exemption. Currently, Cohen Milstein serves as lead or co-lead counsel in 12 separate cases in various jurisdictions throughout the U.S.

Ms. Bortscheller is currently litigating the following matters:

- Trinity Health Corporation Church Plan Litigation: Cohen Milstein is co-lead counsel in Lann v. Trinity Health Corp., a lawsuit alleging that Trinity is violating numerous provisions of ERISA while wrongfully claiming that its defined benefit pension plan is exempt from ERISA because it is a church plan. Ms. Bortscheller is Lead Associate in the case, engaged in all aspects of the litigation including motions practice, discovery, the mediation process and finalizing the settlement. The case is ongoing.
- Catholic Health East Church Plan Litigation: Cohen Milstein is co-counsel in Chavies v. Catholic Health East, alleging that the health care system wrongfully claims its defined benefit pension plan is exempt from ERISA as a church plan. As the Lead Associate on this case, Ms. Bortscheller works on all aspects of the lawsuit, including fact and expert discovery, the mediation process and in finalizing the settlement. The case is ongoing.
- U.S. Bancorp Pension Plan Litigation: Cohen Milstein is co-lead counsel to an interim class of pension plan participants alleging that the plan's managers engaged in a risky, imprudent investment strategy by investing almost 100% of its assets in stocks, thus causing the plan to lose more than $1 billion during the collapse of the equities market in 2008. As Lead Associate on the case, Ms. Bortscheller is involved in all aspects of the litigation, including the initial case investigation and drafting of the complaint, motions practice, discovery and the appellate process. The case is ongoing.

In addition to her ERISA case work, Ms. Bortscheller represents, pro bono, unaccompanied minor clients in immigration proceedings. Prior to joining Cohen Milstein in 2013, Ms. Bortscheller practiced at a boutique commercial litigation firm based in Chicago, where she represented plaintiffs in antitrust and qui tam matters, as well as defendants in general commercial litigation.

Ms. Bortscheller graduated from Gustavus Adolphus College with a B.A., cum laude, in Political Science, and received her J.D., cum laude, from American University, Washington College of Law. During law school, she served as Features Editor and Senior Editor of Sustainable Development Law & Policy and was a staff member of the American University International Law Review. Ms. Bortscheller served as a judicial intern with the United States District Court for the District of Minnesota.
Before attending law school, Ms. Bortscheller served in the United States Peace Corps teaching English as a foreign language in Sichuan Province, China. Following law school, she was a volunteer for the Chicago Legal Clinic, Inc.'s Foreclosure Defense Project.

Brian E. Bowcut

Brian E. Bowcut is Of Counsel at Cohen Milstein, and a member of the firm's Public Client Practice Group. Mr. Bowcut represents state Attorneys General and other public-sector clients as outside counsel in investigations and lawsuits involving fraudulent and deceptive trade practices. Mr. Bowcut, who joined the firm in 2015, brings with him deep experience representing the federal government in complex litigation and in enforcement investigations. In his role as a senior lawyer in the Public Client Practice, he brings this experience to bear in false claims and consumer fraud enforcement at the state and local levels.

Mr. Bowcut formerly was a Trial Attorney in the Civil Division of the U.S. Department of Justice for nine years. Most recently, as a member of the Fraud Section, he investigated and litigated fraud across an array of government programs, from Medicare fraud by nursing facilities, hospices and medical device makers to schemes involving federal mortgage, foreign aid, and TARP funds. Before that, as a member of the Environmental Torts Section, he defended the United States as lead counsel in large-scale toxic tort litigation. Prior to joining DOJ, Mr. Bowcut was at a preeminent national law firm, where he specialized in pharmaceutical product liability and commercial litigation.

Currently, Mr. Bowcut is representing public clients in the following high-profile matters:

- Prescription Painkillers: Represents the City of Chicago and other clients in litigation and investigations concerning deceptive marketing of highly addictive prescription opioid. Overprescribing of these drugs for chronic pain has fueled a dramatic rise in addiction, overdose, and death in communities across the nation. Mr. Bowcut manages and oversees the day-to-day litigation and investigations of these matters, which are ongoing.
- Nursing Homes: Represents the New Mexico Attorney General in Medicaid and consumer fraud litigation over inadequate staffing and deficient care at a chain of nursing homes. Mr. Bowcut briefed and successfully argued the recent motion to dismiss. The case is ongoing.

While at DOJ, Mr. Bowcut successfully handled various matters, including:

- Investigating reckless origination of FHA mortgage loans by multiple large lenders, and obtaining $200 million settlement from U.S. Bank.
- Investigating fraudulent diversion of TARP funds by Arkansas bank official and negotiating settlement with his estate.
- Serving as lead counsel for the federal government in long-running herbicide drift litigation by more than 100 farms in southern Idaho and securing dismissal of all claims against the government.

- Representing the interests of the EPA and other United States agencies in consolidated litigation over thousands of first responders' toxic exposures at the World Trade Center disaster site.

Mr. Bowcut attended Utah State University, graduating summa cum laude with a B.A. in Journalism and Political Science. He earned his J.D. from Duke Law School, graduating cum laude and Order of the Coif, and also earned an M.A. in Public Policy from Duke. During law school, Mr. Bowcut was an Articles Editor for the Duke Law Journal. After law school, he clerked for the Honorable Stanley S. Brotman of the United States District Court for the District of New Jersey.

Molly J. Bowen

Molly J. Bowen is an Associate at Cohen Milstein and a member of the Public Client practice group. Ms. Bowen's practice focuses on the representation of state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud as well as other fraudulent and deceptive trade practices.

Prior to joining Cohen Milstein, Ms. Bowen practiced at a leading firm in Miami, litigating False Claims Act claims, antitrust and securities class actions, and legal malpractice claims. She also was a law clerk to the Honorable Karen Nelson Moore of the United States Court of Appeals for the Sixth Circuit.

Ms. Bowen graduated *magna cum laude* from Macalester College with a B.A. in Geography in 2007. She earned her J.D., *summa cum laude*, from Washington University School of Law in 2013, where she was a member of the Appellate Clinic and served as the Articles Editor for the *Washington University Law Review*. Additionally, during law school, Ms. Bowen externed at the Service Employees International Union (SEIU) legal department and at the American Civil Liberties Union of Eastern Missouri.

Jamie Bowers

Jamie Bowers is an Associate at Cohen Milstein and a member of the Firm's Employee Benefits Practice Group. In her role, Ms. Bowers represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases across the country.

Prior to joining Cohen Milstein, Ms. Bowers served as a judicial law clerk for the Honorable Gary R. Jones at the United States District Court for the Northern District of Florida, Gainesville Division. In this role she dealt with a variety of issues arising under federal law, including initial criminal appearances, plea changes, writs of habeas corpus, prisoner litigation, employment litigation, personal injury litigation, civil rights litigation, mass torts litigation, social security disability, and various matters under the Federal Rules of Civil and Criminal Procedure.

Ms. Bowers attended Duke University, graduating with a B.A. in Environmental Science in 2011. She earned her J.D. from Georgetown University Law Center in 2014. During law school, Ms. Bowers served on the Executive Board as the Administrative Editor of the *Georgetown Environmental Law Review*.

Ms. Bowers is the author of *Environmental Justice Implications of the Current Hydraulic Fracturing Regulatory Regime*, 32 Mich. Env. L. Jour. 93 (2013).

Robert A. Braun

Robert A. Braun is an Associate in the Antitrust practice group, having joined Cohen Milstein in 2014. In this role, he represents businesses and individuals in federal civil actions with a focus on class actions and antitrust litigation. Mr. Braun also has experience in international claims litigation, including representing the victims of state-sponsored terrorism.

Currently, Mr. Braun is litigating the following notable matters:

- *Anadarko Basin Oil and Gas Lease Antitrust Litigation*: Counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies conspired to rig bids for leases of land held by private landowners in parts of Oklahoma, Kansas, Texas and Colorado. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy.
- *In re Cast Iron Soil Pipe and Fittings Antitrust Litigation* (E.D. Tenn.): Cohen Milstein is co-lead in a class action lawsuit alleging price-fixing in the cast iron soil pipe and fittings market and challenging the defendants' efforts to maintain a duopoly and restrain competition from foreign competitors. The plaintiffs have defeated the defendants' motions to dismiss.
- *In re Ductile Iron Pipe Fittings Antitrust Litigation* (D.N.J.): Cohen Milstein is co-lead in a class action litigation alleging price-fixing of ductile iron pipe fittings and monopolization of the American-made ductile iron pipe fittings market. The court denied defendants' motions to dismiss and the plaintiffs have settled with two of the defendants.
- Iran Beirut Bombing Litigation: Cohen Milstein is representing the victims and family members of victims in the 1983 Beirut Marine Barracks bombing, the deadliest act of terrorism against Americans prior to September 11, 2001.
- Iraq Hostage Spouses Litigation: Cohen Milstein is representing the spouses of 30 Americans held hostage by former Iraq President Saddam Hussein during the Gulf War in 1990. After toppling Saddam Hussein's regime, the United States settled the hostage spouses' legal claims with Iraq, but has refused to compensate the hostage spouses out of the resulting settlement fund. Cohen Milstein alleges that these actions by the United States are a taking without just compensation in violation of the Fifth Amendment of the U.S. Constitution.
- Inmate Calling Services Provider Litigation: Cohen Milstein is on the executive committee in several nationwide class action lawsuits alleging that the providers of inmate calling services have charged inmates and their families unjust and unreasonable rates in violation of the Federal Communications Act and various state laws.

Prior to joining Cohen Milstein, Mr. Braun served as a law clerk for the Honorable Carolyn Dineen King of the U.S. Court of Appeals for the Fifth Circuit from 2013-2014, and for the Honorable Lee H. Rosenthal of the U.S. District Court for the Southern District of Texas. He was also an Arthur Liman Fellow at Southeast Louisiana Legal Services, where he worked on public interest housing litigation.

Mr. Braun earned his J.D. at Yale Law School and attended Princeton University, graduating *summa cum laude* with a B.A. in Sociology. During law school, Mr. Braun was an editor of the *Yale Journal of International Law* and a member of the mock trial team.

Admitted only in New York and Louisiana. Practice limited to matters and proceedings before federal courts and agencies.

Jay Chaudhuri

Jay Chaudhuri is Of Counsel at Cohen Milstein and joined the firm in 2016. He is based in Cohen Milstein's Raleigh, NC office.

Mr. Chaudhuri, who currently serves in the North Carolina State Senate representing parts of Raleigh, Cary and Morrisville, joins former North Carolina Court of Appeals Judge Martha Geer, who launched Cohen Milstein's Raleigh office in early 2016. Together, Mr. Chaudhuri and Ms. Geer will partner with law firms across the state to protect the rights of North Carolina's citizens and small businesses.

Mr. Chaudhuri has spent his career fighting and working on behalf of the people of North Carolina. As one of the newest state senators, he serves on the Commerce, Pensions & Retirements and Aging, Judiciary II, State and Local Government, and Appropriations on General Government and Information Technology committees. During his first legislative session, Mr. Chaudhuri co-sponsored a bill to repeal House Bill 2, a bill critics have referred to as the most anti-LGBT legislation in the country.

Prior to his appointment to the State Senate, Mr. Chaudhuri served as General Counsel & Senior Policy Advisor to State Treasurer Janet Cowell, where he helped recover more than $100 million for the pension and unclaimed property funds, including settlements from an investment manager and custodian bank. He also played a key role in uncovering alleged wrongdoings that involved eight investment managers, leading to a reimbursement of $15 million back into the pension fund and tougher, cutting edge ethical standards. Mr. Chaudhuri also served as Chair of the Council of Institutional Investors, an association of pension funds with combined assets of more than $3 trillion, which serves as the leading voice for effective corporate governance and strong shareholder rights.

Before joining the Department of State Treasurer, Mr. Chaudhuri served as Special Counsel to Attorney General Roy Cooper, where he helped lead an investigation by all 50 Attorneys General that resulted in a landmark agreement with two leading networking sites to better protect children from Internet predators. For his efforts, the National Association of Attorneys General honored him with the Marvin Award, given to an individual who furthers that association's goals.

The North Carolina Bar Association has awarded Mr. Chaudhuri its Citizen Lawyer Award, given to lawyers who provide exemplary service to their communities. *Lawyers Weekly* has also honored him with its Leaders in the Law award. In addition, he has been awarded the William C. Friday Fellowship, Henry Toll Fellowship, and American Marshall Memorial Fellowship.

Mr. Chaudhuri graduated from Davidson College, Columbia University School of International and Public Affairs, and North Carolina Central University School of Law (*cum laude*).

Robert W. Cobbs

Robert W. Cobbs is an Associate at Cohen Milstein, and a member of the Antitrust practice group.

Currently, Mr. Cobbs is litigating the following notable matters:

- Anadarko Basin Oil and Gas Lease Antitrust Litigation: Co-lead counsel for plaintiffs in class actions alleging that Chesapeake Energy, SandRidge Energy and a former executive of both companies

conspired to rig bids for leases of land held by private landowners in parts of Oklahoma and Kansas. This litigation follows the U.S. Department of Justice's early 2016 indictment of a co-founder and former CEO of Chesapeake Energy for allegedly participating in this bid-rigging conspiracy. Plaintiffs allege that Defendants illegally conspired to stabilize and depress the price of royalty and bonus payments paid to landowners in the Anadarko Basin oil and gas province — a massive geological formation holding natural gas and oil deposits that includes large parts of Oklahoma and Kansas. Pursuant to this conspiracy, Plaintiffs allege that Defendants communicated about and agreed on prices, allocated particular geographic areas between themselves, and rigged bids for leases of land, lowering acquisition prices across the region and thereby harming the proposed class of landowners.

- Dental Supplies Antitrust Litigation: Cohen Milstein was recently appointed interim co-lead counsel for a proposed class of dental practices and dental laboratories. The case alleges that Defendants Henry Schein, Inc., Patterson Companies, Inc., and Benco Dental Supply Company — the three largest dental supply and dental equipment distributors in the United States — fixed price margins on dental equipment, jointly pressured manufacturers to squeeze out competitors, and agreed not to "poach" each other's employees, in violation of federal antitrust law. As a result of the alleged conspiracy, dental practices and dental laboratories may have paid artificially inflated prices for many kinds of dental supplies and dental equipment, from consumables like gauze and cement to big-ticket equipment like chairs and x-rays.

Prior to joining Cohen Milstein, Mr. Cobbs clerked for the Hon. Pierre N. Leval, United States Court of Appeals for the Second Circuit; and for the Hon. J. Rodney Gilstrap, United States District Court for the Eastern District of Texas.

Mr. Cobbs graduated from Amherst College with a B.A. in English and Russian, *magna cum laude* with distinction, and received his J.D. from Yale Law School. During law school, he served as a Notes Editor of the *Yale Law Journal* and as a Submissions Editor of the *Yale Journal on Regulation*.

Shaylyn Cochran

Shaylyn Cochran is an Associate at Cohen Milstein and a member of the firm's Civil Rights & Employment Practice Group. Prior to joining Cohen Milstein, Ms. Cochran was a Relman Civil Rights Fellow, litigating federal fair housing and employment discrimination matters.

Ms. Cochran represents female employees alleging sexual discrimination against one of the nation's largest jewelry chains in Jock, et al. v. Sterling Jewelers Inc., a nationwide Title VII gender discrimination and Equal Pay Act case currently being litigated in arbitration. In Jock, the arbitrator recently certified a class estimated to include 44,000 current and former female retail sales associates, working at Sterling stores throughout the country, who have pay and promotions discrimination claims against the company. Ms. Cochran also is involved in a series of cases in Chicago alleging a pattern of race discrimination against African-American laborers, in which temporary staffing agencies and the client companies that they service have engaged in a practice of excluding African Americans from temporary laborer positions throughout the metropolitan area.

In addition to litigating several employment discrimination cases, Ms. Cochran also is part of the team representing the Equal Rights Center in Equal Rights Center v. Equity Residential, a federal fair housing lawsuit challenging Equity Residential's nationwide pattern or practice of designing and constructing multi-family housing complexes in violation of the accessibility requirements of the federal Fair Housing Act. The action

challenges FHA violations at 300 Equity Residential properties and seeks relief to ensure that Equity Residential's properties are accessible to people with disabilities and to enforce the standards of the FHA.

Ms. Cochran earned her B.S. and B.A. from Ohio University, graduating summa cum laude and Phi Beta Kappa, and her J.D. from Harvard Law School, where she received the Dean's Award for Community Leadership. While a law student, Ms. Cochran served as a litigation intern at the NAACP Legal Defense and Education Fund, and the Disability Rights Section at the U.S. Department of Justice, Civil Rights Division. For two years during law school, Ms. Cochran also was a student attorney at the Harvard Legal Aid Bureau, where she represented indigent clients on family law matters. She also served as president of the Harvard Black Law Students Association.

Brian Corman

Brian Corman is an Associate at Cohen Milstein and a member of the Civil Rights & Employment practice group. Mr. Corman's practice focuses on litigating civil rights, employment discrimination, and wage and hours cases. Prior to joining Cohen Milstein in 2015, Mr. Corman was an Associate in the Litigation group at a top-tier defendants' firm. There, he focused on Foreign Corrupt Practices Act internal investigations for Fortune 500 clients, as well as pro bono cases in federal district court and before the Supreme Court.

Currently, Mr. Corman is litigating a number of notable matters. He is involved in all aspects of litigation, including fact discovery, depositions and motions practice, on behalf of hundreds of Gentiva health care workers filing suit for unpaid overtime under the Fair Labor Standards Act. He represents Walmart workers in multiple federal district and appellate court cases alleging discriminatory pay and promotions practices in violation of Title VII of the Civil Rights Act. He also represents low-income minority renters in the Village of Mastic Beach who were evicted from their homes in violation of federal, state and local fair housing and civil rights laws.

Following law school, Mr. Corman clerked for the Honorable Harry Pregerson of the Ninth Circuit Court of Appeals. He then participated in a D.C. Bar Association Pro Bono Fellowship at the Lawyers' Committee for Civil Rights Under Law, working on education, voting rights and fair housing cases.

Mr. Corman earned his law degree from the University of California, Berkeley, School of Law, where he was an editor of the *California Law Review*, a member of the Jessup International Law Moot Court Team, co-chaired the Berkeley Law Expulsion Clinic, and externed for the Honorable William Alsup of the U.S. District Court for the Northern District of California. Mr. Corman received his B.A., *summa cum laude,* Phi Beta Kappa, in Political Science from Columbia University School of General Studies. Mr. Corman was a professional ballet dancer for eight years, performing with the Houston Ballet and Washington Ballet, among other companies.

Michael Dolce

Michael Dolce is Of Counsel at Cohen Milstein, and a member of the firm's Catastrophic Injury practice group. Mr. Dolce, who joined the firm in 2015, is a highly regarded trial lawyer and political activist who has dedicated his career to seeking justice for the victims of abuse. His practice focuses specifically on the victims of sexual abuse, sex crimes and domestic violence. He is a champion of children, representing child victims as well as adult survivors of child sex abuse who bear scars and injuries into adulthood. It is an experience he understands on a personal and visceral level: Having himself been the victim of sexual abuse as a young boy at

the hands of a sadistic predator, he arose from the trauma determined to be a voice for others and secure justice for them.

Mr. Dolce brings to his work the insight of a survivor who is determined to use his understanding and ability to communicate exactly what crime and injury victims go through, and what they need in their difficult and courageous healing processes. Among his noted work, in 2009, he achieved a jury verdict on behalf of a child abuse victim, totaling over $19.2 million, that was named by "Verdict Search" one of the top 100 verdicts nationwide that year.

In 2010, Mr. Dolce's six-year crusade in Florida's legislature culminated in the passage of sweeping legislation that repealed all statutes of limitation for civil and criminal prosecution of child sexual battery, overcoming a powerful and well-financed opposition. That victory was fueled by Mr. Dolce's testimony numerous times before legislative committees, which one major newspaper reported left senators "captivated" and "spellbound." His effort was supported by a grassroots organization of some 200 survivors that he led as the chair of the political committee, Protect Our Kids First, Inc., a campaign he formed to amend the state's Constitution on Election Day. His precedent-setting strategy worked to compel the Legislature to ensure that never again will a child in Florida be turned away from any civil or criminal court due to the passage of time. And no predator can ever again take comfort in the ticking of a clock after threatening a child into silence.

Mr. Dolce's work has gained him national recognition with awards from both fellow attorneys and crime victim advocates, including the National Center for Victims of Crime, the Florida Council Against Sexual Violence and the Florida Justice Association. Mr. Dolce is a sought-after speaker, having addressed conferences of many of the largest child abuse survivor organizations in the world, including the Survivors Network for those Abused by Priests. Recently, he was invited to join the Sexual Violence Focus Group of the Office of the Florida State Courts Administrator; the group will work over the next year on several sexual violence projects, including updating the Florida Sexual Violence Bench Book and developing a strategic plan for sexual violence projects. His work has been cited across the nation by law professors and judges, including the North Carolina Supreme Court.

Mr. Dolce graduated with a Bachelor of Arts, *summa cum laude*, from Lynn University and received his J.D. from Stetson University.

Currently, Mr. Dolce is litigating the following notable matters:

- *Jane Doe v. Florida Sheriffs Youth Ranches*: Mr. Dolce represents a teenaged sex abuse victim who was abused in a residential childcare facility by an adult resident of the facility. This civil suit against the facility follows a successful criminal prosecution of the abuser, asserting that the facility failed to maintain proper child safety procedures and policies.
- *Rose, Fitzsimons and Davis v. The Devereux Foundation, Inc.*: Mr. Dolce represents adult survivors in three related lawsuits, asserting child physical and sexual abuse at a licensed therapeutic group home perpetrated by several staff members.
- *Jane Doe v. Seagate Hotel and Spa*: Mr. Dolce represents an adult in this action against a resort hotel asserting that she was sexually assaulted by a massage therapist. The suit alleges that the hotel negligently hired the therapist who had been discharged just two months earlier by his prior employer for similarly sexually assaulting a guest.

- *Harris v. William Degray*: Mr. Dolce represents an adult survivor of domestic violence who suffered substantial physical and mental health injuries, including Battered Woman Syndrome.
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Some of his past successes include:

- *Jane Doe vs. Tim Crowe*: Mr. Dolce represented a child sex abuse survivor in a direct action against the perpetrator, resulting in a $19.2 million compensatory damage verdict, named one of the Top 100 verdicts nationwide in 2009 by *The National Law Journal*/Verdict Search.
- *Hollins v. Watchtower Bible and Tract Society of New York, Inc.*: Mr. Dolce represented an adult survivor of child sexual abuse against his former church (Jehovah's Witnesses), resulting in a confidential settlement.
- *A.S.W. v. Happy House, Inc.*: Mr. Dolce represented a pre-school child against a day care center in a child-on-child sex abuse case, resulting in a confidential settlement.
- *Jane Doe v. James Byrne and Linda Byrne*: Mr. Dolce represented a mentally disabled child in an action against a neighbor who sexually abused her over a two-year period and against the abuser's wife, on a theory that she failed to protect the child after finding evidence of ongoing abuse. The jury awarded damages of $3.5 million, ordering both defendants to pay.

Jeffrey Dubner

Jeffrey B. Dubner is an Associate at Cohen Milstein and a member of the Antitrust practice group, having joined the firm in 2011. In this role, Mr. Dubner represents a broad range of individuals, businesses, and unions in civil litigation, with a focus on multi-district class actions and antitrust litigation. He has represented both plaintiffs and defendants in antitrust matters, dealing with the application of the Sherman Act in industries from health care and financial services to professional sports and publishing.

Mr. Dubner is currently litigating the following matters:

- VFX/Animation Workers Litigation: Cohen Milstein is one of three court-appointed co-lead counsels in a litigation alleging that the major animation studios conspired to limit the opportunities and suppress the pay of special effects and animation workers by agreeing not to poach each other's employees. The litigation has survived a motion to dismiss and plaintiffs have moved for class certification. Mr. Dubner has been involved in all aspects of the litigation.
- Interest Rate Swaps: Cohen Milstein represents The City of Baltimore and the Public School Teachers' Pension and Retirement Fund of Chicago on behalf of a putative class in an action alleging that major investment banks conspired to prevent an exchange-traded market for interest rate swaps from developing. The case is currently pending centralization by the Joint Panel on Multidistrict Litigation.
- Sutter Health: Cohen Milstein represents self-insured entities in Northern California who are challenging anticompetitive practices by Sutter Health, the dominant hospital system in Northern California. Plaintiffs have defeated Sutter Health's motion to compel arbitration and demurrer, and the case is currently in discovery.
- Angola Prison/Louisiana Department of Public Safety and Corrections Litigation (pro bono): Mr. Dubner is co-lead counsel on a class action lawsuit alleging that the Louisiana Department of Public Safety and Corrections failed to provide adequate health care services to inmates at Angola Prison, the largest state-run maximum security prison in the United States. The case is currently in discovery.

Mr. Dubner played an important role in litigating the following successes:

- Electronic Books Antitrust Litigation: Cohen Milstein was co-lead counsel in a class action lawsuit alleging that Apple and five of the leading U.S. publishers conspired to raise the retail prices of ebooks. The five publishing defendants settled for $166 million and a settlement was reached with Apple for an additional $400 million. Mr. Dubner was lead associate on the case and was involved in all aspects of the litigation, including trial preparation.
- Sports Broadcasting Antitrust Litigation: Cohen Milstein was co-lead counsel for plaintiffs in class actions alleging that the system of geographical broadcasting territories employed by Major League Baseball and the National Hockey League amount to unlawful market allocation under Section 1 of the Sherman Act. The last settlements were reached on the eve of trial and are awaiting final Court approval. Mr. Dubner was lead associate on the NHL and MLB lawsuits and was involved in all aspects of the litigation, including arguing motions and examining witnesses before the court.
- Prime Healthcare Services Litigation: Cohen Milstein successfully defended the Service Employees International Union (SEIU) against antitrust claims brought by Prime Healthcare Services, alleging that SEIU conspired with Kaiser Permanente to drive Prime out of the market. Cohen Milstein succeeded in having the complaint and the amended complaint dismissed in the Southern District of California and defeating an appeal in the Ninth Circuit. Mr. Dubner was the lead associate on the case and was involved in all aspects of the litigation, including drafting the successful motions to dismiss and appellate brief.
- Detroit Nurse Wages Antitrust Litigation: Cohen Milstein represents a class of nurses in *Cason-Merenda v. Detroit Medical Center* (E.D. Mich.), alleging that Detroit hospitals suppressed wages through anti-competitive information exchanges. All eight defendants settled, creating a common fund of more than $90 million for Detroit's nurses. Mr. Dubner participated in the trial preparation for the case.

In addition to state and federal antitrust laws, Mr. Dubner has litigated claims under the Stored Communications Act, the Commodities Exchange Act, the Americans with Disabilities Act, and other state and federal statutes. *The National Law Journal* named him a Rising Star in 2015, one of only 40 attorneys in Washington, D.C., so honored.

Prior to joining the firm, Mr. Dubner was a law clerk for the Honorable Guido Calabresi of the U.S. Court of Appeals for the Second Circuit and the Honorable John G. Koeltl of the U.S. District Court for the Southern District of New York. Mr. Dubner attended Harvard University, graduating *cum laude*with a B.A. in Psychology, and earned his J.D. *magna cum laude* from Harvard Law School. Mr. Dubner served as a Notes Editor for the *Harvard Law Review*. Mr. Dubner is admitted to practice in New York, the District of Columbia, the Southern District of New York, and the Eastern District of Michigan. He is also a New York Times–published crossword constructor.

Suzanne Dugan

Suzanne M. Dugan is Special Counsel to Cohen Milstein and leads the firm's Ethics & Fiduciary Counseling practice, a practice she helped found within the Securities Litigation & Investor Protection practice group.

Ms. Dugan joined Cohen Milstein in 2011, following more than 20 years of service in government, first as counsel to and acting director of the New York State Ethics Commission and then as Special Counsel for Ethics for the Office of the New York State Comptroller. Her service in government and experience as an in-house counsel offer the broad and unique perspective of a regulator and the understanding of an in-house counsel.

From this unique vantage, Ms. Dugan counsels pension funds on fiduciary responsibility, ethical duties, strategic governance and compliance issues. She consults with governmental entities and other clients on design, implementation, management and assessment of comprehensive ethics programs. She also assists in conducting investigations and structuring recommendations, and provides expert legal and consulting services to law firms retained to conduct special reviews, providing an additional layer of oversight and accountability.

Ms. Dugan brings her experience gained from having served as ethics counsel to the third largest public pension fund in the country to advise and counsel pension fund trustees and senior managers on issues and challenges, providing collaborative and creative solutions for pension funds as they navigate changing economic challenges and organizational requirements.

At Cohen Milstein, Ms. Dugan has provided ethics counsel to some of the largest public pension funds, and serves as compliance counsel to another top 10 fund, among others. She has also conducted ethics and fiduciary training for the boards of trustees of some of the country's largest public pension funds. In addition, she serves as counsel to a number of large municipalities across the country, where she evaluates and investigates complaints of unethical conduct, provides objective and independent guidance and works to ensure a culture of ethical leadership.

Ms. Dugan is a frequent lecturer and panelist at conferences and forums addressing ethics and fiduciary issues in the public and nonprofit sectors, including pension funds, bringing with her an understanding of ethical issues born out of practical experience as well as scholarly pursuits. She has served as an adjunct professor, teaching a course on Government Ethics, and writes frequently on ethics, fiduciary responsibilities of pension trustees and the role of pension fund attorneys.

She serves on the Fiduciary and Plan Governance Steering Committee of the National Association of Public Pension Attorneys, a professional organization dedicated to providing legal educational opportunities and informational resources to its member attorneys. Ms. Dugan also is an active member of the Council on Government Ethics Laws, an international organization dedicated to issues involving governmental ethics, elections, campaign finance, lobby laws and freedom of information.

Ms. Dugan began her career as a judicial clerk with the Appellate Division, Third Department, of the New York State Supreme Court. She also served as an administrator at Albany Law School, as well as the pro bono Legal Director of a not-for-profit in the Albany area. She currently is a member of the Board of Directors of her local Planned Parenthood affiliate and an elected Trustee of the Clifton Park-Halfmoon Public Library.

Ms. Dugan attended Siena College, graduating *magna cum laude*, and earned her J.D. *cum laude* from Albany Law School of Union University. In 2014, she received the distinguished Burton Award for Legal Writing. She is an elected member of the American Law Institute, where she is a member of the Consultative Group on Government Ethics, among others.

Adam Farra

Adam Farra is an Associate at Cohen Milstein and a litigator in the firm's Securities Fraud & Investor Protection practice group. His practice primarily involves representing investor clients who have been injured by

corporate fraud perpetrated by publicly-traded companies. He also frequently represents individuals in civil rights and constitutional cases.

Representative examples of Mr. Farra's experience include the following:

- *Scinto v. Stansberry.* As lead counsel, Mr. Farra argued before a federal appeals court on behalf of a client alleging that federal prison officials violated the Eighth Amendment's prohibition on cruel and unusual punishment when they failed to provide him adequate medical care.
- *Fontanez v. O'Brien*. As lead counsel, Mr. Farra successfully argued before a federal appeals court on behalf of a client whose habeas petition was initially dismissed by the district court on jurisdictional grounds. In a unanimous, published opinion, the Fourth Circuit reversed and remanded the dismissal.
- *Richards v. Maryland.* As lead counsel, Mr. Farra argued before a Maryland appeals court on behalf of a client who challenged his criminal conviction on the grounds that the officers who arrested him violated the Fourth Amendment in a traffic stop-and-frisk case.
- *In re Ability, Inc. Securities Litigation.* Mr. Farra represents shareholders in a class action in federal court in Manhattan against Ability, Inc. and its directors and officers. The shareholders allege that the company and its officers violated federal securities fraud laws.

After law school, Mr. Farra clerked for Judge Andre M. Davis on the U.S. Court of Appeals for the Fourth Circuit and Judge Peter J. Messitte on the U.S. District Court for the District of Maryland. Prior to joining Cohen Milstein, Mr. Farra was a commercial litigator at a major law firm in Washington, D.C.

Mr. Farra also serves as an adjunct professor at the University of Maryland School of Law, where he teaches a seminar in constitutional law.

Mr. Farra is a graduate of the University of Michigan. He received his J.D. from the University of Maryland School of Law, from which he graduated *magna cum laude* and Order of the Coif.

Susan M. Greenwood

As an attorney in the New York office, Susan M. Greenwood is a member of Cohen Milstein's Securities Litigation & Investor Protection Practice Group. With extensive experience in the area of securities law and class action litigation, Ms. Greenwood analyzes and evaluates securities litigation case opportunities.

Prior to joining Cohen Milstein, Ms. Greenwood was a Securities Law Specialist at Bloomberg Law, providing analysis of trends and developments in securities litigation, regulation and enforcement and serving as the editor of the Bloomberg Law Securities Litigation and Enforcement Report. She also has served as counsel at a prominent insurance company and two large litigation firms.

Ms. Greenwood attended Cornell University, graduating cum laude with Distinction, and earned her J.D. at the University of Pennsylvania School of Law.

Elizabeth C. Guarnieri

Elizabeth C. Guarnieri is a Senior Attorney in Cohen Milstein's Securities Fraud & Investor Protection Practice Group, and a member of the Ethics and Fiduciary Counseling Practice. Ms. Guarnieri serves as the Firm's Director of Investor Services. In the role of Director of Investor Services, she leads the Firm's portfolio

monitoring and damage calculation process and oversees client reports. She is an integral member of the Securities Case Evaluation Team, which analyzes new and potential securities actions.

In addition, Ms. Guarnieri led the Cohen Milstein team in developing the Firm's proprietary portfolio monitoring and damage calculation system, COMPAS (Cohen Milstein Portfolio Assessment System). She also oversaw the rollout of the COMPAS client self-service portal which provides clients with web access to monitoring information as well as historical portfolio monitoring reports. She coordinates with our IT department and analysts to ensure the security of clients' transactional information.

Prior to joining Cohen Milstein, Ms. Guarnieri spent nearly 10 years as a securities and antitrust litigator. Working at two prominent plaintiffs' class action law firms in San Francisco, she represented individual and institutional investor clients in individual, class action and shareholder derivative securities litigation. Her decade of working on behalf of institutional investors has provided her with an experience and insight that she brings to her fiduciary and ethics counseling practice. Working with clients who have hired Cohen Milstein for fiduciary or ethics counseling, Ms. Guarnieri has undertaken a variety of projects — from researching and preparing presentations on fiduciary and ethics issues to assisting with the revision of an ethics code for a large county client.

In addition to her litigation experience, Ms. Guarnieri also worked as a legal analyst with Bloomberg L.P., regularly contributing articles to Bloomberg's Antitrust and Trade Law Reporter. She is the co-author of The Misapplication of American Pipe Tolling Principles, ABA Securities Litigation Journal, (Volume 21, Number 2, Winter 2011).

In her pro bono work, Ms. Guarnieri was one of a coalition of counsel that represented plaintiffs who sued Chevron for egregious injuries related to the company's oil production in Nigeria. She also served on the Board at the Meiklejohn Institute for Civil Liberties, an organization dedicated to developing innovative ways of using human rights law to promote equality and protect the disadvantaged.

Ms. Guarnieri attended Rider University, graduating magna cum laude with a B.A. in Political Science, and earned her J.D. at Rutgers School of Law.

Sally M. Handmaker

Sally M. Handmaker is an Associate at Cohen Milstein and a member of the firm's Consumer Protection practice group. In that role, Ms. Handmaker litigates actions to enforce consumer rights under federal and state laws.

Prior to joining Cohen Milstein in 2014, Ms. Handmaker was a Litigation Associate at a top-tier defense firm, working on complex commercial and general litigation matters in federal and state courts covering a variety of subject matters, including antitrust, securities litigation, sports, intellectual property and employment. She also maintained an active pro bono practice and, in particular, was recognized for her work with the Lawyers Committee for Civil Rights Under Law's Voting Rights Project.

Ms. Handmaker is currently litigating the following notable matters:

- *Parker, et al. v. America Traffic Solutions, et al.*: Ms. Handmaker is Lead Associate on the case team that is litigating claims against Florida municipalities and red light camera vendors alleging improper delegation power to enforce red light camera violations and improper collection of fines regarding same.
- *In re: Lumber Liquidators Chinese-Manufactured Flooring Products, Sales Practice and Product Liabilities Litigation:* Ms. Handmaker is Lead Associate on the case team litigating claims against Lumber Liquidators alleging fraudulent sale of composite flooring that contains excessive and unlawful levels of formaldehyde, a carcinogen.
- *Ubaldi v. SLM Corporation:* Ms. Handmaker is Lead Associate on case team litigating claims against Sallie Mae Inc. alleging usurious loan practices.

Some of her past successes include:

- Symantec Corp. Litigation: Ms. Handmaker was Lead Associate on the case team that succeeded in gaining final approval of a $60 million settlement. The case against Symantec and Digital River alleged misrepresentations regarding the companies' Extended Download Service. Ms. Handmaker was heavily engaged in the trial preparation for the lawsuit, which settled on the eve of the trial.
- Caterpillar Litigation: Ms. Handmaker was Lead Associate in a nationwide product liability class action against Caterpillar, Inc. alleging that engine exhaust system defects resulted in power losses and shutdowns that prevented or impeded their vehicles from transporting goods or passengers.

Ms. Handmaker attended the University of Southern California, graduating *summa cum laude* with a B.A. in Psychology and a B.A. in Political Science. Her undergraduate honors thesis was published in the American Psychological Association journal *Law and Human Behavior* under the title "'How Did You Feel?': Increasing Child Sexual Abuse Witnesses' Production of Evaluative Information."

Ms. Handmaker received her J.D. from the University of Virginia School of Law. While in law school, Ms. Handmaker served as an intern at the U.S. Department of Justice's Criminal Division focusing on cases involving child sexual abuse. She also served on the board of The Virginia Innocence Project, the University of Virginia's arm of the national litigation and public policy organization dedicated to exonerating wrongfully convicted people through DNA testing and reforming the criminal justice system. Ms. Handmaker also participated in the University of Virginia School of Law's Moot Court program and served on the Editorial Board of the *Journal of Law & Politics*.

Johanna M. Hickman

Johanna M. Hickman is an Associate at the firm, and is a member of the Public Client practice group. In this position, Ms. Hickman represents state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud and other fraudulent and deceptive trade practices. Previously, she assisted in litigation by a state attorney general regarding the robo-signing of mortgage foreclosure documents. In addition, she has worked on a number of confidential investigations.

Currently Ms. Hickman is representing public clients in the following high-profile matters:

- Nursing Homes: Representing attorneys general in investigations and litigation related to deceptive marketing by several nursing home chains that promised, but failed to provide, basic care to their

elderly residents. She is involved in all aspects of the investigations and litigation, including conducting and analyzing the results of investigations, developing legal theories, conducting fact and expert discovery and writing briefs.

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Ms. Hickman serves on the adjunct faculty of the Georgetown University Law Center, where she teaches a course in advanced legal writing and practice. Prior to joining Cohen Milstein in 2013, Ms. Hickman practiced at a leading defendants' firm, where she advised clients regarding environmental and toxic tort liability, negotiated the environmental aspects of corporate transactions, and represented clients in complex insurance coverage litigation. Prior to that, Ms. Hickman clerked for two years for the Honorable James I. Cohn of the United States District Court for the Southern District of Florida.

Ms. Hickman graduated with Highest Honors from the University of North Carolina at Chapel Hill with a B.A. in Journalism and Mass Communication. Ms. Hickman earned her J.D., *cum laude*, from the Georgetown University Law Center. She served as a Law Fellow, a Global Teaching Fellow, and a Staff Member and Symposium Editor of the *Georgetown Journal of Legal Ethics*. As a member of Georgetown's Barristers' Council, she was a finalist in Georgetown's 35th Annual Leahy Moot Court Competition, and her team won the Award for Best Brief Overall at the 2005 Pace National Environmental Law Moot Court Competition.

Anita F. Hill

Anita F. Hill is Of Counsel at Cohen Milstein, and a member of the Firm's Civil Rights & Employment Practice Group. In that role, she advises on class action workplace discrimination cases. Ms. Hill, who joined the Firm in 2011, has played a leading role in furthering equal opportunity and ending discrimination in the United States, and brings with her more than three decades of legal, governmental, policymaking and academic experience to the Civil Rights Practice. She is a noted speaker, thinker, commentator and author who has contributed to a broad range of important civil rights and social issues, including race, gender discrimination, media and the law. She has appeared on numerous television and news programs, and her writings and opinions regularly are published in leading newspapers and magazines in the United States and the world.

Ms. Hill began her career as an associate with a boutique defendants' firm based in Washington, D.C., which specialized in antitrust, federal agency and environmental work for corporate clients; in that role, she researched and wrote appellate and agency briefs on questions concerning environmental, corporate, antitrust and administrative law. She then served as special counsel to the assistant secretary of the Department of Education's Office for Civil Rights, where she advised on legal and policy matters related to individual and systemic claims of educational discrimination, reviewed legal and policy positions for government-wide enforcement efforts and wrote position papers on various civil rights education issues including race and gender discrimination claims and with a specific focus on issues facing historically black colleges and universities.

Later, Ms. Hill became adviser to the Chairman of the Equal Employment Opportunity Commission (EEOC), reviewing and analyzing Commission policy, writing legal policy and position papers for the Chairman and advising him on the effectiveness of the program and the functions of the Commission.

For more than three decades, Ms. Hill has taught law and public policy. She began her teaching career as an assistant professor at Oral Roberts University and later joined the faculty at the University of Oklahoma College of Law. In 1989, Ms. Hill became the first African American to be tenured at the University of Oklahoma, College of Law, where she taught contracts and commercial law. Since 1999, Ms. Hill has been on

the faculty of Brandeis University where she holds the title of University Professor, the highest academic rank awarded by Brandeis. Hill is one of only seven University Professors in the school's history. She teaches in the areas of civil rights, legal history and race and gender law and policy.

Ms. Hill is the author of numerous academic articles on international commercial law, contracts, bankruptcy and civil rights—all areas in which she has taught. She has given presentations on commercial law as well as race and gender equality to hundreds of business, professional, academic and civic organizations in the United States and abroad. In addition, she has appeared on several television programs, such as *Face the Nation* and *Meet the Press*, and has written for leading newspapers and magazines including *Newsweek*, *The New York Times* and *Boston Globe and Time.com*. Ms. Hill is the author of *Speaking Truth to Power* and served as the co-editor of *Race, Gender, and Power in America: The Legacy of the Hill-Thomas Hearings*. Her latest book is*Reimagining Equality: Stories of Gender, Race and Finding Home* (Beacon Press, 2011), an analysis of the housing market collapse of 2008 and its impact on gender and racial equality.

She is the recipient of numerous awards, grants and honorary degrees. Hill's professional and civic contributions include chairing the Human Rights Law Committee of the International Bar Association, and membership on the Board of Governors of the Tufts Medical Center and the Board of Directors of the National Women's Law Center and the Boston Area Lawyers Committee for Civil Rights. Ms. Hill was the subject of the documentary, *Anita: Speaking Truth to Power*, which premiered at the Sundance Film festival in January 2013. Ms. Hill attended Oklahoma State University, where she majored in Psychology, and earned her J.D. at Yale University Law School.

Julia Horwitz

Julia Horwitz is an Associate at Cohen Milstein and a member of the Firm's Employee Benefits Practice Group. In her role, Ms. Horwitz represents the interests of employees, retirees, plan participants and beneficiaries in ERISA cases across the country.

Prior to joining Cohen Milstein, Ms. Horwitz served as a law clerk for the Honorable Mary Ellen Coster Williams at the United States Court of Federal Claims. She worked at the Electronic Privacy Information Center in DC from 2012-2015, first as an Open Government Coordinator and Counsel, and then as the Director of the Consumer Privacy Project. Ms. Horwitz also was an Adjunct Professor at Georgetown Law School for a semester in 2013.

Ms. Horwitz attended Brown University, graduating with a B.A. in English, magna cum laude, in 2008. She earned her J.D. from the University of Chicago Law School in 2012. During law school, Ms. Horwitz was a staff member on the Edwin F. Mandel Legal Aid Clinic Employment Discrimination Project.

Anna Jagelewski

Anna Jagelewski is an Associate at Cohen Milstein and a member of the Public Client practice group. Ms. Jagelewski's practice focuses on the representation of state Attorneys General and other public-sector clients in investigations and lawsuits involving health care fraud as well as other fraudulent and deceptive trade practices.

Prior to joining Cohen Milstein, Ms. Jagelewski was a law clerk for the Honorable Andre M. Davis of the U.S. Court of Appeals for the Fourth Circuit. She also clerked for the Honorable Reggie B. Walton of the U.S. District Court for the District of Columbia and the Honorable Florence Y. Pan of the Superior Court of the District of Columbia. Ms. Jagelewski also served as the Francis D. Murnaghan Appellate Advocacy Fellow at the Public Justice Center.

Ms. Jagelewski graduated, magna cum laude, from Ohio University with a B.A. in English in 2004. She earned her J.D., summa cum laude, Order of the Coif, from American University's Washington College of Law in 2011. During law school, Ms. Jagelewski served as the Associate Articles Editor for the American University Law Review and was the Founder and Chair of the American University Law Review Diversity Committee.

Ms. Jagelewski is not admitted in the District of Columbia; her practice is under the supervision of partners of the firm.

Nicholas Johnson

Nicholas C. Johnson is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death practice area. In that role, Mr. Johnson's practice focuses on medical malpractice, nursing home abuse, and personal injury cases.

Prior to joining Cohen Milstein in 2014, Mr. Johnson worked for two South Florida defense firms, gaining valuable experience representing Fortune 500 insurance companies in the defense of claims and lawsuits. Earlier in his career, Mr. Johnson practiced as an Assistant Public Defender in Palm Beach County, where he represented indigent clients charged with misdemeanors and felonies, ranging from DUI to crimes punishable by life in prison. He was awarded the Best Advocate Award at the Florida Public Defender College in November 2008. Mr. Johnson tried approximately 30 jury trials to verdict as an Assistant Public Defender. Eager to resume his representation of individuals, Mr. Johnson joined Cohen Milstein in 2014.

Mr. Johnson has litigated the following notable matters:

- *Pavlov v. PBSO:* Mr. Johnson was a member of a team of attorneys representing the mother of a 28-year-old mentally disturbed man who was shot and killed by a Deputy Sheriff of the Palm Beach County Sheriff's Office. Mr. Johnson was instrumental in litigating this case, which resulted in the largest settlement paid out by the Palm Beach County Sheriff's Office.
- *McCool v. Woodstream and Home Depot:* Mr. Johnson represents the family of Mary Jo McCool, a 46-year-old woman who was found drowned in her pool as a result of becoming overcome by the fumes from a propane mosquito trap. The matter currently is being litigated in Federal Court.
- Nursing Home Neglect Litigation: Mr. Johnson represented the spouse of an 85-year-old man who experienced a series of falls in a nursing home before finally fracturing his hip, which required hip replacement surgery. Mr. Johnson reached a confidential settlement in this case that alleged neglect on the part of the nursing home.

Mr. Johnson was selected to serve as a member of the 2015 class of The Florida Bar Leadership Academy, and was recently selected to the American Association for Justice's 2016 Leadership Academy. Mr. Johnson serves on the Board of Directors for the Palm Beach County Bar Association North County Section, and currently serves on the Board of the Florida Justice Association's Young Lawyer Section and the Membership Diversity

Committee, and is an active member of the Palm Beach County Bar and the Palm Beach County Justice Association. He is also actively involved in the American Association for Justice's Minority Caucus. He writes on various legal topics in such publications as the *Florida Justice Association Journal*.

Mr. Johnson graduated from Boston University with a B.A. in Economics, and completed his Master's in Sports Management at the University of Florida. He graduated *cum laude* from St. Thomas University School of Law in 2007. Mr. Johnson, who was born and raised in Kingston, Jamaica, has represented Jamaica at several international swimming competitions.

Eric Kafka

Eric A. Kafka is an Associate at Cohen Milstein, and a member of the firm's Consumer Protection practice group. Mr. Kafka's practice focuses on litigating class actions on behalf of consumers who have been deceived and harmed by large corporations.

Currently, Mr. Kafka is litigating the following notable matters:

- *In re Anthem, Inc. Data Breach Litigation:* Mr. Kafka represents consumers who were affected by the Anthem data breach. Plaintiffs allege that their confidential information, including their Social Security numbers, was compromised in the data breach.
- *Hankinson, et al. v. R.T.G. Furniture Corp., d/b/a Rooms to Go:* Mr. Kafka represents furniture consumers who allege that Rooms to Go misrepresented that it would professionally treat their furniture with stain-resistant chemicals.
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Prior to attending law school, Mr. Kafka worked on multiple poliltical campaigns, including President Obama's 2008 presidential campaign.

Mr. Kafka earned his J.D. from Columbia Law School, where he was a Harlan Fiske Stone Scholar. He received his B.A. from Yale University.

Adam Langino

Adam J. Langino is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Managed Care Abuse, and Unsafe & Defective Products practice groups. In his role, Mr. Langino represents clients who have been seriously or catastrophically injured, those who have suffered from managed care abuses and people who have been injured as a result of faulty products—and holding those responsible accountable for those injuries. Mr. Langino is an experienced, hands-on attorney, who has tried more than 20 jury trial cases in his career. Presently, he is litigating a number of product safety cases involving child booster seats.

Prior to joining Cohen Milstein in 2014, Mr. Langino was an Associate at Leopold Law and also served for three years as an Assistant Public Defender in West Palm Beach, FL. As an Assistant Public Defender, Mr. Langino handled complex felony criminal cases, including first-degree felonies and crimes punishable by life in prison. He gained valuable trial experience and secured freedom for the wrongly accused. Before his service as an Assistant Public Defender, Mr. Langino clerked for the Federal Public Defender in Minneapolis.

Currently, Mr. Langino is litigating the following notable matters:

- *Back-Cruz v. Evenflo, Inc.:* Mr. Langino represents the family of a child plaintiff in a product liability case. The lawsuit alleges that the poorly designed Evenflo booster car seat that the child was in failed to keep her safe in a car crash, resulting in catastrophic injuries. Mr. Langino is the primary attorney on the case and is managing all aspects of the litigation.

Some of his past successes include:

- *Mincey v. Takata:* Cohen Milstein was lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her paralyzed from the neck down in 2014 when the driver's side airbag deployed too aggressively during a vehicle collision. Patricia Mincey passed away in early 2016 due to complications from the quadriplegia caused by the problematic airbag. The suit charged that the Takata Corporation, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. Evidence uncovered by the firm showed that Takata concealed the defective nature of the airbag system for more than a decade. The case was resolved in July 2016. Mr. Langino had been involved in all aspects of the litigation, including discovery, taking depositions and directing motions.
- *Fuse v. Palm Tran:* Mr. Langino represented the family of a 5-year-old disabled child in a catastrophic injury case alleging that the disabled child suffered permanent brain damage during transport on the Palm Tran Connection service, a transportation service for elderly and disabled patrons, when the vehicle's driver ignored her calls for help, failed to provide first aid, and delayed access to emergency medical aid. The case was resolved in a settlement in excess of $1 million.
- *Hauser v. Rice Insulation:* Mr. Langino represented the Hauser family in a product liability lawsuit alleging that Rice Insulation, an insulation contractor, installed foam insulation incorrectly in the plaintiff's house, resulting in the house burning to the ground. The lawsuit included the contractor as well as the manufacturer for not providing sufficient warnings that the product might ignite under certain conditions. The matter was resolved confidentially. Mr. Langino managed all aspects of the litigation.
- *Palmer v. Baylines Inc.:* Mr. Langino represented the Palmer family in catastrophic injury and product safety lawsuit in which a truck driver fell asleep at the wheel and crashed into a vehicle carrying the Palmers, resulting in the death of Mrs. Palmer. Mr. Langino brought a catastrophic injury case against the trucking company Baylines Inc., and a product safety case against the carmaker of the vehicle that the Palmers were driving alleging that the airbags did not deploy properly, leading to Mrs. Palmer's death. The case was resolved in a confidential settlement. Mr. Langino managed all aspects of the litigation, including expert witnesses.

Mr. Langino was selected to the 2015 class of the American Association for Justice Leadership Academy, which is comprised of a select group of plaintiff trial lawyers chosen from across the country for national leadership training. The National Trial Lawyers has named Mr. Langino one of the Top 100 Trial Lawyers, Florida, for three years running, beginning in 2013. He is also an active member in the Palm Beach County Bar Association, the Board of the Florida Justice Association Young Lawyer Section, and the AAJ Membership Oversight Committee.

Mr. Langino attended the University of Maryland, graduating *magna cum laude* with Honors in Government and Politics, and earned his J.D., *cum laude*, from the University of Minnesota School of Law, where he received an award for Best Oral Argument and participated in the Wagner Labor Law Moot Court program.

A former amateur boxer, Adam volunteers as boxing coach for local youths for the Police Athletic League located in Palm Beach Gardens. He is the Past-President of Club 100 Charities and a board member of Cops Helping Kids, charities that are dedicated to improving Palm Beach County by focusing on the needs of the youth and elderly.

Joel P. Laitman

Joel P. Laitman is Of Counsel at Cohen Milstein and a member of the Securities Litigation & Investor Protection Practice Group. Mr. Laitman has served as lead counsel in five of the firm's major mortgage-backed securities class actions brought on behalf of pension funds and other institutional investors against major investment banks. These cases alleged that the underlying mortgages failed to comply with the underwriting standards described in the Offering Documents.

Besides initiating these cases and directing and leading discovery with his partner Chris Lometti, Mr. Laitman argued all motions and conducted all hearings both before the District Court and the Second Circuit. In just three of these cases that have settled to date, recoveries totaling $720 million were achieved for the benefit of injured investors: $335 million in the RALI MBS case brought against Goldman Sachs, UBS and Citigroup; $275 million in the Harborview MBS case brought against RBS; and $110 million in the HEMT MBS case brought against Credit Suisse.

The settlements achieved in these cases have been commended by Courts and by legal publications. Commenting on the Harborview litigation, Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, noted that the case brought on behalf of the plaintiffs was "interesting and different" and that settlement on their behalf "was a job well done." Judge Fallia, in approving the RALI Settlement, commended the firm for prosecuting the case for seven years and "never giving up" despite substantial obstacles.

The litigations and settlements have garnered awards from the leading legal publications. In 2014 and 2015, the National Law Journal cited the Harborview and RALI MBS in designating the firm an Elite Trial Law Firm and placing the firm on the Hot List; Law360 cited the RALI and Harborview cases in designating the firm one of "The Most Feared Plaintiffs Firms" in 2015, the third year in a row that Cohen Milstein received the designation; and in 2015, Law360 selected Cohen Milstein as the sole plaintiff firm to be chosen in two "Practice Groups of the Year" categories and one of only five class action law firms to be recognized, singling out the RALI and Harborview cases in the award.

In addition, Mr. Laitman has argued a number of seminal cases before the Second Circuit in the securities field including: Teamsters Local 445 Freight Div. Pension Fund v. Dynex Capital, Inc., 531 F.3d 190 (2d Cir. 2008) (addressing corporate scienter under Section 10 (b)); Teamsters Local 445 Freight Div. Pension Fund v. Bombardier, Inc., 546 F.3d 196 (2d Cir. 2008) (addressing standard for establishing market efficiency in certification of Section 10(b) claims); N.J. Carpenters Health Fund v. Royal Bank of Scotland Group, PLC, 709 F.3d 109 (2d Cir. 2013) ("NovaStar") (reversing dismissal of Securities Act claims); Wyo. State Treasurer v. Moody's Investors Serv. (In re Lehman Bros. Mortgage-Backed Sec. Litig.) ("Lehman"), 650 F.3d 167 (2d Cir. 2011) (addressing rating agency liability under the Securities Act); and N.J. Carpenters Health Fund v. RALI Series 2006-QO1, 477 Fed. Appx. 809 (2d Cir. 2012) ("Harborview/RALI", addressing class member knowledge as grounds for denial of class certification).

A member of Phi Beta Kappa, Mr. Laitman is a graduate of Columbia University, with a B.A., magna cum laude, and earned his law degree at Georgetown University Law Center.

Stephan A. LeClainche

Stephan A. LeClainche is Of Counsel at Cohen Milstein, and head of the firm's Medical Malpractice group. In his role, Mr. LeClainche represents victims and the families of victims of all types of medical negligence. His practice specializes in medical malpractice, but also includes medical device litigation, automobile negligence, sexual abuse and other serious injury and wrongful death cases.

Mr. LeClainche is an experienced trial attorney, whose recent admission to the prestigious American College of Trial Lawyers attests to his reputation among peers as an outstanding trial lawyer. He understands, however, that legal skill in a courtroom is only a part of the qualifications that a good attorney brings to the practice in representing the victims of negligence. Equally important is the empathy an attorney must possess in counseling and guiding these victims and their families. The best attorneys are advisers and advocates, compassionate yet aggressive—a partner to clients, making them part of the team. These are traits that Mr. LeClainche brings to each of his cases.

Prior to joining Cohen Milstein in 2015, Mr. LeClainche was a name partner in a boutique trial law firm based in West Palm Beach. A Florida Board-Certified Civil Trial Lawyer since 1996 with more than three decades of experience litigating civil lawsuits, Mr. LeClainche is both a veteran attorney and a seasoned investigator, investing the time necessary to unearth and analyze every potentially relevant facet of a case. Many of his cases represent the cutting edge of both medicine and law, and grow out of the evolution of medicine and its practice. The cases may be different, but the complexities, challenges and stakes are always high, requiring attention to detail – and dedication to a client's needs and concerns.

Some of Mr. LeClainche's litigation and trial successes include the following notable matters:

- A confidential settlement reached in a medical malpractice case against an interventional cardiologist regarding his controversial practice of using a stent in the mid-popliteal artery to treat arterial occlusion. The case involved the off-label use of a medical device and a surgeon acting outside the scope of his practice.
- A $40 million verdict recovered for a child in a wrongful death case.
- A $5 million settlement reached during trial in a medical malpractice case.
- Verdicts of $1.7 million and $10 million in two separate cases involving sexual abuse of minors.
- A $2.3 million verdict for personal injuries suffered during a fall at an amusement park.
- A $2.8 million verdict for a death and personal injuries suffered by husband and wife in a motor vehicle accident.
- Co-lead of the trial team of lawyers who, after years of costly litigation, successfully recovered $27 million on behalf of 10 victims of child abuse in a case brought in Federal Court in New York.

Mr. LeClainche currently represents clients in a diverse variety of medical malpractice cases, including:

- Several lawsuits involving injuries arising from laparoscopic and open gall bladder surgery.
- A case involving a military reservist suffering from deep vein thrombosis (a clot in the veins of the leg), who was misdiagnosed and as a result suffered a pulmonary embolus and died just as he was being discharged from the hospital.
- A routine colonoscopy that resulted in a perforated colon and the subsequent death of the client.

- Misdiagnosis on colonoscopy resulting in the client being given a clean bill of health only to be subsequently diagnosed with Stage 4 colon cancer.

In addition to his recent admission to the American College of Trial Lawyers, Mr. LeClainche's accomplishments over the years have enabled him to achieve an AV-Preeminent rating from Martindale-Hubbell, the highest rating available for ethics and legal ability from the nation's oldest guide to lawyers and law firms.

Mr. LeClainche attended Florida International University, graduating *magna cum laude* with a B.A. in Political Science, and earned his J.D. from the University of Florida College of Law. Mr. LeClainche was born and raised in Kingston, Jamaica.

Scott Lempert

Scott M. Lempert is Of Counsel at Cohen Milstein and a member of the firm's Employee Benefits (ERISA) Practice Group. He joined the firm in 2016 and represents the interests of employees, retirees, and plan participants and beneficiaries in ERISA cases in the district court and on appeal.

Mr. Lempert is currently engaged in litigating a number of so-called "church plan" lawsuits. These cutting-edge legal cases assert that many non-profit health care systems in the United States wrongfully claim their benefit plans are exempt from ERISA regulation under the church plan exemption. Currently, Cohen Milstein serves as lead or co-lead counsel in 12 separate cases in various jurisdictions throughout the U.S.

Mr. Lempert has over 20 years of experience litigating complex commercial class actions on behalf of employees, retirees and consumers in retiree benefits, employment, consumer protection and antitrust matters. Prior to joining Cohen Milstein he worked on many high-profile matters, including:

- *In re: Unisys Corp. Retiree Medical Benefits ERISA Litig.* – a series of cases involving representation of thousands of retirees, both as class actions and individually, seeking restoration of lifetime retiree medical benefits unlawfully terminated after retirement. These cases successfully achieved multiple settlements and court judgments providing lifetime retiree medical benefits for some and a continuing stream of payments to pay for medical benefits for other retirees.
- *Raetsch v. Lucent Technologies* – 36 million dollar settlement involving unlawful transfer of excess defined benefit pension funds to an account to pay for retiree medical benefits.
- *Mehling v. New York Life Insurance Co*. -- 14 million dollar settlement challenging excessive fees charged to New York Life employees and the company's pension plan for Plan assets invested in New York Life owned mutual funds.
- *Stagi v. National R.R. Passenger Corp*. – Gender discrimination class action alleging unlawful disparate impact on female union employees resulting from enforcement of an Amtrak employee policy that blocked union employees from promotion to management. Settlement provided Amtrak employees compensation for denial of opportunities for promotion and the striking of the unlawful employment policy.

Mr. Lempert graduated Phi Beta Kappa from the University of Delaware with a B.A., magna cum laude, in Psychology, and received his J.D., from the University of Pennsylvania Law School. During law school, he served as Vice President of the Law School Government and was a Morris Fellow.

Christopher Lometti

Christopher Lometti is Of Counsel in the Securities Litigation & Investor Protection Practice Group, having joined Cohen Milstein in 2009. In this role, Mr. Lometti has litigated some of the most significant mortgage-backed securities (MBS) class action lawsuits to emerge from the financial crisis.

Mr. Lometti, together with Joel Laitman, his fellow Partner in the Securities Litigation Practice, initiated the Bear Stearns, Harborview, RALI, Lehman and HEMT MBS litigation at their named firm prior to joining Cohen Milstein. The lawsuits were high-risk matters involving novel claims on behalf of their Taft-Hartley pension fund clients injured by the dramatic downgrades of their MBS holdings from AAA to junk status. The MBS litigations have earned Cohen Milstein's Securities Litigation Practice numerous accolades from the *National Law Journal, Law360* and *American Lawyer.*

Mr. Lometti's successes include the following notable matters:

- Bear Stearns MBS Litigation: $500 million settlement with JPMorgan Chase. Cohen Milstein was lead counsel in a class action lawsuit alleging Bear Stearns violated securities laws in selling toxic mortgage-backed securities that failed to meet the bank's own underwriting standards and that contained false and misleading information as to the appraised values of the underlying mortgages. Mr. Lometti was one of the key litigators in the case, developing strategy and conducting extensive fact discovery into the 22 offerings backed by approximately 71,000 largely Alt-A mortgages that Bear Stearns sold to investors from May 2006 to April 2007.

- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action litigation alleging RALI and its affiliates sold shoddy MBS securities that did not meet the standards of their underwriters. Mr. Lometti was one of the senior litigators on the class action, conducting fact discovery, deposing economic experts and preparing witnesses.

- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team of which Mr. Lometti was a senior litigator.

- HEMT MBS Litigation: $110 million settlement with Credit Suisse. Cohen Milstein was lead counsel in a case alleging Credit Suisse and its affiliates sold toxic securities to pension fund investors. The suit, filed in 2008, was one of the first class action cases involving mortgage-backed securities to be filed.

- Lehman Litigation: $40 million settlement. Cohen Milstein was lead counsel in a class action lawsuit against individuals affiliated with the bankrupt firm, the largest bankruptcy in U.S. history. Mr. Lometti was a senior litigator on the lawsuit, developing strategy.

- Dynex Litigation: $7.5 million settlement. Cohen Milstein was lead counsel in class action lawsuit involving the asset-backed securities. Mr. Lometti was a central member of the team to litigate this seminal lawsuit involving hybrid securities. In the litigation, the U.S. District judge issued one of the first decisions certifying an investor class pursuing fraud claims in connection with the sale of asset-backed securities. The Dynex litigation laid out a road map that could be followed in litigating an asset-backed security.

Currently, Mr. Lometti is litigating the following matters:

- NovaStar MBS: Cohen Milstein is lead counsel in litigation alleging that RBS, Wells Fargo (formerly Wachovia) and Deutsche Bank sold toxic mortgage-backed securities in investors. The litigation is one of the last outstanding class action MBS lawsuits. The Second Circuit Court of Appeals reversed an earlier dismissal of the lawsuit, paving the way for prosecution of the case.

- Volaris Litigation: Cohen Milstein is lead counsel in a class action lawsuit alleging that the Mexican airline Volaris Aviation Holding Co. withheld financial information regarding revenue recognition from investors before the company's $235 million initial public offering. Soon after the IPO, the news came to light and the stock fell roughly 15%. The case is ongoing.

- Braskem Litigation: Cohen Milstein represents shareholders in a class action suit alleging that the Brazilian petrochemical company lied to investors in its American Depository Receipts about its role in a bribery scheme involving Petrobras, Brazil's giant oil producer. The case is ongoing.

Mr. Lometti received a Bachelor of Arts from Fordham College in 1983, and his J.D. from Fordham Law School in 1986.

Prior to his arrival at Cohen Milstein, Mr. Lometti played a substantive role in litigating and settling the massive class action suit against WorldCom, one of the largest bankruptcies in history, representing significant stakeholders in the telecom's bond offerings. The lawsuit resulted in a settlement of $6.15 billion.

He has served as a non-industry arbitrator for the New York Stock Exchange and National Association of Securities Dealers helping to resolve disputes, and as a mediator for the New York State Court System.

Diana L. Martin

Diana L. Martin is Of Counsel at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death, Consumer Protection, Managed Care Abuse, and Unsafe & Defective Products practice groups. She concentrates her practice on appellate litigation involving complex product liability, consumer class, mass tort and managed care litigation by not only handling appeals for the firm in these areas, but also by providing appellate support at the trial stage. In that role, she drafts and argues complex and case dispositive motions, handles jury instruction charge conferences and assists trial counsel in preserving and protecting the record in the event of an appeal.

Of notable interest is Ms. Martin's success in achieving justice for injured workers who have been wrongfully denied medical care and treatment by their employer or their employer's workers' compensation carrier, resulting in the employee suffering injuries in addition to those suffered in the workplace accident. While many attorneys refuse to litigate such cases given the difficulty of navigating around the legal immunity afforded to defendants by Florida law, Ms. Martin has gotten many of these cases past the motion to dismiss and summary judgment stages, resulting in settlement of the workers' claims prior to trial.

Currently, Ms. Martin is helping the firm litigate the following matters:

- *United States of America, et al. v. AIDS Healthcare Foundation, Inc.*: Cohen Milstein represents three former managers of the AHF in a Federal and Florida State Whistleblower Act claims against the

nation's largest provider of HIV/AIDS medical care for illegal patient referral kickbacks. Ms. Martin has been involved in all aspects of the litigation. The case is ongoing.

- HCA: Cohen Milstein is lead counsel in a class action lawsuit alleging that four Florida plaintiffs and others like them were billed inflated and exorbitant fees for emergency radiology services, in excess of the amount allowed by law, covered in part by their mandatory Florida Personal Injury Protection insurance. When the district court struck plaintiffs' class claims, Ms. Martin successfully petitioned the Eleventh Circuit Court of Appeals to accept immediate appellate review.
- Wal-Mart Employment Discrimination Litigation: Ms. Martin assisted the firm's Civil Rights and Employment practice group in a regional gender bias case in the Southern District of Florida alleging that Wal-Mart discriminates against women in pay and promotion decisions. After settlement agreements were reached on behalf of the individual plaintiffs, Ms. Martin has taken the lead role in appealing to the Eleventh Circuit Court of Appeals the district court's order dismissing as time-barred the plaintiffs' class claims, which originated from the seminal case of*Dukes v. Wal-Mart*.
- *Adams v. Palm Beach County Sheriff's Office:* Cohen Milstein is lead counsel in an excessive force and wrongful death action against the Palm Beach County Sheriff's Office and one of its detectives, who shot and killed the unarmed Seth Adams while he was on family property. Having provided legal support throughout the district court proceedings, Ms. Martin is currently handling the appellate proceedings in which the officer has appealed to the Eleventh Circuit Court of Appeals the district court's denial of his motion for summary judgment based on qualified immunity.

Some of her past successes include:

- *Mincey v. Takata:* Cohen Milstein was is lead counsel in a lawsuit brought on behalf of Patricia Mincey and her family, a Florida woman who sustained catastrophic injuries that rendered her a quadriplegic in 2014 when the driver's side airbag in her Honda Civic deployed too aggressively during a collision due to a product defect. Patricia Mincey passed away in early 2016 due to complications from her quadriplegia. The suit charged that Takata, the manufacturer of the airbag system, knew of the airbag defect and hid the problem from consumers. When the defendants removed Ms. Mincey's case to federal court in an attempt to have it bogged down in multi-district litigation, Ms. Martin successfully had the case remanded to Florida state court, where it is was resolved in July 2016.

Prior to joining the firm in 2014, Ms. Martin served as appellate counsel to Leopold Law, P.A., in Palm Beach Gardens, FL. Before that, she clerked for three years for the Honorable Martha C. Warner in Florida's Fourth District Court of Appeal. Ms. Martin attended Flagler College, graduating *summa cum laude* and being awarded Departmental Honors in Philosophy/Religion. She earned her J.D. from the University of Florida Levin College of Law, graduating with High Honors and achieving admission to the Order of the Coif.

Ms. Martin currently serves as President of Florida Legal Services, serves as Audit Committee Chair of Families First of Palm Beach County, and sits on the board of the Florida Bar Foundation. She has written numerous legal articles, which have been published in a variety of journals, including *Trial Magazine*, *The Florida Bar Journal*, and the *Florida Justice Association Journal*. Ms. Martin also co-authors *Florida Insurance Law and Practice*, an annual publication by Thomson/West.

Douglas J. McNamara

Douglas J. McNamara is Of Counsel at Cohen Milstein, and a member of the firm's Consumer Protection practice group. In that role, Mr. McNamara specializes in litigating complex, multi-state class action lawsuits against manufacturers and consumer service providers such as banks, insurers, credit card companies and others. He has helped litigate precedent-setting cases, including *Salud Services, Inc. v. Caterpillar, Inc.* He is a hands-on litigator who takes pleasure in the details, facts, and documents of each case. Mr. McNamara is a highly regarded speaker who has presented at several forums on such topics as federal preemption, class certification and civil litigation, and is the author of scholarly articles focusing on emerging legal issues.
Mr. McNamara has worked on numerous cases involving dangerous pharmaceuticals and medical devices, light cigarettes, defective consumer products, and environmental torts. He litigated and resolved the class action lawsuit against Philips Electronics North America Corp., which alleged that certain Philips and Magnavox flat-panel TVs suffer from a defect that causes their capacitors to fail prematurely and renders the TVs inoperable.

Mr. McNamara is currently litigating the following notable matters:

- Lumber Liquidators Litigation: Cohen Milstein is co-lead counsel in the consumer class action lawsuit *In re: Lumber Liquidators Chinese-Manufactured Flooring Products, Sales Practice and Product Liabilities Litigation*, alleging the nationwide retailer sold Chinese-made laminate flooring containing hazardous levels of the carcinogen formaldehyde while falsely labeling their products as meeting or exceeding California emissions standards, a story that was profiled twice on 60 Minutes in 2015.
- Symantec Litigation: Cohen Milstein is lead counsel in *Khoday et al. v. Symantec Corp. et al.,* a nationwide class action battle involving the marketing to consumers of a re-download service in conjunction with the sale of Norton software. The case settled in a $60 million all-cash deal a month before the case was to go to trial – one of the most significant consumer settlements in years. Mr. McNamara was involved in all aspects of the case, from managing the litigation to overseeing a staff of contract attorneys to settlement discussions.
- Rooms to Go Litigation: Cohen Milstein represents a putative class in *Hankinson et al. v. R.T.G. Furniture Corp., d/b/a Rooms to Go,* alleging that the furniture retailer misled consumers as to the application of its ForceField stain protection plan. Mr. McNamara is engaged in all aspects of the litigation, including discovery and working with expert witnesses.
- Caterpillar Litigation: Cohen Milstein is lead counsel in *Salud Services, Inc. v. Caterpillar, Inc.*, a class action lawsuit against Caterpillar alleging that bus engines designed to meet 2002 federal emissions standards are failing, leaving passengers stranded and bus companies eating the costs of countless repairs and towing fees. The Firm succeeded in beating back the defendant's argument that the Clean Air Act preempted the plaintiff's claims since the claims related to emissions standards. Mr. McNamara was the architect of that opposition and is involved in all aspects of the product liability litigation.

Prior to joining Cohen Milstein in 2001, Mr. McNamara was a litigation associate at an international law firm, specializing in pharmaceutical and product liability cases. He started his career at New York City's Legal Aid Society, defending indigent criminal defendants at trial and on appeal.

He has been the lead author on three law review articles: "Buckley, Imbler and Stare Decisis: The Present Predicament of Prosecutorial Immunity and An End to Its Absolute Means,: 59 *Albany Law Review*, 1135 (1996); "Sexual Discrimination and Sexual Misconduct: Applying New York's Gender-Specific Sexual

Misconduct Law to Minors," 14 *Touro Law Review*, 477 (Winter 1998), and most recently, Douglas McNamara, et al, "Reexamining the Seventh Amendment Argument Against Issue Certification," 34 *Pace Law Review*, 1041 (2014). He is presently teaching a course on environmental and toxic torts as an adjunct at George Washington University School of Law.

Mr. McNamara graduated *summa cum laude* from SUNY Albany with a major in Political Science, and earned his J.D. from New York University School of Law.

Miriam Nemeth

Miriam R. Nemeth is an Associate in Cohen Milstein's Civil Rights & Employment practice group. Ms. Nemeth's practice focuses on civil rights, employment discrimination, and wage and hour cases. In addition, she has experience litigating cases involving police misconduct, government abuse of power, and prisoners' rights.
Prior to joining Cohen Milstein in 2015, Ms. Nemeth practiced at a civil rights litigation boutique in Detroit. Among the cases she litigated there was a race discrimination lawsuit against a police department on behalf of five African-American men who were the victims of gang violence, as well as a racial profiling claim on behalf of a woman who was removed from an airplane based on her race. She also represented a jail inmate who suffered lasting damages from a corrections officer's assault, and a family who received false information about the death of their son during his employment with a private security contractor.

Following law school, Ms. Nemeth served as a law clerk for the Honorable Ronald Lee Gilman on the Sixth Circuit Court of Appeals and the Honorable David M. Lawson on the Eastern District of Michigan.

Currently, Ms. Nemeth is involved in the following notable matters:

- McDonald's Litigation: Cohen Milstein represents McDonald's crew members in several wage and hour lawsuits asserting that McDonald's regularly fails to pay workers for all the hours they work by denying them legally mandated meal and rest breaks, payments for missed breaks, and assistance with uniform maintenance, amongst other claims.
- Temporary Employment Staffing Agency Litigation: Cohen Milstein represents African American workers in a series of class actions against employment staffing agencies in Chicago. The suits allege a pattern of race discrimination against African American laborers in the staffing and assignment of workers by temporary staffing agencies to their client companies.
- Transgender Health Care Coverage Cases: Cohen Milstein represents LGBT individuals in their claims of sex discrimination in the denial of access to health care coverage for transition-related care.
- Pro Bono: Ms. Nemeth has a strong commitment to pro bono work and currently represents a Washington, D.C., resident in her application for disability benefits for a debilitating genetic condition.

Ms. Nemeth is a graduate *cum laude* of the University of Pennsylvania Law School. There, she served as a Comments Editor on the *University of Pennsylvania Law Review* and co-directed the Prisoners' Legal Education Project, a student-run clinic that worked with inmates. She also received the 2009 Benjamin R. Jones Memorial Award for Contributions to the Public Interest. During law school, Ms. Nemeth interned with the Capital Habeas Unit of the Federal Community Defender Office in the Eastern District of Pennsylvania, the Bazelon Center for Mental Health Law and the D.C. Public Defender Service's Mental Health Division. Before

attending law school, Ms. Nemeth graduated *summa cum laude* from the George Washington University's Honors Program with a double-major in English and Psychology.

Ms. Nemeth is an active member of the American Constitution Society and has been named a Next Generation Leader and a Public Interest Fellow by that organization.

Casey M. Preston

Casey M. Preston is a member of Cohen Milstein's Whistleblower/False Claims Act Practice Group. Mr. Preston represents whistleblowers nationwide in qui tam litigation, involving numerous industries, such as health care, defense, financial services, and government procurement. He also represents individuals who report tax fraud, securities fraud, and customs fraud through federal whistleblower programs. In addition, Mr. Preston has significant experience handling complex commercial cases and securities litigation in courts across the U.S. Some of Mr. Preston's current representations include:

- A sealed qui tam action related to a drug manufacturer's alleged use of illegal marketing practices to increase usage of its drug by Medicare beneficiaries.
- A sealed qui tam action against importers alleged to have engaged in tariff fraud.
- A sealed qui tam action involving claims that hospitals overcharged the government health care programs by misclassifying outpatient services as inpatient services.
- A sealed qui tam action against a chain of medical practices that allegedly performed unnecessary tests on patients covered by the government health care programs and billed the government for services that were not performed.
- A sealed qui tam action alleging that a medical equipment supplier is selling unnecessary equipment and supplies to Medicare beneficiaries.
- A sealed qui tam action involving claims that a provider of mental health rehabilitative services up-coded services provided to Medicaid beneficiaries.

Mr. Preston has played a key role in a number of successful cases, including:

- A qui tam action alleging that drug manufacturer Wyeth overcharged the state Medicaid programs by not providing them the statutorily required "best price" for a widely prescribed drug. This action resulted in a recovery of more than $780 million by the government.
- A qui tam action against a chain of urgent care centers that allegedly billed the government for unnecessary testing performed on beneficiaries of the government health care programs. There was a $10 million recovery by the government.
- A sealed qui tam action against a dental group for performing unnecessary dental procedures on Medicaid beneficiaries.
- Represented the limited partner of several commercial real estate partnerships in a fraud and breach of fiduciary duty action against the partnerships' general partner.
- Represented stock and bondholders in a class action against a food distributor and its outside accounting firm that resulted in a $90+ million recovery for the investors.
- Represented stockholders in a securities class action against a software company that resulted in a $5+ million recovery for the investors.
- Represented a hedge fund in a securities fraud action against a marketing company through which the hedge fund secured a $4 million recovery.

- Represented a state pension fund in a securities class action against an insurance company that resulted in a $90+ million recovery for stockholders.

In addition, Mr. Preston has provided pro bono services to the Legal Clinic for the Disabled and the Brady Center to Prevent Gun Violence.

Mr. Preston served as law clerk for the Hon. William J. Nealon, U.S. District Court for the Middle District of Pennsylvania and the Hon. Terrence R. Nealon, Court of Common Pleas, Lackawanna County, Pennsylvania. Mr. Preston received his B.S. from The Citadel and his J.D. from the Villanova University School of Law.

Poorad Razavi

Poorad Razavi is an Associate at Cohen Milstein, and a member of the firm's Catastrophic Injury & Wrongful Death and Unsafe & Defective Products practice areas. Mr. Razavi's practice focuses on products liability, vehicle defects, roadway design and maintenance defects, trucking and car accidents, negligent security, and multi-million dollar wrongful death and catastrophic injury suits.

Mr. Razavi began his practice as an insurance defense attorney working side-by-side with insurance adjusters, which provides his clients the benefit of an advocate with a unique perspective into the mindset of insurance companies and corporate defendants, and with a distinct understanding about how to maximize the value of a claim in order to ensure that his clients receive maximum compensation for their injuries.

Thereafter prior to joining Cohen Milstein, Mr. Razavi was a senior associate at another prestigious personal injury products liability firm. While there, Mr. Razavi represented clients across the nation, including in Florida, California, Indiana, Ohio, Georgia, New York, Nevada, Michigan, Alabama, and Tennessee. He has litigated claims against all of the major insurance carriers, as well as automobile, tire, and component part manufacturers, including General Motors, Honda, Chrysler, Takata, and Continental. Mr. Razavi has also handled a broad range of non-traditional personal injury and wrongful death cases throughout the country, including claims involving chemical and pesticide exposure, chlorine gas exposure, mold exposure, construction defect, boating defect, negligent vehicle repairs, and negligent tractor-trailer operation.

Mr. Razavi also has extensive experience in claims against the Department of Transportation and other private state contractors for roadway design and defect claims, and has litigated multiple roadway design and maintenance defect claims resulting in multi-million dollar settlements and subsequent installation and remediation of guardrails, re-paving, curbing, and rehabilitation of roadways in multiple counties.

Additionally, Mr. Razavi initiated the investigation and discovery of a major vehicle airbag defect resulting in the filing of a subsequent class action against the world's largest automobile manufacturers, in which he was selected to the class action discovery committee.

Mr. Razavi has been featured in multiple publications for his successful results in fighting against the automobile industry as well as for handling claims of defective roadway design both in Florida and throughout the country. He has proudly served the legal and local community, holding several prominent Bar Association leadership positions and continually being actively involved as a speaker and moderator on a variety of legal topics. He has repeatedly been selected as "Rising Star" by Florida Super Lawyers and a "Legal Elite Up and Comer" by Florida Trend Magazine.

Mr. Razavi graduated from Indiana University with a B.S. in International Business and Business Economics. He received his J.D. from the University of Cincinnati College of Law and was a Merit Scholarship recipient.

Kenneth M. Rehns

Kenneth M. Rehns is an Associate in the Securities Litigation & Investor Protection Practice Group, having joined Cohen Milstein in 2009. In this role, Mr. Rehns has been a key member of the team that initiated and litigated the most important mortgage-backed securities (MBS) class action lawsuits to emerge from the financial crisis.

Among his successes are the following litigations:

- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action lawsuit alleging that RALI and its associates sold toxic mortgage-backed securities that failed to meet their own underwriting standards. One of the earliest MBS cases to be brought in 2008, Mr. Rehns was involved with all aspects of the litigation from its inception.
- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team. Mr. Rehns was lead Associate in the case, responsible for fact discovery and for overseeing some 30 contract attorneys and support staff.
- HEMT MBS Litigation: $110 million settlement with Credit Suisse. Cohen Milstein was lead counsel in a case alleging Credit Suisse and its affiliates sold toxic securities to pension fund investors. Mr. Rehns, who was with the lawsuit from its inception, was deeply involved in briefing and discovery.
- IntraLinks Litigation: $14 million settlement. Cohen Milstein was co-lead in a class action lawsuit alleging that IntraLinks, a virtual data room provider, misrepresented the strength of its largest business segment, having lost its most important customer, the FDIC. Mr. Rehns was the lead Associate on the litigation, a case calling for multiple depositions, deep discovery and review of millions of pages of documents.

Currently, Mr. Rehns is litigating the following notable matters:

- Braskem: Cohen Milstein represents the company's American Depositary Receipts shareholders in a class action lawsuit alleging that Braskem, one of Brazil's biggest petrochemical providers, lied to shareholders about its role in the bribery scandal involving Petrobras, the country's oil producing giant. The case is ongoing.
- BioScrip Shareholder Derivative Litigation: Cohen Milstein is co-lead counsel seeking to hold the company's board and management accountable for a pharmaceutical drugs kickback scheme. Mr. Rehns is responsible for briefing and will be responsible for discovery as the litigation progresses. The case is ongoing.
- Broadcom Litigation: Cohen Milstein is co-lead counsel in a class action lawsuit challenging the fairness of the proposed merger terms between Avago and Broadcom. Mr. Rehns is the sole Associate on the case. He has drafted the complaint and will be responsible for discovery and briefing going forward. The case is ongoing.

Mr. Rehns attended George Washington University, graduating cum laude with a B.B.A. in Business and Economics, and earned a J.D., cum laude, at Syracuse University College of Law, where he was an Editor of the Syracuse Journal of International Law and Commerce.

Raymond M. Sarola

Raymond M. Sarola is an Associate at Cohen Milstein, and a member of the Firm's Whistleblower/False Claims Act and the Ethics and Fiduciary Counseling practice groups. Mr. Sarola represents whistleblowers in cases brought under the federal and state false claims acts in a wide range of industries that conduct business with the government, including health care, defense and financial services. As a member of the Firm's Ethics and Fiduciary Counseling practice, Mr. Sarola calls on his experience as a trustee on the New York City pension fund boards in counseling public pension funds fiduciary issues.
Mr. Sarola's experience includes both government service and corporate litigation. Prior to joining the firm, he served as Senior Policy Advisor & Counsel in the Mayor's Office of the City of New York. While there, he represented the Mayor and Commissioner of Finance on the boards of the City's pension systems and deferred compensation plan and advised on legal issues regarding pension investments, benefit payments, securities litigation and corporate governance initiatives. Previously, Mr. Sarola was a litigation associate at a noted defendants' firm, where he represented companies and individuals in securities and other complex commercial litigation, internal investigations and antitrust matters.

Most recently, Mr. Sarola assisted in the qui tam action against the pharmaceutical company Wyeth pending in the District of Massachusetts, in which more states joined to intervene along with the government of the United States than have ever intervened in a qui tam action in history. (United States of America et al., ex rel. Lauren Kieff, v. Wyeth, No.1:03-CV-12366-DPW [D.Mass.].) The $784.6 million settlement was the seventh-largest False Claims Act recovery on record and the second-largest recovery involving a class of drugs in history.

Mr. Sarola has published articles on whistleblower issues, including the use of statistical sampling to prove large fraud cases. He has also published and spoken at conferences on pension fund fiduciary issues, in particular the SEC's pay-to-play rule. He is a member of Taxpayers Against Fraud, a nonprofit, public interest organization dedicated to combating fraud against the Federal Government through the promotion and use of the False Claims Act.

Mr. Sarola received his B.A. from the University of North Carolina at Chapel Hill, and earned his J.D. from the University of Pennsylvania Law School, where he also earned a Certificate of Study in Business and Public Policy from the Wharton School. While in law school, he was a Summer Intern for the Honorable Clarence Newcomer, United States District Court for the Eastern District of Pennsylvania.

Daniel Silverman

Daniel H. Silverman is an Associate and a member of the Antitrust Practice Group at Cohen Milstein, having joined the firm in 2012. Mr. Silverman has prosecuted class actions on behalf of both consumers and employees in a variety of industries in courts around the country. Among his successes, Mr. Silverman has helped litigate the following matters:

- Plasma-Derivative Protein Therapies Antitrust Litigation: Cohen Milstein was co-lead counsel for plaintiffs alleging a conspiracy to reduce the supply and increase prices of IVIG and Albumin—life-saving therapies derived from blood plasma. The lawsuit was resolved for $128 million to compensate customers who were overcharged for these vital therapies.
- Domestic Drywall Antitrust Litigation: Cohen Milstein is co-lead counsel in an antitrust litigation alleging that the seven major U.S. manufacturers of drywall conspired to manipulate prices. To date, settlements for $45 million have been reached with two of the defendants.
- VFX/Animation Workers: In *In re Animation Workers Antitrust Litigation* (N.D. Cal.), Mr. Silverman serves as co-lead counsel representing a class of animation and visual effects workers in a lawsuit alleging that the defendants, who include Pixar, Lucasfilm Ltd. and DreamWorks Animation, secretly agreed not to solicit class members and to coordinate on compensation.

Prior to joining the firm, Mr. Silverman served as the Executive Director of Legal Economics, LLC, a Cambridge, Massachusetts-based firm specializing in the analysis of complex economic issues related to legal issues. At Legal Economics, he supported expert economic testimony in a variety of antitrust matters involving horizontal price-fixing, mergers, and loyalty discounts in industries ranging from health care and computer hardware to live music promotion. His experience at Legal Economics provides him with unique insight into the inner workings of expert testimony in antitrust matters. In addition, Mr. Silverman has represented public sector clients before the Federal Energy Regulatory Commission, state public utility commissions, and federal appellate courts.

Mr. Silverman is a magna cum laude graduate of Brown University, with a B.S. in Physics, where he was elected to Phi Beta Kappa. He earned a J.D., magna cum laude, from Harvard Law School. In law school, he served as a Managing Editor of the Harvard Environmental Law Review. Mr. Silverman also served as a summer associate at the U.S. Department of Justice in the Environment and Natural Resources Division, Law and Policy Section.

Richard A. Speirs

Richard A. Speirs is Of Counsel at Cohen Milstein, having joined the firm's Securities Litigation & Investor Protection practice group in 2010. He worked on many of the mortgage-backed securities fraud cases that were successfully litigated by the firm. Currently, in addition to litigating securities fraud cases, Mr. Speirs is principally responsible for developing and litigating the firm's derivative and merger-related lawsuits.
Since joining the firm, Mr. Speirs has litigated the following notable matters:

- Bear Stearns Mortgage Pass-Through Certificates Litigation: $505 million settlement by JPMorgan Chase & Co. to settle a class action litigation arising from Bear Stearns' sale of $27.2 billion of mortgage-backed securities that proved defective during the U.S. housing and financial crises.
- RALI MBS Litigation: $335 million settlement with Citigroup, Goldman Sachs and UBS. Cohen Milstein was lead counsel in a class action litigation alleging RALI and its affiliates sold shoddy MBS securities that did not meet the standards of their underwriters. Mr. Speirs was a critical member of the team of litigators, conducting fact discovery, deposing economic experts and preparing witnesses.
- Harborview MBS Litigation: $275 million settlement with Royal Bank of Scotland. Cohen Milstein was lead counsel in a complex case, in which presiding Judge Loretta A. Preska, of the U.S. District Court, Southern District of New York, commented on the "job well done" by the Cohen Milstein team.

- Sino-Forest Corp. Securities Litigation: Cohen Milstein served as lead counsel for U.S. investors in securities fraud class action brought on behalf of investors in Sino-Forest Corp., a Canadian corporation, which achieved $150 million in settlements from numerous defendants.
- Ebix Derivative Litigation: Cohen Milstein was lead counsel in a class action lawsuit alleging that Ebix's board of directors breached their duties to shareholders in misrepresenting the company's financial results and organic growth and in internal controls over financial reporting. The settlement resulted in the adoption of significant corporate governance improvements including the appointment of a Lead Independent Director, increasing the number of directors on the corporate governance committee, and creating a director of audit and director of internal tax positions to report directly to the Audit Committee.
- Dynex Capital Securities Fraud Litigation: Cohen Milstein was lead counsel in a class action suit alleging that Dynex Capital, a real estate investment trust, lied about the quality of mobile loans used as collateral for asset-backed loans sold to investors. The $7.5 million settlement is significant in having provided a road map for future asset-backed securities class action litigation.

Mr. Speirs' current notable matters include:

- Bank Leumi Derivative Litigation: $400 million derivative suit against the directors and officers of Bank Leumi, an Israeli bank, asserting that bank officers violated their fiduciary duties in conspiring to aid American taxpayers in hiding income from the IRS.
- Intuitive Surgical Inc. Derivative Litigation: Pending derivative action against the company's directors and officers, asserting breaches of fiduciary duties and insider trading claims in connection with concealing regulatory compliance problems and safety defects in the company's flagship product, the da Vinci robotic surgery system.
- BioScrip Derivative Litigation: Derivative action alleging that BioScrip's directors and officers disregarded regulatory and compliance requirements while engaging in a scheme in which the company accepted illegal kickbacks from Novartis Pharmaceuticals Corp. on the sale of a dangerous Novartis drug resulting in government investigations, penalties and other sanctions.

In a career spanning more than 30 years, Mr. Speirs has been lead or co-lead attorney in a number of securities class actions where the court has issued an important decision under the federal securities laws. Among the issues decided were: the improper grouping of unaffiliated investors in a lead plaintiff motion; recommendation of default sanction against auditing firm for discovery misconduct involving electronic audit work papers; and liability under Section 10(b) of a non-issuer for disclosures made by the issuer.

Mr. Speirs has appeared on numerous panels and legal events to discuss securities fraud and investor protection. He attended Brooklyn College of the City University of New York, where he received a B.A., *cum laude*, and earned his J.D. at Brooklyn Law School, where he earned the Order of the Coif.

Catherine A. Torell

Catherine A. Torell is the Director of Securities Research and Analysis at Cohen Milstein, and is a member of the Securities Litigation & Investor Protection Practice Group. As Director of Securities Research and Analysis, Ms. Torell has the exclusive role of analyzing every securities case that is brought to the Firm.

In this role, Ms. Torell is responsible for thoroughly researching the factual and legal merits of all of the federal securities fraud class action filed in the United States. On the basis of her research, she generates written analyses to evaluate the merits of each case for the Firm's Case Evaluation Committee and assesses the potential importance of the case to the Firm's clients. Ms. Torell also prepares the written analyses that are sent to the Firm's institutional clients. Those analyses describe and evaluate the merits of the cases in which those clients have sustained substantial losses and include a recommendation regarding as to whether the Firm believes the client should pursue a lead plaintiff role in the case. Since joining Cohen Milstein in 2002, she has played an integral role in helping to significantly expand the Firm's client base.

In addition to the foregoing, Ms. Torell has played also participated in litigating some of the Firm's most important cases, including such notable matters as:

- In re Parmalat Securities: $90 million settlement. Cohen Milstein was co-lead counsel in a class action lawsuit involving Parmalat, a company often referred to as "Europe's Enron." The litigation involved the biggest fraud in European history, in which revenues were manufactured out of thin air and numerous Parmalat executives were indicted and went to prison. The litigation included settlements with the company's two outside auditors. Ms. Torell was an important member of the litigation team, helping to prepare pleadings and motions papers in the case.

Ms. Torell, joined the Firm in 2002 and has been practicing law for 25 years. Prior to joining Cohen Milstein, Ms. Torell was counsel at a number of prominent plaintiffs' class action firms, serving in co-lead and leadership positions in numerous successful class action cases that resulted in settlements collectively totaling hundreds of millions of dollar for the clients she represented. She served as a co-lead counsel in In re Providian Financial Securities Litigation, which resulted in a $38 million settlement. In approving the settlement, the Court remarked on the "extremely high quality" and "skill and efficiency" of plaintiffs' counsel's work throughout the litigation.

Ms. Torell attended Stony Brook University, receiving a B.A., magna cum laude, in Political Science, and earned her J.D. from St. John's University School of Law, where she was the recipient of the Federal Jurisprudence Award.

Times Wang

Times Wang is an Associate at Cohen Milstein and a litigator in the firm's Securities Litigation & Investor Protection practice group. Before joining Cohen Milstein in 2014, Mr. Wang was an associate at a top-tier litigation firm in California.

Currently, Mr. Wang is litigating the following matters:

- Harman Industries International Inc. Securities Litigation: Mr. Wang is a member of the Cohen Milstein team litigating a class action suit against Harman International Industries, Inc., in which Cohen Milstein was successful in obtaining a ruling by the D.C. Court of Appeals for the D.C. Circuit reversing the dismissal of the case and remanding it to the U.S. District Court for further proceedings. The ruling represents a significant win for investors in that it limits the scope of protection afforded by the so-called "safe harbor" for forward-looking statements in the Private Securities Litigation Reform Act of 1995. Mr. Wang was the principal drafter of the briefs in the successful appeal.

- BP Securities Litigation: A class action lawsuit arising out of the disastrous Deepwater oil spill in the Gulf of Mexico. Among other things, the lawsuit alleges that BP misled investors about the severity and financial impact of the Deepwater spill. The U.S. Court of Appeals for the Fifth Circuit recently affirmed class certification for those allegations. Cohen Milstein is co-lead counsel in the litigation, which is ongoing. Mr. Wang joined the litigation team as it headed towards trial.

His successes include:

- HEMT MBS Litigation: $110 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that Credit Suisse sold shoddy mortgage-backed securities, which did not meet underwriting standards, to investors. Mr. Wang was a key member of the Cohen Milstein team from depositions through summary judgment and Daubert briefing. During summary judgment and Daubert briefing, Mr. Wang was particularly focused on loss causation issues, working closely with an outside economics expert.
- ITT Educational Services Inc. Securities Litigation: $16.96 million settlement. Cohen Milstein was lead counsel in a class action lawsuit alleging that ITT and two officers misrepresented and omitted ITT's liabilities under certain risk-sharing agreements it had entered into with third-party student loan lenders. Mr. Wang was responsible for the class certification briefing, working extensively with the firm's outside economics expert.
- U.S. Navy Humanist Chaplain Litigation: Mr. Wang, along with other Cohen Milstein attorneys, represented Jason Heap, a humanist who sued the U.S. Navy for rejecting his application to become a chaplain on the basis of his humanist beliefs. After hard-fought discovery, during which Mr. Wang took the depositions of several senior U.S. Navy officials, the case settled.

Mr. Wang is a graduate of McGill University in Montreal, where he earned a B.A. in East Asian Studies, with Great Distinction, in 2007. He earned his J.D., *cum laude*, from New York University School of Law in 2011, serving as Articles Editor for the *Annual Survey of American Law*. During law school, Mr. Wang interned at Human Rights in China and served as Human Rights Chair of NYU's Asia Law Society.

Jessica Weiner

Jessica Weiner is an Associate at Cohen Milstein, and a member of the Antitrust practice group. In this role, Ms. Weiner represents a broad range of individuals and businesses in civil litigation, with a focus on multi-district class actions and antitrust litigation.

Prior to joining the firm, Ms. Weiner clerked for the Honorable Helene N. White of the U.S. Court of Appeals for the Sixth Circuit. She also clerked for the Honorable Lawrence E. Kahn of the U.S. District Court for the Northern District of New York.

Ms. Weiner graduated from Cornell University with a B.A. in Industrial and Labor Relations in 2009. She received her J.D. from Harvard Law School, *cum laude*, in 2014. During law school, Ms. Weiner served as an Article Editor and Online Editor of the Harvard Journal of Law & Gender.

Ms. Weiner is not admitted in the District of Columbia; her practice is under the supervision of partners of the firm.

EXHIBIT B

EXHIBIT B

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

Firm Name: Cohen Milstein Sellers & Toll, PLLC

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Small, Daniel (P)											0.30				0.30	$870	$261.00
Brown, Benjamin, D. (P)										7.10					7.10	$740	$5,254.00
Johnson, Brent (P)			7.70					1.00			11.70				20.40	$685	$13,974.00
Cormier, Christopher, J. (P)								45.20							45.20	$680	$30,736.00
Farah , George, F. (P)			5.00												5.00	$645	$3,225.00
Young, David, A. (P)			44.00								0.30				44.30	$600	$26,580.00
Levens, Emmy (P)			8.70					51.60			5.30				65.60	$575	$37,720.00
Gutierrez, Alicia (SA)			53.20				495.30								548.50	$350	$191,975.00
Henry, Collier (CA)							153.60								153.60	$350	$53,760.00
Prince, Joshua (SA)			56.80												56.80	$350	$19,880.00
Gentile, Meghan (SA)							430.60								430.60	$350	$150,710.00
Sung, Jack (CA)							432.00								432.00	$325	$140,400.00
Bush, Brenna (SA)							496.30	4.30							500.60	$320	$160,192.00
Kitchen, Kristena (CA)							628.30								628.30	$300	$188,490.00
SUB-TOTAL	**-**	**-**	**175.40**	**-**	**-**	**-**	**2,636.10**	**102.10**	**-**	**7.10**	**17.60**	**-**	**-**	**-**	**2,938.30**		**$1,023,157.00**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**175.40**	**0.00**	**0.00**	**0.00**	**2636.10**	**102.10**	**0.00**	**7.10**	**17.60**	**0.00**	**0.00**	**0.00**	**2938.30**		**$1,023,157.00**

EXHIBIT C

EXHIBIT C

In re Lithium Batteries Antitrust Litigation

COHEN MILSTEIN SELLERS & TOLL, PLLC

ATTORNEYS	DATE RANGE	HOURLY RATE
Brown, Benjamin, D.	6/1/2013 to 12/31/2013	$610
Johnson, Brent	6/1/2013 to 12/31/2013	$530
Farah , George, F.	6/1/2013 to 12/31/2013	$480
Small, Daniel	01/01/2014 to 12/31/2014	$795
Brown, Benjamin, D.	01/01/2014 to 12/31/2014	$665
Cormier, Christopher, J.	01/01/2014 to 12/31/2014	$605
Johnson, Brent	01/01/2014 to 12/31/2014	$595
Farah , George, F.	01/01/2014 to 12/31/2014	$555
Levens, Emmy	01/01/2014 to 12/31/2014	$475
Gutierrez, Alicia, R.	01/01/2014 to 12/31/2014	$350
Henry, Collier	01/01/2014 to 12/31/2014	$405
Gentile, Meghan	01/01/2014 to 12/31/2014	$345
Bush, Brenna	01/01/2014 to 12/31/2014	$310
Kitchen, Kristena	01/01/2014 to 12/31/2014	$300
Brown, Benjamin, D.	01/01/2015 to 12/31/2015	$685
Johnson, Brent	01/01/2015 to 12/31/2015	$620
Young, David, A.	01/01/2015 to 12/31/2015	$530
Levens, Emmy	01/01/2015 to 12/31/2015	$500
Gutierrez, Alicia	01/01/2015 to 12/31/2015	$350
Prince, Joshua	01/01/2015 to 12/31/2015	$350
Sung, Jack	01/01/2015 to 12/31/2015	$325
Young, David, A.	01/01/2016 to 12/31/2016	$560
Prince, Joshua	01/01/2016 to 12/31/2016	$350
Gutierrez, Alicia	01/01/2016 to 12/31/2016	$350

EXHIBIT D

(REDACTED)

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
7/1/2013	38	Farah , George, F.	3	Drafting Discovery Answers/Responses	1.00	$480	480.00	[redacted]
9/19/2014	38	Farah , George, F.	3	Drafting Discovery Answers/Responses	2.00	$555	1,110.00	Obtain materials[redacted]
9/22/2014	38	Farah , George, F.	3	Drafting Discovery Answers/Responses	1.00	$555	555.00	Obtain materials[redacted]
9/24/2014	38	Farah , George, F.	3	Drafting Discovery Answers/Responses	1.00	$555	555.00	[redacted]
6/5/2013	241	Brown, Benjamin, D.	10	Class certification/Experts	0.50	$610	305.00	[redacted]
3/13/2014	241	Brown, Benjamin, D.	10	Class certification/Experts	1.80	$665	1,197.00	[redacted]
7/6/2015	241	Brown, Benjamin, D.	10	Class certification/Experts	0.70	$685	479.50	[redacted]
7/8/2015	241	Brown, Benjamin, D.	10	Class certification/Experts	0.50	$685	342.50	[redacted]
7/14/2015	241	Brown, Benjamin, D.	10	Class certification/Experts	0.80	$685	548.00	[redacted]
6/30/2015	241	Brown, Benjamin, D.	10	Class certification/Experts	2.80	$685	1,918.00	[redacted]
5/22/2014	257	Small, Daniel	11	Litigation Strategy Analysis & Case Management	0.30	$795	238.50	TC w/ Pierson re contract atty staffing.
7/3/2014	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	0.50	$475	237.50	Meet with B. Johnson re working as team leader (.2); correspond with CMST review team (.1); correspond with D. Lambrinos re case (.2).
7/14/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	4.00	$475	1,900.00	Review complaint (1.5), review document review manual (1.5), meet with review team to get up to speed on the review (1.0).
8/1/2014	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	0.50	$475	237.50	Manage document review and confer with K. Kitchen re time limits and expectations for speed for the review.
8/4/2014	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	0.80	$475	380.00	Conference with CMST document review team to discuss changes in management of document review following B. Johnson's correspondence with Hagens Berman.
9/3/2014	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	0.50	$475	237.50	Call with K. Kitchen re management of document review (.2); meeting with B. Johnson re conference with K. Kitchen (.3).
9/26/2014	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	0.50	$475	237.50	Call with lead counsel regarding management of document review (.3); confer with B. Johnson re staffing of review (.2).
11/12/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	3.00	$475	1,425.00	Review Defendants[redacted] brief (1.3); review the Court's motion to dismiss order and certain motion to dismiss briefing (1.2); call with co-counsel regarding division of labor for [redacted] brief (.5).
11/24/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	8.00	$475	3,800.00	Call with Geoff Rushing regarding status of[redacted] brief (1.0); draft and edit materially advancing litigation section (6.0); review IPP sections and circulate to team (1.0).
11/11/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	0.30	$475	142.50	Correspond with K. Pierson regarding taking on[redacted] assignment (.2); email with S. Scarlett regarding next steps for[redacted] assignment (.1).
11/17/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	8.00	$475	3,800.00	Research standards for motions for interlocutory appeal (3.0); review cases from northern district of California and 9th circuit (3.0); review AGC standing precedent in 9th circuit and other circuits (2.0).
11/18/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	6.50	$475	3,087.50	Review caselaw on controlling question of law precedent (2.0); draft section of IPP[redacted] brief regarding controlling question of law (4.5).
11/21/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	8.30	$475	3,942.50	Research and review case law on substantial grounds for disagreement in[redacted] briefs (2.8); draft IPP section of[redacted] brief regarding controlling questions of law (5.0); correspond with G. Rushing regarding coordinating brief sections (.5).
11/28/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	0.80	$475	380.00	Review G. Rushings's DPP sections (.6); circulate comments (.2).
11/30/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	2.00	$475	950.00	Incorporate IPP sections into G. Rushing's draft brief (1.5); circulate briefs and comments regarding overall structure of the brief (.5).
12/1/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	0.30	$475	142.50	Review emails (.1); circulate redlined version of brief (.2).
12/1/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	0.30	$475	142.50	Correspond with drafting team regarding edits and changes (.2); send K. Pierson update regarding status of brief (.1).
12/3/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	5.80	$475	2,755.00	Edit interlocutory appeal brief to revise introduction (2.8); update controlling question of law section (1.7)); streamline the standards section (.8); call with co-counsel to discuss finalizing brief and outstanding issues (.5).
12/4/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	2.80	$475	1,330.00	Review edits and correspond with S. Scarlett regarding changes (1.0); draft statement of issues (1.5); review co-counsel's edits to the statement of issues (.3).
12/5/2014	415	Levens, Emmy	8	Drafting Pleadings, Briefs & Pretrial Motions	1.50	$475	712.50	Review edits to brief (.7); pull and switch Lexis and Westlaw cites (.8).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
4/20/2015	415	Levens, Emmy	3	Drafting Discovery Answers/Responses	2.50	$500	1,250.00	Review discovery requests for plaintiffs (1.8); review and respond to email correspondence with lead counsel re project (.7).
4/21/2015	415	Levens, Emmy	3	Drafting Discovery Answers/Responses	2.70	$500	1,350.00	Review discovery served on plaintiffs (.5); call with D. Lambrinos, J. Jasnoch, and B. Johnson to discuss strategy and go through responses one by one (2.0); discuss staffing and plan for compiling responses with B. Johnson (.2).
4/22/2015	415	Levens, Emmy	3	Drafting Discovery Answers/Responses	3.50	$500	1,750.00	Meet with J. Prince and A. Guiterrez regarding project for responding to plaintiffs discovery (1.8); create plan for assigning CMST's plaintiffs to the team (.9); email attorneys representing plaintiffs to start process of scheduling meet and confers (.5); confer with D. Lambrinos re missing information for plaintiffs and other issues (.3).
4/23/2015	415	Levens, Emmy	11	Litigation Strategy Analysis & Case Management	2.50	$500	1,250.00	Review and respond to email correspondence from attorneys regarding scheduling meet and confers (.6); confer with D. Lambrinos re plaintiff assignments and missing plaintiff information (.8); confer with B. Johnson re status of project (.5); confer with J. Prince and A. Guiterrez re status of project (.6).
6/20/2013	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Confer with J. Friedman re named plaintiffs (.2); confer with G. Farah, K. Pierson re same (.1).
7/1/2013	468	Johnson, Brent	8	Drafting Pleadings, Briefs & Pretrial Motions	0.50	$530	265.00	Confer with J. Friedman, K. Pierson, G. Farah and D. Young re consolidated amended complaint and signing protective order (.2); review complaint (.3).
7/2/2013	468	Johnson, Brent	8	Drafting Pleadings, Briefs & Pretrial Motions	0.50	$530	265.00	Review consolidated amended complaint (.3); confer with K. Pierson re same (.2).
2/25/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	1.00	$595	595.00	Confer with J. Verducci and reviewers re document review and training.
2/26/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.80	$595	476.00	Manage reviewers re initiating document review.
3/20/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Coordinate amended complaint document review.
5/20/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Manage reviewers re document review.
5/21/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Confer with J. Verducci and reviewers re document review.
7/2/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.80	$595	476.00	Confer with D. Lambrinos re Sanyo team lead position and managed related document review (.4); confer with K. Pierson, D. Small and E. Levens re same (.4).
7/31/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	1.50	$595	892.50	Confer with J. Friedman, K. Pierson and E. Levens re managing document review (1.0); manage review team re same (.5).
7/30/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	1.80	$595	1,071.00	Confer with J. Friedman, K. Pierson and E. Levens re managing document review.
8/1/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.80	$595	476.00	Confer with J. Friedman, K. Pierson and E. Levens re managing document review.
9/16/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.30	$595	178.50	Confer with R. Spiegel re managing document review.
9/2/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Manage document review.
9/24/2014	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	0.80	$595	476.00	Review plaintiff materials for B. Hanlon from G. Farah (.6); send same to lead counsel (.2).
9/26/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Confer with L. Chan and E. Levens re managing document review re-start process and timing.
9/29/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.30	$595	178.50	Confer with L. Garcia, L. Chan re managing document review restart (.2); confer with B. Bush, R. Spiegel re next assignments (.1).
10/28/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$595	297.50	Confer with D. Young and R. Spiegel re managing document review staffing.
11/3/2014	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.30	$595	178.50	Confer with D. Young re managing staffing of document review.
4/21/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	2.50	$620	1,550.00	Review interrogatories and requests for production to plaintiffs on extensive conference call (1.8); confer with counsel at Cotchett and E. Levens re same (.7).
4/22/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	0.80	$620	496.00	Confer with E. Levens re interrogatories and document collection project (.6); confer with J. Friedman re same (.2).
4/24/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	0.50	$620	310.00	Confer with D. Lambrinos and E. Levens re interrogatory project with [redacted]

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
4/27/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	1.50	$620	930.00	Confer with D. Young, J. Prince and A. Guiterrez re handling interrogatory responses and collecting documents from plaintiffs (.5); review all interrogatories and document checklist in preparation for call with plaintiffs (.8); review letter re products and other materials in connection with same (.2).
4/30/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	0.30	$620	186.00	Confer with D. Young re interrogatory process.
7/27/2015	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.50	$620	310.00	Confer with D. Young re managing document review.
8/31/2015	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.30	$620	186.00	Confer with S. Scarlett re managing document review.
8/27/2015	468	Johnson, Brent	11	Litigation Strategy Analysis & Case Management	0.30	$620	186.00	Confer with S. Scarlett re managing document review.
10/14/2015	468	Johnson, Brent	3	Drafting Discovery Answers/Responses	1.00	$620	620.00	[redacted] (.4); draft letter to same (.2) ; review backup for purchases (.4).
4/27/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	4.80	$530	2,544.00	Meet with B. Johnson, A. Gutierrez re plaintiff discovery responses (3.4); correspond with co-counsel re same (.6); telephone with K. Tawney and counsel re same (.8).
4/28/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.00	$530	1,060.00	[redacted] (.4); telephone with D. Lambrinos re interrogatory status (1.0); telephone with J. Prince re same (.6).
4/29/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.50	$530	1,325.00	[redacted] (2.0); [redacted] (.5). [redacted] (.6); correspond with co-counsel re interrogatory
4/30/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.80	$530	1,484.00	responses (.3); review grid of collected interrogatory information (1.9).
5/1/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	3.00	$530	1,590.00	Meet with A. Gutierrez re interrogatory responses (1.8); telephone with J. Prince re same (.6); teleconference with Tom Pham re same (.6).
5/4/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.50	$530	795.00	Review [redacted] responses (.8); meet with A. Gutierrez re same (.7).
5/5/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.30	$530	1,219.00	Teleconference with [redacted] (.4); review draft interrogatory responses (1.5); correspond with co-counsel re same (.4).
5/6/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$530	265.00	Correspond with J. Prince, A. Gutierrez re interrogatory responses (.3); correspond with D. Lambrinos re same (.2).
5/7/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.80	$530	1,484.00	Review plaintiff interrogatory responses (2.4); correspond with co-counsel re same (.4).
5/9/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	2.50	$530	1,325.00	Revise plaintiff interrogatory responses (2.3); correspond with co-counsel re same (.2).
5/10/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.80	$530	954.00	Review plaintiff interrogatory responses (1.6); correspond with co-counsel re same (.2).
5/11/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	5.00	$530	2,650.00	Revise plaintiff interrogatory responses (4.7); correspond with co-counsel re same (.3).
5/12/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.00	$530	530.00	Correspond with co-counsel re plaintiff interrogatory responses.
5/14/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Correspond with co-counsel re plaintiff interrogatory responses.
5/20/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Correspond with D. Lambrinos re interrogatory responses.
5/28/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Meet with team re plaintiff interrogatory follow up.
6/8/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Review rog responses re additional materials needed from plaintiffs (.2); correspond with A. Gutierrez and J. Prince re same (.1).
6/10/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Correspond with co-counsel re additional photos received from plaintiffs.
6/17/2015	489	Young, David, A.	11	Litigation Strategy Analysis & Case Management	0.30	$530	159.00	Correspond with J. Sung re document review.
9/9/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Telephone with J. Prince re [redacted] documents and deposition dates (.2); correspond with co-counsel re same (.1).
9/11/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Telephone with J. Prince re [redacted]
9/14/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.00	$530	530.00	Telephone with co-lead counsel re additional RFPs (.6); telephone with J. Prince, A. Gutierrez re same (.4).
9/16/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$530	265.00	Meet with A. Gutierrez re class rep discovery.
9/17/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$530	265.00	Teleconference with co-counsel re plaintiff discovery.
9/18/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.80	$530	424.00	Telephone with [redacted] re discovery responses (.5); correspond with A. Gutierrez re same (.3).
9/21/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.80	$530	424.00	Telephone with J. Abetti re client search (.3); meet with A. Gutierrez re RFP responses (.5).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
9/29/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.00	$530	530.00	Meet with team re plaintiff discovery responses (.8); correspond with co-counsel re same (.2).
9/30/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.80	$530	424.00	Meet and confer call re plaintiff discovery responses (.6); correspond with coleads re same (.2).
11/2/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$530	265.00	Correspond with team re additional interrogatory verifications (.3); correspond with D. Lambrinos re same (.1); correspond with D. Grossman re additiona[redacted] device (.1).
11/24/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Meet with A. Gutierrez re plaintiff follow up.
11/30/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$530	265.00	Correspond with co-counsel re depositions (.2); review plaintiff material re same (.3).
12/10/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Correspond with co-counsel re plaintiff depositions.
12/17/2015	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$530	159.00	Correspond with co-counsel re interrogatory verifications.
1/7/2016	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$560	168.00	Correspond with co-counsel re interrogatory verifications.
1/20/2016	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.50	$560	280.00	Meet with D. Lambrinos re defendants' motion to compel (.3); review response re same (.1); correspond with co-counsel re same (.1).
3/10/2016	489	Young, David, A.	3	Drafting Discovery Answers/Responses	0.30	$560	168.00	Correspond with co-counsel re plaintiff interrogatories.
3/11/2016	489	Young, David, A.	3	Drafting Discovery Answers/Responses	1.00	$560	560.00	Telephone and correspond with co-counsel re RFP verifications (.5); coordinate same with J. Prince and A. Gutierrez (.5).
5/2/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	1.30	$605	786.50	Correspondence regarding drafting MTD opposition (.8); review relevant pleadings and correspondence with counsel re same (.5).
5/4/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	1.00	$605	605.00	Yusua MTD opposition work.
5/5/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	9.00	$605	5,445.00	Yusua MTD opposition (6.5); research and review CAC (.8), orders and briefs (.7); analyze issues (1.0).
5/9/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	0.50	$605	302.50	correspondence with counsel regarding Yuasa MTD questions.
5/12/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	1.00	$605	605.00	Yuasa MTD opposition.
5/13/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	5.30	$605	3,206.50	GS Yusua MTD opposition (4.4); research and correspondence with counsel re same (.9).
5/15/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	8.00	$605	4,840.00	GS Yuasa NTD opposition (5.0); research and drafting (3.0).
5/16/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	7.00	$605	4,235.00	GS Yuasa MTD opposition (4.0); research and drafting (3.0).
5/17/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	1.50	$605	907.50	GS Yuasa MTD Opposition (.7); research and draft (.8).
5/18/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	8.30	$605	5,021.50	GS Yuasa MTD Opposition (4.3); research and draft (4.0).
5/19/2014	540	Cormier, Christopher, J.	8	Drafting Pleadings, Briefs & Pretrial Motions	2.30	$605	1,391.50	Revise/finalize/send GS Yuasa MTD Opposition to lead counse (2.1); correspondence re same (.2).
4/22/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.80	$350	980.00	Responses to Defendants' requests (1.5); coordinate name plaintiff responses with counsel (1.3).
4/23/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Draft plaintiffs' discovery responses.
4/24/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.50	$350	525.00	Draft plaintiffs' discovery responses.
4/27/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Draft plaintiffs' discovery responses.
4/28/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	3.00	$350	1,050.00	Draft plaintiffs' discovery responses.
4/29/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.50	$350	525.00	Draft plaintiffs' discovery responses.
4/30/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	3.80	$350	1,330.00	Draft plaintiffs' discovery responses.
5/1/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Coordinate plaintiff discovery responses (.8); interview plaintiff and draft interrogatory responses (1.5).
5/4/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	4.30	$350	1,505.00	Telephone calls with plaintiffs and counsel re: interrogatory responses (1.6); draft responses for each (2.7).
5/5/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	3.50	$350	1,225.00	Draft interrogatory responses for plaintiffs.
5/6/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.80	$350	980.00	Telephone interview with plaintiff and counsel re: interrogatories (1.3); draft responses (1.5).
5/8/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Draft plaintiff interrogatory responses.
5/11/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.00	$350	700.00	Draft plaintiff interrogatory responses.
5/28/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Coordinate production of plaintiffs' documents.
5/29/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Coordinate production of plaintiffs' documents.
6/4/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Follow up with counsel re: document productions.
6/5/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Follow up with counsel re: document productions.

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6/8/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Follow up with counsel re: documents from clients responsive to requests for production.
6/9/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.30	$350	455.00	Collect and organize client documents responsive to requests for production.
6/10/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Collect and organize client documents responsive to requests for production.
9/10/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Verify completeness of document production from proposed class reps and request availability for deposition.
9/10/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Coordinate class rep responses to defendants' discovery requests.
9/11/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Coordination of class reps' responses to defendants' discovery requests (.3); contact class rep re: availability for deposition (.2).
9/12/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.30	$350	105.00	Coordination of class rep responses to Toshiba requests for production.
9/14/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Class rep responses to Toshiba requests for production.
9/15/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.80	$350	630.00	Contact class representatives re: Toshiba requests for production.
9/17/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.50	$350	525.00	Contact class representatives re Toshiba requests for production.
9/18/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.00	$350	700.00	Class representative responses to Toshiba requests for production.
9/24/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Class representatives' responses to Toshiba requests for production.
9/25/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Class representative responses to Toshiba requests for production.
9/28/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.30	$350	455.00	Class representatives' responses to Toshiba requests for production.
9/29/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Class representatives' responses to Toshiba requests for production.
9/30/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Class representatives' responses to Toshiba requests for production.
10/6/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Coordinate class representative responses to RFPs from defendant Toshiba.
10/9/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Coordinate class representative responses to defendant Toshiba's RFPs.
11/10/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	[redacted] discovery responses.
11/25/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Supplemental interrogatory response for potential class representative based on additional purchase.
11/30/2015	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.30	$350	105.00	T/c with referring counsel re: class representative deposition.
1/5/2016	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	0.80	$375	300.00	Coordinate class member discovery responses (.6); contact counsel for verifications of discovery responses (.2).
3/11/2016	669	Prince, Joshua	3	Drafting Discovery Answers/Responses	1.30	$375	487.50	Request verifications of discovery responses from named plaintiffs.
6/2/2014	692	Gentile, Meghan	7	Document Review	7.00	$345	2,415.00	Review background batteries materials, coding manual, MTD opinion, amended complaint.
6/3/2014	692	Gentile, Meghan	7	Document Review	7.50	$345	2,587.50	Review background batteries materials, coding manual, MTD opinion, amended complaint.
6/4/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Review background batteries materials, coding manual, MTD opinion, amended complaint.
6/4/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Explored Catalyst using doc review manual as a guideline.
6/4/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Continued reading review manual and comparing to amended complaint.
6/4/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Batteries conference call re doc review training.
6/4/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Received first batch of docs and used docs to explore catalyst and coding form.
6/4/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Talked to Brenna Bush about Sanyo review and Catalyst questions.
6/4/2014	692	Gentile, Meghan	7	Document Review	0.70	$345	241.50	Comparing coding manual to call notes (.4), scanning Sanyo docs (.2), reading up re important Sanyo characters (.1).
6/5/2014	692	Gentile, Meghan	7	Document Review	8.00	$345	2,760.00	Reviewed new batch of docs and kept corresponding coding log (Sanyo custodians).
6/6/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Began reviewing new batch of docs. (Sanyo custodians).
6/6/2014	692	Gentile, Meghan	7	Document Review	6.00	$345	2,070.00	Reviewed new batches of docs and kept corresponding coding log (Sanyo custodians).
6/9/2014	692	Gentile, Meghan	7	Document Review	8.50	$345	2,932.50	Reviewed new batches of docs and kept corresponding coding log (Sanyo custodians).
6/10/2014	692	Gentile, Meghan	7	Document Review	2.30	$345	793.50	Continued reviewing docs and updating log (Sanyo custodians).
6/10/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Talked to Brenna Bush about pace of review, how to get more documents, releasing documents, and whether we can perform searches.
6/10/2014	692	Gentile, Meghan	7	Document Review	6.80	$345	2,346.00	Continued reviewing docs in Catalyst and keeping corresponding coding log (Sanyo custodians).
6/11/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Continued reviewing docs and updating log (Sanyo custodians).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
6/11/2014	692	Gentile, Meghan	7	Document Review	6.30	$345	2,173.50	Continued reviewing docs in Catalyst and keeping corresponding coding log (Sanyo custodians).
6/12/2014	692	Gentile, Meghan	7	Document Review	2.00	$345	690.00	Continued reviewing docs in Catalys and keeping corresponding coding log (Sanyo custodians).
6/12/2014	692	Gentile, Meghan	7	Document Review	0.50	$345	172.50	Read and responded to email from Catalyst about reviewer notes problem (.2), emailed Ronnie Spiegel re same (.1), phone call with Ronnie Spiegel re same (.2).
6/12/2014	692	Gentile, Meghan	7	Document Review	1.80	$345	621.00	Began searching for and adding reviewer notes to documents with missing reviewer notes fields.
6/12/2014	692	Gentile, Meghan	7	Document Review	3.30	$345	1,138.50	Emailed Ronnie Spiegel re completing project to add reviewer notes to documents with missing reviewer notes fields (.3), continued reviewing docs in Catalyst and keeping corresponding coding log (3.0).
6/13/2014	692	Gentile, Meghan	7	Document Review	7.80	$345	2,691.00	Review and code Defendants' documents, (Sanyo custodians) (7.0); update review log (.8).
6/16/2014	692	Gentile, Meghan	7	Document Review	5.50	$345	1,897.50	Review and code Defendants' documents, (Sanyo custodians) (5.0); update review log (.5).
6/17/2014	692	Gentile, Meghan	7	Document Review	8.30	$345	2,863.50	Review and code Defendants' documents, (Sanyo custodians) (.2); update review log (8.1).
6/18/2014	692	Gentile, Meghan	7	Document Review	8.80	$345	3,036.00	Review and code Defendants' documents (Sanyo custodians) (8.3); update review log (.5).
6/19/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Review and code Defendants' documents (Sanyo custodians) (.2); update review log (.1).
6/19/2014	692	Gentile, Meghan	7	Document Review	5.80	$345	2,001.00	Continued reviewing docs in Catalyst keeping corresponding coding log.
6/20/2014	692	Gentile, Meghan	7	Document Review	2.30	$345	793.50	Continued reviewing docs and updating log (Sony custodians).
6/20/2014	692	Gentile, Meghan	7	Document Review	7.50	$345	2,587.50	Continued reviewing docs in Catalyst keeping corresponding coding log (Sony custodians).
6/23/2014	692	Gentile, Meghan	7	Document Review	5.30	$345	1,828.50	Continued reviewing docs and updating log (Sony custodians).
6/23/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
6/24/2014	692	Gentile, Meghan	7	Document Review	3.00	$345	1,035.00	Continued reviewing docs and updating log (Sony custodians).
6/24/2014	692	Gentile, Meghan	7	Document Review	6.00	$345	2,070.00	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
6/25/2014	692	Gentile, Meghan	7	Document Review	8.00	$345	2,760.00	Continued reviewing docs and updating log (Sony custodians).
6/26/2014	692	Gentile, Meghan	7	Document Review	2.00	$345	690.00	Continued reviewing docs and updating log (Sony custodians).
6/26/2014	692	Gentile, Meghan	7	Document Review	7.50	$345	2,587.50	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
6/27/2014	692	Gentile, Meghan	7	Document Review	3.80	$345	1,311.00	Continued reviewing docs and updating log (Sony custodians).
6/30/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued reviewing docs and updating log (Sony custodians).
6/30/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
7/1/2014	692	Gentile, Meghan	7	Document Review	4.30	$345	1,483.50	Continued reviewing docs and updating log (Sony custodians).
7/1/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Reviewed notes from doc review in preparation for today's call.
7/1/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Conference call with reviewers: discussed state of review, issues, questions from reviewers, etc.
7/1/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
7/1/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
7/1/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Continued reviewing docs in Catalyst, keeping corresponding coding log (Sony custodians).
7/2/2014	692	Gentile, Meghan	7	Document Review	3.80	$345	1,311.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/2/2014	692	Gentile, Meghan	7	Document Review	5.30	$345	1,828.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
7/7/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/7/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/8/2014	692	Gentile, Meghan	7	Document Review	5.00	$345	1,725.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/8/2014	692	Gentile, Meghan	7	Document Review	3.50	$345	1,207.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/9/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/9/2014	692	Gentile, Meghan	7	Document Review	5.50	$345	1,897.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/10/2014	692	Gentile, Meghan	7	Document Review	4.30	$345	1,483.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/10/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/11/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/11/2014	692	Gentile, Meghan	7	Document Review	3.50	$345	1,207.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/14/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/14/2014	692	Gentile, Meghan	7	Document Review	6.50	$345	2,242.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/15/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/15/2014	692	Gentile, Meghan	7	Document Review	5.80	$345	2,001.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/15/2014	692	Gentile, Meghan	7	Document Review	1.80	$345	621.00	Met with Emmy Levens re state of review, Sanyo as a defendant, status of the case and next steps.
7/16/2014	692	Gentile, Meghan	7	Document Review	2.30	$345	793.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/16/2014	692	Gentile, Meghan	7	Document Review	4.80	$345	1,656.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/17/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/17/2014	692	Gentile, Meghan	7	Document Review	2.00	$345	690.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/17/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/18/2014	692	Gentile, Meghan	7	Document Review	3.00	$345	1,035.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/18/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/18/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Searched Catalyst for hot docs (.5), wrote hot docs memo and emailed to group (.3).
7/18/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Searched hot docs to answer Emmy Levens's emailed question re hot docs rated by CMST team.
7/21/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/21/2014	692	Gentile, Meghan	7	Document Review	5.50	$345	1,897.50	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/22/2014	692	Gentile, Meghan	7	Document Review	6.00	$345	2,070.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
7/23/2014	692	Gentile, Meghan	7	Document Review	9.50	$345	3,277.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/24/2014	692	Gentile, Meghan	7	Document Review	2.80	$345	966.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/24/2014	692	Gentile, Meghan	7	Document Review	3.80	$345	1,311.00	Continued reviewing docs in Catalyst, keeping corresponding coding log, T. Matsumoto (Sanyo) custodial files.
7/25/2014	692	Gentile, Meghan	7	Document Review	7.00	$345	2,415.00	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
7/28/2014	692	Gentile, Meghan	7	Document Review	4.30	$345	1,483.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
8/1/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued reviewing docs and updating log, T. Matsumoto (Sanyo) custodial files.
8/4/2014	692	Gentile, Meghan	7	Document Review	2.80	$345	966.00	Continued reviewing docs, [redacted] (2.5), and updating log (.3).
8/4/2014	692	Gentile, Meghan	7	Document Review	1.80	$345	621.00	Continued coding documents, [redacted], and keeping corresponding log re same.
8/4/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued coding documents, [redacted], and keeping corresponding log re same.
8/4/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued coding documents [redacted], and keeping corresponding log re same.
8/4/2014	692	Gentile, Meghan	7	Document Review	2.80	$345	966.00	Continued coding documents, [redacted], and keeping corresponding log re same.
8/5/2014	692	Gentile, Meghan	7	Document Review	3.00	$345	1,035.00	Continued reviewing docs, [redacted] and price quotes, and updating log.
8/5/2014	692	Gentile, Meghan	7	Document Review	4.80	$345	1,656.00	Continued coding documents about [redacted] and keeping corresponding log re same.
8/6/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Continued coding documents re cell testing and purchase orders and keeping corresponding log re same.
8/6/2014	692	Gentile, Meghan	7	Document Review	6.00	$345	2,070.00	Continued coding documents re purchase orders and keeping corresponding log.
8/7/2014	692	Gentile, Meghan	7	Document Review	1.30	$345	448.50	Logged into Catalyst and continued coding documents re cell testing and purchase orders and keeping corresponding log re same.
8/7/2014	692	Gentile, Meghan	7	Document Review	4.30	$345	1,483.50	Continued coding S Kitano and T Matsumoto custodial documents and keeping corresponding log re same.
8/7/2014	692	Gentile, Meghan	7	Document Review	2.00	$345	690.00	Continued reviewing T Matsumoto and A Pourfallah custodial docs and keeping corresponding log re same.
8/8/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Continued reviewing A Pourfallah custodial documents re upcoming supplier meetings and keeping corresponding log.
8/12/2014	692	Gentile, Meghan	7	Document Review	2.30	$345	793.50	Continued reviewing A Pourfallah custodial documents re upcoming supplier meetings and keeping corresponding log.
8/12/2014	692	Gentile, Meghan	7	Document Review	6.80	$345	2,346.00	Continued coding documents, A. Pourfallah, custodial documents.
8/13/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued coding documents, monthly calendar appoints, A. Pourfallah custodial documents.
8/13/2014	692	Gentile, Meghan	7	Document Review	4.50	$345	1,552.50	Continued coding documents, mostly calendar appointments.
8/13/2014	692	Gentile, Meghan	7	Document Review	0.50	$345	172.50	Continued coding documents, mostly calendar appointments.
8/13/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Continued coding documents, mostly calendar appointments.
8/13/2014	692	Gentile, Meghan	7	Document Review	3.80	$345	1,311.00	Continued coding documents, mostly calendar appointments.
8/14/2014	692	Gentile, Meghan	7	Document Review	5.30	$345	1,828.50	Continued coding documents, mostly calendar appointments
8/14/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Reviewed documents log and recent emails in preparation for conference call.
8/14/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Review team conference call.
8/14/2014	692	Gentile, Meghan	7	Document Review	0.80	$345	276.00	Reviewed notes from conference call (.2), wrote Brent Johnson and Emmy Levens a summary of our meeting (.6).
8/14/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Continued reviewing batteries docs containing emails with customers re battery sales and keeping corresponding log.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
8/14/2014	692	Gentile, Meghan	7	Document Review	1.80	$345	621.00	Continued reviewing batteries docs containing emails with customers re battery sales and keeping corresponding log.
8/15/2014	692	Gentile, Meghan	7	Document Review	2.80	$345	966.00	Continued reviewing batteries docs containing emails with customers re battery sales and keeping corresponding log.
8/15/2014	692	Gentile, Meghan	7	Document Review	6.50	$345	2,242.50	Continued reviewing batteries docs containing emails with customers re battery sales and keeping corresponding log.
8/16/2014	692	Gentile, Meghan	7	Document Review	1.00	$345	345.00	Reviewed document review log in preparation to "top 20" list due soon.
8/18/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Reviewed doc review log (.1), created new hot docs chart (.1), emailed to Jaclyn Verducci (.1).
8/18/2014	692	Gentile, Meghan	7	Document Review	8.30	$345	2,863.50	Continued reviewing documents and contact forms all of which require partial translation and keeping corresponding log.
8/19/2014	692	Gentile, Meghan	7	Document Review	4.80	$345	1,656.00	Continued reviewing documents, contact forms all of which require partial translation, and keeping corresponding log.
8/19/2014	692	Gentile, Meghan	7	Document Review	2.50	$345	862.50	Continued reviewing docs., T. Matsumoto contacts.
8/19/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/20/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/20/2014	692	Gentile, Meghan	7	Document Review	1.50	$345	517.50	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/20/2014	692	Gentile, Meghan	7	Document Review	4.00	$345	1,380.00	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/21/2014	692	Gentile, Meghan	7	Document Review	7.00	$345	2,415.00	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/21/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Read email from Catalyst (.1); reviewed past emails re same (.1); forwarded to Emmy Levens and Brent Johnson with details (.1).
8/22/2014	692	Gentile, Meghan	7	Document Review	4.30	$345	1,483.50	Continued reviewing docs, most of which are T Matsumoto's contacts, and keeping corresponding log.
8/22/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Talked to Brenna Bush re today's top 20 list, pace of review, problem with pre-coded documents in batch.
8/22/2014	692	Gentile, Meghan	7	Document Review	1.30	$345	448.50	Prepared top 20 list, edited, sent to Jaclyn Verducci.
8/25/2014	692	Gentile, Meghan	7	Document Review	8.50	$345	2,932.50	Continued reviewing docs, most of which are T Matsumoto's contacts.
8/26/2014	692	Gentile, Meghan	7	Document Review	1.30	$345	448.50	Continued reviewing docs, most of which are T Matsumoto's contacts.
8/26/2014	692	Gentile, Meghan	7	Document Review	0.30	$345	103.50	Completed final batteries batch.
10/28/2014	692	Gentile, Meghan	7	Document Review	0.50	$345	172.50	Talked to Emmy Levens and David Young about transitioning back to batteries, timing, etc.(.2), searched for batteries materials (.3).
2/26/2014	706	Bush, Brenna	7	Document Review	2.80	$310	868.00	Batteries training call and discussed case with contract attorney (Collier).
2/27/2014	706	Bush, Brenna	7	Document Review	1.80	$310	558.00	Discuss case with contract attorney (Kitchen) and answer her questions and participated in English reviewer call.
2/28/2014	706	Bush, Brenna	7	Document Review	1.00	$310	310.00	Discussed case with contract attorney (Kitchen) and answered her questions.
3/4/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Read Batteries coding guide: first consolidated amended complaint, MTD order and issue outline.
3/5/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review for Amended Complaint project -- Sanyo English Batch #2.
3/6/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review for Amended Complaint project -- Sanyo English Batch #2.
3/10/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Conducted document review for Amended Complaint project -- Batch #2.
3/11/2014	706	Bush, Brenna	8	Drafting Pleadings, Briefs & Pretrial Motions	0.80	$310	248.00	Received Batteries 1 pages assigned from Brent Johnson (Partner) and began project.
3/12/2014	706	Bush, Brenna	8	Drafting Pleadings, Briefs & Pretrial Motions	3.50	$310	1,085.00	Finished drafting one page Batteries summary for Brent Johnson (partner).
3/13/2014	706	Bush, Brenna	7	Document Review	7.00	$310	2,170.00	Conducted document review for Amended Complaint project - Sanyo English Batch #2.
3/14/2014	706	Bush, Brenna	7	Document Review	6.30	$310	1,953.00	Conducted document review for Amended Complaint project -- Sanyo English Batch #2.
3/18/2014	706	Bush, Brenna	7	Document Review	6.00	$310	1,860.00	Conducted document review for Amended Complaint project -- Batch #2.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
3/19/2014	706	Bush, Brenna	7	Document Review	6.30	$310	1,953.00	Conducted document review for Amended Complaint project -- Sanyo English Batch #2 and Sony Batch #11.
3/20/2014	706	Bush, Brenna	7	Document Review	7.50	$310	2,325.00	Conducted document review for Amended Complaint project -- Sony Batch #11.
3/21/2014	706	Bush, Brenna	7	Document Review	8.50	$310	2,635.00	Conducted document review for Amended Complaint project -- Sony Batch #11.
3/25/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review for Amended Complaint project -- Sony Batch #11.
3/26/2014	706	Bush, Brenna	7	Document Review	4.50	$310	1,395.00	Conducted document review for Amended Complaint project -- Sony Batch #11 until received email to stop coding.
5/29/2014	706	Bush, Brenna	7	Document Review	0.50	$310	155.00	Emails to Jaclyn Verducci regarding restart of Batteries at CMST.
5/30/2014	706	Bush, Brenna	7	Document Review	4.00	$310	1,240.00	Begin reading coding guide manual (3.5), and email CMST coding team to make sure they received the coding guide, credentials and can attend training session (.5).
6/3/2014	706	Bush, Brenna	7	Document Review	7.00	$310	2,170.00	Read new coding guide documents and assembled binder.
6/4/2014	706	Bush, Brenna	7	Document Review	6.00	$310	1,860.00	Continue reading new batteries coding guide and documents.
6/6/2014	706	Bush, Brenna	7	Document Review	0.30	$310	93.00	Continue reading new coding guide.
6/9/2014	706	Bush, Brenna	7	Document Review	0.50	$310	155.00	Set up document review platform from the old viewer to the new viewer.
6/10/2014	706	Bush, Brenna	7	Document Review	6.80	$310	2,108.00	Emailed with Japanese contract reviewer (Kitchen) and answered her questions regarding business documents and California contacts and conducted document review.
6/17/2014	706	Bush, Brenna	7	Document Review	3.80	$310	1,178.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo
6/18/2014	706	Bush, Brenna	7	Document Review	3.30	$310	1,023.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/19/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/23/2014	706	Bush, Brenna	7	Document Review	6.50	$310	2,015.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/25/2014	706	Bush, Brenna	7	Document Review	0.80	$310	248.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/26/2014	706	Bush, Brenna	7	Document Review	5.00	$310	1,550.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/27/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
6/30/2014	706	Bush, Brenna	7	Document Review	2.50	$310	775.00	Review and code Defendants' documents, Sanyo custodian Joe DeCarlo.
7/1/2014	706	Bush, Brenna	7	Document Review	1.00	$310	310.00	Batteries group conference call.
7/3/2014	706	Bush, Brenna	7	Document Review	4.50	$310	1,395.00	Conducted batteries document review (Defendant Sanyo) (4.0) and emailed Emmy Levens (Associate) documents from the case to help her get up to speed (.5) custodians T. Matsumoto and A. Pourfallah.
7/7/2014	706	Bush, Brenna	7	Document Review	8.50	$310	2,635.00	Conducted document review for Defendant Sanyo custodians, T. Matsumoto and A. Pourfallah.
7/9/2014	706	Bush, Brenna	7	Document Review	3.30	$310	1,023.00	Conducted document review for Defendant Sanyo custodians, T. Matsumoto and A. Pourfallah.
7/11/2014	706	Bush, Brenna	7	Document Review	7.30	$310	2,263.00	Conducted document review for Defendant Sanyo custodians, T. Matsumoto and A. Pourfallah.
7/15/2014	706	Bush, Brenna	7	Document Review	4.50	$310	1,395.00	Conducted document review for Defendant Sany, custodians T. Matsumoto and A. Pourfallah.
7/16/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and A. Pourfallah.
7/17/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/18/2014	706	Bush, Brenna	7	Document Review	8.80	$310	2,728.00	Conducted document review (for Defendant Sanyo) (8.3) and responded to Emmy Levens's emails regarding the hot doc memos (.5), custodians T. Matsumoto and K. Kobayashi.
7/21/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/22/2014	706	Bush, Brenna	7	Document Review	9.30	$310	2,883.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/23/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
7/24/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/25/2014	706	Bush, Brenna	7	Document Review	6.50	$310	2,015.00	Conducted document review (for Defendant Sanyo) (4.5) and drafted and submitted batch memo and hot docs memo (2.0), custodians T. Matsumoto and K. Kobayashi.
7/28/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/29/2014	706	Bush, Brenna	7	Document Review	7.00	$310	2,170.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/30/2014	706	Bush, Brenna	7	Document Review	7.50	$310	2,325.00	Conducted document review for Defendant Sanyo, custodians T. Matsumoto and K. Kobayashi.
7/31/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Conducted document review (for Defendant Sanyo) (7.0) and had meeting with partner, Brent Johnson, and associate, Emmy Levens, and CMST tem members (Meghan Gentile and Alicia Gutierrez) regarding changes to coding, as received from co-counsel (1.0),custodians T. Matsumoto and K. Kobayashi.
8/1/2014	706	Bush, Brenna	7	Document Review	8.50	$310	2,635.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/4/2014	706	Bush, Brenna	7	Document Review	7.00	$310	2,170.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/5/2014	706	Bush, Brenna	7	Document Review	8.50	$310	2,635.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/6/2014	706	Bush, Brenna	7	Document Review	5.50	$310	1,705.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/7/2014	706	Bush, Brenna	7	Document Review	8.80	$310	2,728.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/8/2014	706	Bush, Brenna	7	Document Review	6.00	$310	1,860.00	Conducted document review of Defendant Sanyo, custodian K. Kobayashi.
8/11/2014	706	Bush, Brenna	7	Document Review	6.30	$310	1,953.00	Conducted document review of Defendant custodian, Sony, business cards, calendar entries, meeting agendas.
8/12/2014	706	Bush, Brenna	7	Document Review	9.50	$310	2,945.00	Conducted document review of [redacted]
8/13/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review of [redacted]
8/14/2014	706	Bush, Brenna	7	Document Review	0.80	$310	248.00	Batteries conference call with review team.
8/18/2014	706	Bush, Brenna	7	Document Review	6.50	$310	2,015.00	Conducted document review of [redacted]
8/19/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review of [redacted]
8/20/2014	706	Bush, Brenna	7	Document Review	9.50	$310	2,945.00	Conducted document review of [redacted]
8/21/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review of [redacted]
8/22/2014	706	Bush, Brenna	7	Document Review	6.00	$310	1,860.00	Conducted document review of Defendant custodian, [redacted] (5.0), [redacted] (1.0).
8/25/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review of Defendant custodian, [redacted]
8/26/2014	706	Bush, Brenna	7	Document Review	1.50	$310	465.00	Conducted document review of Defendant custodian, [redacted]
9/29/2014	706	Bush, Brenna	7	Document Review	0.30	$310	93.00	Emails with Emmy Levens (Associate) re restart of Batteries document review and upcoming conference call.
10/9/2014	706	Bush, Brenna	7	Document Review	7.00	$310	2,170.00	Read coding guide, conference call notes and eight (8) Batteries emails since 9/29 (4.0). Met with Emmy Levens (Associate) before restarting (1.0), and began coding (review restart #3) (2.0).
10/10/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Batteries re-coding, submitted recoding memo and submitted to Karen Jones.
10/13/2014	706	Bush, Brenna	7	Document Review	7.30	$310	2,263.00	Batteries coding. Sony batch, custodian Tomoya "Tomo" Hayakawa.
10/14/2014	706	Bush, Brenna	7	Document Review	6.50	$310	2,015.00	Batteries coding. Sony batch, custodian Tomoya "Tomo" Hayakawa.
10/15/2014	706	Bush, Brenna	7	Document Review	9.50	$310	2,945.00	Batteries document review (coding). Sony batch, custodian Alan Sund.
10/16/2014	706	Bush, Brenna	7	Document Review	3.30	$310	1,023.00	Conducted document review, Sony batch, custodian Alan Sund.
10/17/2014	706	Bush, Brenna	7	Document Review	8.00	$310	2,480.00	Conducted document review (Sony custodian A. Sund).
10/20/2014	706	Bush, Brenna	7	Document Review	7.50	$310	2,325.00	Conducted document review (Sony custodians A. Sund and Jisette Tran).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
10/22/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review (Sony custodian Jisette Tran).
10/23/2014	706	Bush, Brenna	7	Document Review	5.50	$310	1,705.00	Conducted document review (Sony custodian Jisette Tran).
10/27/2014	706	Bush, Brenna	7	Document Review	8.30	$310	2,573.00	Conducted document review (Sony custodians S. Jaska and R. McCaul).
10/28/2014	706	Bush, Brenna	7	Document Review	9.00	$310	2,790.00	Conducted document review (Sony custodian R. McCaul) (8.0), participated in weekly conference call (.5), and emailed Associates (David Young and Emmy Levens) re Batteries case (.5).
11/3/2014	706	Bush, Brenna	7	Document Review	0.30	$310	93.00	Responded to David Young's emails and provided weekly conference call recap and possible next call.
3/10/2014	706	Bush, Brenna	7	Document Review	1.00	$310	310.00	Participated in the English reviewer conference call.
6/3/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Reviewed background materials, including complaint and Document Review Manual in preparation for document review.
6/16/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Review and code Sanyo documents in Catalyst.
6/17/2014	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	Review and code Sanyo documents in Catalyst.
6/18/2014	771	Gutierrez, Alicia	7	Document Review	8.00	$350	2,800.00	Review and code Sanyo documents in Catalyst.
6/19/2014	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	Review and code Sanyo documents in Catalyst.
6/10/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Review and code Sanyo documents in Catalyst.
6/20/2014	771	Gutierrez, Alicia	7	Document Review	7.30	$350	2,555.00	Review and code Sanyo documents in Catalyst.
6/23/2014	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	Review and code Sanyo documents in Catalyst.
6/25/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Teleconference for document review training.
7/1/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sanyo documents (5.5); team conference call regarding document review to date (.5).
6/30/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Review and code Sanyo documents in Catalyst.
6/4/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Review and code Sanyo documents in Catalyst.
6/5/2014	771	Gutierrez, Alicia	7	Document Review	7.30	$350	2,555.00	Review and code Sanyo documents in Catalyst.
6/6/2014	771	Gutierrez, Alicia	7	Document Review	7.50	$350	2,625.00	Review and code Sanyo documents in Catalyst.
7/7/2014	771	Gutierrez, Alicia	7	Document Review	3.00	$350	1,050.00	Reviewed Sanyo documents.
7/8/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
7/9/2014	771	Gutierrez, Alicia	7	Document Review	4.50	$350	1,575.00	Review and code Sanyo documents in Catalyst.
6/9/2014	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	Review and code Sanyo documents in Catalyst.
6/24/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Review and code Sanyo documents in Catalyst.
6/26/2014	771	Gutierrez, Alicia	7	Document Review	7.50	$350	2,625.00	Review and code Sanyo documents in Catalyst.
6/11/2014	771	Gutierrez, Alicia	7	Document Review	5.50	$350	1,925.00	Review and code Sanyo documents in Catalyst.
6/12/2014	771	Gutierrez, Alicia	7	Document Review	6.50	$350	2,275.00	Review and code Sanyo documents in Catalyst.
6/27/2014	771	Gutierrez, Alicia	7	Document Review	7.30	$350	2,555.00	Review and code Sanyo documents in Catalyst.
7/10/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
7/11/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Review and code Sanyo documents in Catalyst.
7/14/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
7/15/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
7/16/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Review and code Sanyo documents in Catalyst.
7/17/2014	771	Gutierrez, Alicia	7	Document Review	4.80	$350	1,680.00	Review and code Sanyo documents in Catalyst.
7/18/2014	771	Gutierrez, Alicia	7	Document Review	4.50	$350	1,575.00	Review and code Sanyo documents in Catalyst.
7/21/2014	771	Gutierrez, Alicia	7	Document Review	4.30	$350	1,505.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/22/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/23/2014	771	Gutierrez, Alicia	7	Document Review	5.30	$350	1,855.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/24/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/25/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/30/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Review and code Sanyo documents in Catalyst from custodian A. Pourfallah.
7/29/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
7/28/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Review and code Sanyo documents in Catalyst.
8/1/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sanyo documents from custodian A Pourfallah.
8/2/2014	771	Gutierrez, Alicia	7	Document Review	2.00	$350	700.00	Reviewed Sanyo documents from custodian A Pourfallah.
8/3/2014	771	Gutierrez, Alicia	7	Document Review	5.50	$350	1,925.00	Reviewed Sanyo documents from custodian A Pourfallah.
7/31/2014	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Reviewed Sanyo documents from custodian A Pourfallah (3.5).
8/4/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sanyo documents from custodian A Pourfallah (5.5); meeting with E Levens and other document reviewers (.5).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
8/5/2014	771	Gutierrez, Alicia	7	Document Review	5.50	$350	1,925.00	Reviewed Sanyo documents from custodian J DeCarlo.
8/6/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sanyo documents for custodian J DeCarlo.
8/7/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sanyo documents from custodian A. Hasegawa.
8/8/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Reviewed Sony documents from custodian A Hasegawa.
8/10/2014	771	Gutierrez, Alicia	7	Document Review	3.30	$350	1,155.00	Reviewed Sony documents for custodian J. Hamilton.
8/11/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed Sony documents from custodian J. Hamilton.
8/13/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed Sony documents from custodian J Hamilton.
8/12/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Sony documents from custodian J Hamilton.
8/14/2014	771	Gutierrez, Alicia	7	Document Review	7.30	$350	2,555.00	Reviewed Sony documents from custodian H Chaudhury (6.9); conference call with R. Spiegel and other document reviewers (.4).
8/15/2014	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Reviewed Sony documents for custodian H Chaudhury.
8/17/2014	771	Gutierrez, Alicia	7	Document Review	2.00	$350	700.00	Reviewed Sony documents from custodian H Chaudhury.
8/18/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Reviewed Sony documents from custodian H Chaudhury.
8/19/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed Sony documents from custodian T Hayakawa.
8/20/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed Sony documents from custodian T Hayakawa.
8/21/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Reviewed Sony documents from custodian S. Jaska, T. Hayakawa.
8/22/2014	771	Gutierrez, Alicia	7	Document Review	7.30	$350	2,555.00	Reviewed Sony documents fro custodian S Jaska (6.3); prepared memorandum summarizing hot documents identified (1.0).
8/25/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed Sony documents from custodian G. King.
8/26/2014	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Reviewed Sony documents from custodian G King.
11/7/2014	771	Gutierrez, Alicia	7	Document Review	7.80	$350	2,730.00	Reviewed and coded Sony documents (7.3); drafted coding summary for K. Jones (.5).
11/10/2014	771	Gutierrez, Alicia	7	Document Review	8.30	$350	2,905.00	Reviewed and coded documents (7.8); drafted coding summary for K. Jones (.5).
11/12/2014	771	Gutierrez, Alicia	7	Document Review	4.50	$350	1,575.00	Reviewed and coded Sony documents (.4); drafting coding summary for K. Jones (.5).
11/13/2014	771	Gutierrez, Alicia	7	Document Review	2.00	$350	700.00	Reviewed and coded Sony documents (1.5); drafted coding summary for K. Jones (.5).
11/14/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Reviewed and coded Sony documents (3.5); drafted coding summary for K. Jones (.5).
11/24/2014	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Reviewed and coded Sony documents (3.5); drafted coding summary for K. Jones (.5).
11/25/2014	771	Gutierrez, Alicia	7	Document Review	7.00	$350	2,450.00	Reviewed and coded Panasonic documents (6.5); drafted coding summary for K. Jones (.5).
12/1/2014	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	Reviewed Panasonic documents(5.8) and drafted summary coding sheet (.5).
12/3/2014	771	Gutierrez, Alicia	7	Document Review	6.50	$350	2,275.00	Reviewed and coded Panasonic documents (6.0); completed coding review sheet per K. Jones' instructions (.5).
11/26/2014	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed and coded Panasonic documents (5.5); drafting coding summary for K. Jones (.5).
1/9/2015	771	Gutierrez, Alicia	7	Document Review	6.00	$350	2,100.00	Reviewed Panasonic and Sony document (5.5); drafting coding summary per K. Jones' instructions (.5).
1/8/2015	771	Gutierrez, Alicia	7	Document Review	3.00	$350	1,050.00	Reviewed Panasonic documents (2.5); drafted coding summary per K. Jones' instructions (.5).
1/6/2015	771	Gutierrez, Alicia	7	Document Review	6.50	$350	2,275.00	Participated in weekly conference call (.5). Reviewed documents (5.5) and drafted coding summary per K. Jones' instructions (.5).
1/12/2015	771	Gutierrez, Alicia	7	Document Review	4.30	$350	1,505.00	Reviewed Sony documents (3.8); drafted coding summary per K. Jones' instructions (.5).
12/10/2014	771	Gutierrez, Alicia	7	Document Review	5.00	$350	1,750.00	Reviewed Panasonic documents (4.5); drafted coding summary per K. Jones' instructions (.5).
12/16/2014	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Reviewed Sony documents (2.5); drafted coding summary per K. Jones' instructions (.5); document review team call (.5).
1/15/2015	771	Gutierrez, Alicia	7	Document Review	4.30	$350	1,505.00	Reviewed Panasonic and Sony documents (3.8); drafted coding summary per K. Jones' instructions (.5).
1/16/2015	771	Gutierrez, Alicia	7	Document Review	5.50	$350	1,925.00	Reviewed Panasonic documents (5.0); drafted coding summary per K. Jones' instructions (.5).

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
1/20/2015	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Participated in conference call with reviewers (.5); coded Sony documents (2.5) and drafted coding sheet per K Jones' instructions (.5).
1/21/2015	771	Gutierrez, Alicia	7	Document Review	4.00	$350	1,400.00	Reviewed documents (3.5) and edited coding summary per K. Jones' directions (.5).
4/22/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Meeting with E. Levens and J. Prince to discuss responses to Defendants' discovery requests (.5); reviewed Defendants' discovery requests (.3).
4/27/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.50	$350	875.00	Meeting with B. Johnson, D. Johnson and J. Prince regarding coordinating Plaintiff document collection (.5); [redacted] (.3); reviewed the discovery requests and the operative complaint (1.8).
5/5/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	7.30	$350	2,555.00	Drafted interrogatory responses for class representatives (3.0); [redacted] (.3); reviewed documents provided by class representatives (4.0).
5/6/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	8.50	$350	2,975.00	Reviewed documents from class representatives (5.0); drafted interrogatory responses for class representatives (3.0); meeting with D. Young to discuss draft responses (.5).
4/28/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.00	$350	700.00	Reviewed documents sent in by class representatives (1.0); began drafting interrogatory responses (1.0).
4/29/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Reviewed documents provided by class representatives (1.0); drafted interrogatory responses (1.3).
4/30/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.50	$350	875.00	Reviewed documents provided by plaintiffs (.5), began drafting interrogatory responses (1.5); meeting with D. Young to discuss drafting interrogatories (.5). [redacted] (.2); reviewed materials and notes for other discovery responses (1.5); drafted named plaintiff responses to interrogatories (.8).
5/1/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.50	$350	875.00	Reviewed documents and call note for discovery responses (2.0); drafted named plaintiff responses to interrogatories (5.0); meeting with D. Young to discuss drafting interrogatory responses (.5).
5/4/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	7.50	$350	2,625.00	Meeting with D. Young and J. Prince to discuss compiling documents for named plaintiffs to produce (.2); reviewed plaintiff documents (.3).
5/28/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Reviewed and analyzed plaintiff documents and communications from co-counsel.
5/29/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.00	$350	700.00	Reviewed and analyzed filings and documents for named plaintiffs.
6/1/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	3.30	$350	1,155.00	Communications with co-counsel regarding compiling named Plaintiff responses to Toshiba RFP (.5); communications with D. Young regarding process to collect named plaintiff responses (.5).
9/15/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Conference call with D. Young, J. Prince and co-counsel regarding compiling named Plaintiff responses to Toshiba RFP (1.3); communications with co-counsel regarding scheduling calls with the named plaintiffs (1.0).
9/14/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Reviewed and coded Endo documents (2.5); reviewed Endo documents related to marketing and market definition (.5); drafted memo summarizing relevant portions of documents to assist expert analysis of the relevant product market (.5).
9/9/2015	771	Gutierrez, Alicia	7	Document Review	3.50	$350	1,225.00	Reviewed and coded Endo documents (4.5); reviewed Endo documents related to marketing and market definition(2.0); drafted memo summarizing relevant portions of documents to assist expert analysis of the relevant product market (1.0).
9/10/2015	771	Gutierrez, Alicia	7	Document Review	7.50	$350	2,625.00	Discussion with D. Young regarding named plaintiff RFP responses (.5); communications with co-counsel regarding scheduling time to talk with named plaintiffs (.5).
9/16/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	Reviewed Endo documents related to marketing and market definition (5.0); drafted memo summarizing relevant portions of documents to assist expert analysis of the relevant product market (1.3).
9/16/2015	771	Gutierrez, Alicia	7	Document Review	6.30	$350	2,205.00	

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
9/29/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	2.30	$350	805.00	Meeting with D. Young and J. Prince regarding outstanding discovery issues (.5); reviewed correspondence and other documents to determine status of discovery for certain named Plaintiffs in advance of meet and confer (1.5); provided summary of outstanding issues to D. Young (.3).
9/25/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.80	$350	280.00	Call with named plaintiff William Cabral and his counsel regarding Toshiba Interrogatories (.5); updated summary of named plaintiff communications and response to Interrogatories (.3).
9/18/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	[redacted]
9/21/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	1.00	$350	350.00	[redacted]
9/21/2015	771	Gutierrez, Alicia	7	Document Review	6.50	$350	2,275.00	Reviewed Endo documents related to marketing and market definition (5.0); drafted memo summarizing relevant portions of documents to assist expert analysis of the relevant product market (1.5).
11/24/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Meeting with D Young regarding plaintiff D'Orzario (.2); reviewed documents and drafted email to his counsel regarding outstanding issues (.3).
12/1/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Drafted email to P Safirstein regarding outstanding issues with Plaintiff D'Orzario (.3); drafted email to D Young regarding whether to drop Plaintiff D'Orzario as a named plaintiff (.2).
11/5/2015	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.30	$350	105.00	Communications with C Voigt re: named plaintiff verifications.
1/7/2016	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Communications with co-counsel regarding Plaintiff verifications (.2); collected and forwarded Plaintiff interrogatory verifications to co-counsel (.3).
1/8/2016	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.50	$350	175.00	Communications with co-counsel regarding Plaintiff verifications (.2); collected and forwarded Plaintiff interrogatory verifications to co-counsel (.2); communications with D Young regarding assignment (.1).
3/11/2016	771	Gutierrez, Alicia	3	Drafting Discovery Answers/Responses	0.30	$350	105.00	Meeting with D Young to discuss calls to plaintiffs re: RFA verifications.
6/3/2014	1298	Gutierrez, Alicia, R.	7	Document Review	6.30	$350	2,205.00	Review and code Endo documents.
6/6/2014	1298	Gutierrez, Alicia, R.	7	Document Review	5.00	$350	1,750.00	Reviewed background materials for document review (1.0), document review (4.0).
6/4/2014	1298	Gutierrez, Alicia, R.	7	Document Review	4.30	$350	1,505.00	Reviewed background materials for document review (3.8); conference call for document review training (.5).
6/9/2014	1298	Gutierrez, Alicia, R.	7	Document Review	6.50	$350	2,275.00	Review and code Sanyo documents.
6/11/2014	1298	Gutierrez, Alicia, R.	7	Document Review	7.00	$350	2,450.00	Review and code Sanyo documents.
6/10/2014	1298	Gutierrez, Alicia, R.	7	Document Review	3.50	$350	1,225.00	Review and code Sanyo documents.
3/3/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/4/2014	1409	Kitchen, Kristena	7	Document Review	7.00	$300	2,100.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/5/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/6/2014	1409	Kitchen, Kristena	7	Document Review	9.80	$300	2,940.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/7/2014	1409	Kitchen, Kristena	7	Document Review	7.00	$300	2,100.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
2/26/2014	1409	Kitchen, Kristena	7	Document Review	4.50	$300	1,350.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
2/27/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
2/28/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/10/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/11/2014	1409	Kitchen, Kristena	7	Document Review	7.00	$300	2,100.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/12/2014	1409	Kitchen, Kristena	7	Document Review	8.80	$300	2,640.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
3/13/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/14/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/17/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/18/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/19/2014	1409	Kitchen, Kristena	7	Document Review	7.80	$300	2,340.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/20/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/21/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/24/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/25/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/26/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
3/27/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/5/2014	1409	Kitchen, Kristena	7	Document Review	6.00	$300	1,800.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/6/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/9/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/10/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter.
6/11/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/12/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/13/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/16/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/17/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/18/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
6/19/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/20/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/23/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/24/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/25/2014	1409	Kitchen, Kristena	7	Document Review	6.80	$300	2,040.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/26/2014	1409	Kitchen, Kristena	7	Document Review	8.80	$300	2,640.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
6/27/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
6/30/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/1/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/2/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/3/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/4/2014	1409	Kitchen, Kristena	7	Document Review	1.50	$300	450.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/7/2014	1409	Kitchen, Kristena	7	Document Review	7.50	$300	2,250.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
7/8/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
7/9/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
7/10/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, NEC custodians.
7/11/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/14/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/15/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/16/2014	1409	Kitchen, Kristena	7	Document Review	6.50	$300	1,950.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Panasonic custodians.
7/17/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/18/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/21/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/22/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/23/2014	1409	Kitchen, Kristena	7	Document Review	6.80	$300	2,040.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/24/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/25/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/28/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/29/2014	1409	Kitchen, Kristena	7	Document Review	9.00	$300	2,700.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/30/2014	1409	Kitchen, Kristena	7	Document Review	7.00	$300	2,100.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
7/31/2014	1409	Kitchen, Kristena	7	Document Review	7.50	$300	2,250.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
8/1/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
8/4/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.
8/5/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony custodians.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
8/6/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sony and Sanyo custodians.
8/7/2014	1409	Kitchen, Kristena	7	Document Review	6.80	$300	2,040.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/8/2014	1409	Kitchen, Kristena	7	Document Review	9.00	$300	2,700.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/11/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/12/2014	1409	Kitchen, Kristena	7	Document Review	8.30	$300	2,490.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/13/2014	1409	Kitchen, Kristena	7	Document Review	7.50	$300	2,250.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/14/2014	1409	Kitchen, Kristena	7	Document Review	7.50	$300	2,250.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/15/2014	1409	Kitchen, Kristena	7	Document Review	9.00	$300	2,700.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/18/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/19/2014	1409	Kitchen, Kristena	7	Document Review	8.50	$300	2,550.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/20/2014	1409	Kitchen, Kristena	7	Document Review	8.00	$300	2,400.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/21/2014	1409	Kitchen, Kristena	7	Document Review	6.80	$300	2,040.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/22/2014	1409	Kitchen, Kristena	7	Document Review	6.30	$300	1,890.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/23/2014	1409	Kitchen, Kristena	7	Document Review	1.00	$300	300.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
8/25/2014	1409	Kitchen, Kristena	7	Document Review	8.80	$300	2,640.00	Review and code Japanese documents for Lithium Batteries Antitrust matter, Sanyo custodians.
2/26/2014	1410	Henry, Collier	7	Document Review	5.00	$350	1,750.00	Review and code Defendants' documents.
2/27/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Reviewing documents (6.0), reading materials in antitrust litigation (1.0), participated in two conference calls re: case (1.0).
2/28/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review coding manual, MTD opinion, amended complaint (7.0); document review (1.0).
3/3/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review coding manual, MTD opinion, amended complaint.
3/4/2014	1410	Henry, Collier	7	Document Review	7.00	$350	2,450.00	Review and code Defendants' documents, Sanyo custodians.
3/5/2014	1410	Henry, Collier	7	Document Review	8.50	$350	2,975.00	Review and code Defendants' documents, Sanyo custodians.
3/6/2014	1410	Henry, Collier	7	Document Review	8.50	$350	2,975.00	Review and code Defendants' documents, Sanyo custodians.
3/7/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Sanyo custodians.
3/10/2014	1410	Henry, Collier	7	Document Review	8.80	$350	3,080.00	Review and code Defendants' documents, Sanyo custodians.
3/11/2014	1410	Henry, Collier	7	Document Review	7.80	$350	2,730.00	Review and code Defendants' documents, Sanyo custodians.
3/12/2014	1410	Henry, Collier	7	Document Review	7.50	$350	2,625.00	Review and code Defendants' documents, Sanyo custodians.
3/13/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Sony custodians.
3/14/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Sony custodians.
3/18/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Sony custodians.
3/19/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Sony custodians.
3/20/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Panasonic custodians.
3/21/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Panasonic custodians.
3/24/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Panasonic custodians.
3/25/2014	1410	Henry, Collier	7	Document Review	8.00	$350	2,800.00	Review and code Defendants' documents, Panasonic custodians.
3/26/2014	1410	Henry, Collier	7	Document Review	4.50	$350	1,575.00	Review and code Defendants' documents, Panasonic custodians.
6/17/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/18/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/19/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
6/22/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/23/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/24/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/25/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/26/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/29/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
6/30/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/1/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/3/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/2/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/6/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/7/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/8/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/9/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/10/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/13/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Toshiba, H. Kubo custodial files.
7/14/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/15/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/16/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/17/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/20/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/21/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/22/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/23/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/24/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Hanada & KaKumoto custodial files.
7/27/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
7/28/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
7/29/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
7/30/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
7/31/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
8/3/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
8/4/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
8/5/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
8/6/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by Hitachi, Akagawa & Sumoto custodial files.
8/7/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/10/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/11/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.

Date	Tkpr	TKPR Name	Activity Code	Activity Description	Hours	Rate	Lodestar	Narrative
8/12/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/13/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/14/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/17/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/18/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/19/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/20/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/21/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/24/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/25/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/26/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/27/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by defendants.
8/28/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
8/31/2015	1494	Sung, Jack	7	Document Review	8.00	$325	2,600.00	Review and code documents producted by NEC, Takeshima custodial files.
					2,938.30		**$ 1,000,603.00**	

EXHIBIT E

EXHIBIT E

IN RE Lithium Ion Batteries Antitrust Litigation

COHEN MILSTEIN SELLERS & TOLL, PLLC

Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	33.32
Transcripts (Hearing, Deposition, etc)	
Investigation	
Lexis/Westlaw	457.01
Messenger/Delivery	
Photocopies - In House (Capped at $0.20 per Copy)	
Photocopies - Outside	
Postage	
Service of Process	
Supplies	
Telephone / Telecopier	115.36
Travel	35.91
Miscellaneous	
TOTAL:	**$641.60**

EXHIBIT 20

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF KATHERINE VAN DYCK IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF [CUNEO GILBERT & LADUCA, LLP**

I, Katherine Van Dyck, declare:

1. I am a partner of Cuneo Gilbert & LaDuca, LLP ("CGL"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Matt Bryant and Patrick McGuinness and as counsel for IPPs throughout the course of this litigation. The background and experience of CGL and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, CGL performed the following work: Research and preparation of various briefs and legal memoranda and assistance with discovery, including the preparation of class representative interrogatory responses, compilation of class representative documents responsive to requests for production, preparation for class representative depositions, coordination of lengthy forensic searches of class representative electronic devices, and review of documents produced by defendants.

5. Attached hereto as **Exhibit B** is a billing summary of CGL's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by CGL. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by CGL and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Katherine Van Dyck in Support

of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of CGL and filed on May 26, 2017. (ECF No. 1813-14). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by CGL since June 1, 2013 was 396.5, with a corresponding lodestar of $ $237,228.50 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses CGL has incurred from June 1, 2013 to present, plus applicable case filing fees. CGL expended a total of $52,340.53 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by CGL on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by CGL in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 12, 2019 at Washington, D.C.

/s/ Katherine Van Dyck

Katherine Van Dyck

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

CUNEO GILBERT & LADUCA, LLP
FIRM PROFILE

We specialize in civil litigation in federal and state courts, including general commercial practice, antitrust, civil rights, government relations, products liability, administrative, securities, labor, and consumer law.

With a proven track record of winning in court and in Congress, we have represented and served clients since 1988 on issues of broad significance. Neither a mega-firm with 200 plus attorneys, nor a small firm with limited expertise, we are instead a group of twenty plus lawyers who together have over 300 years of experience going to court to right wrongs. We specialize in representing individuals and businesses that have been victims of antitrust violations, faulty products, civil rights violations, and securities fraud.

TRIAL AND APPELLATE
Cuneo Gilbert & LaDuca attorneys are experienced advocates. Between them, our attorneys have:

- conducted numerous trials, the most recent of which resulted in a $113 million verdict on behalf of our clients;
- argued scores of contested motions in state and federal court and conducted quasi-adjudicative, administrative, and arbitral proceedings resulting in a final adjudication;
- argued appeals in many federal circuit courts of appeal, including two *en banc* arguments;
- argued appeals in many states;
- testified before Congress, state legislatures or federal or state administrative bodies at least 60 times; and
- appeared in many cases before the United States Supreme Court.

GOVERNMENT SERVICE
Cuneo Gilbert & LaDuca attorneys have held positions of trust in state or federal governments, including:

- One was Solicitor to the House of Representatives and Assistant Counsel to the Senate;
- One was the Executive Director of a Federal agency, the highest staff position;
- Two were Section Chiefs of the United States Department of Justice;
- Three were Assistant US attorneys and one was a public defender; and

- Two were Counsel to Congressional Committees.

ACADEMIC ACHIEVEMENTS/CLERKSHIPS
Cuneo Gilbert & LaDuca attorneys have strong academic qualifications, and many were judicial clerks or interns. Of our attorneys:

- Eight were law review members or editors;
- Twelve served as judicial law clerks or interns;
- Three worked at the United States Court of Appeals;
- Five worked at United States District Courts; and
- Two worked for state courts.

SPEAK YOUR LANGUAGE
Cuneo Gilbert & LaDuca attorneys are diverse. Among our attorneys and staff, we speak:

- English
- Spanish
- French
- Mandarin
- Russian

COMMUNITY AND CHARITY
Cuneo Gilbert & LaDuca, LLP supports many charities in our community, both in the United States and abroad. Over the past five years, CGL has contributed to organizations supporting equal justice, centers for human rights, groups combatting hunger, medical centers and universities in Israel, cancer research efforts, cancer survivor support, legal programs, law schools, juvenile justice initiatives, better government, and wounded veterans of the Iraqi and Afghanistan wars. CGL has also made a major financial commitment to help indigent clients seek representation in the District of Columbia through the “Raising the Bar” campaign of the D.C. Access to Justice Project.

ATTORNEYS

Jonathan W. Cuneo, born New York, New York, September 10, 1952. Admitted to the District of Columbia Bar, 1977; New York Bar, 2006. Admitted to practice before the United States Supreme Court, 1994; United States Court of Appeals for the First Circuit, 2006; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Fourth Circuit, 2005; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2007; United States Court of Appeals for the Tenth Circuit, 2011; United States Court of Appeals for Eleventh Circuit, 2012; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the Eastern District of Michigan; United States District Court for the Eastern District of New York, 2006; United States District Court for the Southern District of New York, 2006; United States District Court for the Northern District of New York, 2002; United States District Court for the District of Columbia, 1978. Education: Columbia University (A.B., 1974); Cornell University (J.D., 1977). Experience: Law clerk to the Honorable Edward Tamm, United States Court of Appeals, District of Columbia Circuit (1977-1978); Attorney, Office of the General Counsel, Federal Trade Commission (1978-1981); Assistant Counsel and Counsel, Subcommittee on Monopolies and Commercial Law, House Committee on the Judiciary (1981-1986); General Counsel, Committee to Support the Antitrust Laws (1986 - 2004); Legislative Counsel, National Association of Shareholder and Consumer Attorneys (1988-2004); Legislative Counsel, National Coalition of Petroleum Retailers and Service Station Dealers of America (1988-1994). Activities: Arlington County Democratic Committee (1983-1987); Board Member, Juvenile Law Center (2009-2015); Board Member, American Antitrust Institute (1998-2009); Board Member, Violence Policy Center (1999-2009); Board Member, Appleseed Legal Foundation (1999-2005). Honors: Alfred E. Kahn Award for Antitrust Achievement (2017); Rated by Martindale-Hubbell as AV® Preeminent™; Listed in Marquis "Who's Who in America"; Dean's Board of Advisors, The George Washington University Law School (2012-2015); Finalist, 2006 Trial Lawyer of the Year, Public Justice. Publications: *Judge Tamm and the Evolution of Administrative Law: The Art of Judging*, 74 GEORGETOWN L.J. 1595 (1986); *Pulling the Plug on Antitrust Law* (with Jerry Cohen), THE NATION (1987); *House Takes Up Cause of Discounters*, LEGAL TIMES, Vol X, No. 30 (1987); *Supreme Court's "Sharp" Ruling Means Higher Prices, Fewer Choices for Consumers*, MANHATTAN LAWYER (1988); Chapter, *Consumer Protection -- Federal Trade Commission*, CHANGING AMERICA: BLUEPRINTS FOR THE NEW ADMINISTRATION (edited by Mark Green) (1992); *Antitrust and Clinton: Changes on the Horizon*, THE CALIFORNIA LAWYER (1993); *Action on Class Actions*, THE RECORDER (1997); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust Era Victims* (with Professor Charles Tiefer), 27 CLASS ACTION REPORTS 139 (2006); THE INTERNATIONAL HANDBOOK OF PRIVATE ENFORCEMENT OF COMPETITION LAW (with Albert A. Foer) (Edward Elgar Publishing Inc., 2010). *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine*, 82 Geo. Wash. L. Rev. Arguendo 59 (2013). Guest Lecturer: Southwestern Law School, 1997 and 1998; numerous appearances in CLE programs in the United States and Canada; District of Columbia Judicial Conference (2007). Member: American Bar Association; District of Columbia Bar Association; American Association for Justice.

Pamela B. Gilbert, born New Brunswick, New Jersey, October 3, 1958. Admitted to the New York Bar, 1985 (inactive); District of Columbia Bar 1986. Admitted to practice in D.C. Education: Tufts

University (B.A., *magna cum laude*, 1980); New York University (J.D., 1984). Experience: Consumer Program Director, United States Public Interest Research Group (1984-1989); Legislative Director, Executive Director, Public Citizen's Congress Watch (1990-1992; 1992-1994); Attorney, M+R Strategic Services (1995); Executive Director, Consumer Product Safety Commission (1996-2001); Chief Operating Officer, M+R Strategic Services (2001-2002). Honors and Activities: Board Chair, American Antitrust Institute (2010 -); Board Member, Project on Government Oversight (2016 -); Past member of the Board of Directors, National Environmental Law Center (2006 - 2016); Past member of Board of Directors, Equal Justice Works (2004 - 2012). Publications: PRIVATE ENFORCEMENT OF THE ANTITRUST LAWS IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz), "Proposals for Reform," written with Victoria Romanenko. Member: New York Bar Association; District of Columbia Bar Association; American Bar Association; American Association for Justice; Public Justice; Consumer Attorneys of California.

Charles J. LaDuca, born Buffalo, New York, September 30, 1974. Admitted to the New York State Bar, 2001; District of Columbia Bar, 2002; United States Supreme Court, 2009; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Sixth Circuit, 2012; United States Court of Appeals for the Ninth Circuit, 2011; United States Court of Appeals for the District of Columbia Circuit, 2013; United States District Court for the Northern District of New York, 2002; United States District Court for the Western District of New York, 2004; United States District Court for the Southern District of New York, 2013; United States District Court for the District of Columbia, 2002; United States District Court for the Central District of Illinois, 2009; United States District Court for the District of Colorado, 2008; United States District Court for the Western District of Michigan, 2010. Education: George Washington University (B.A., 1996); Catholic University of America (J.D., 2000). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section); New York State Bar Association; New York State Society.

Joel Davidow, born Trenton, New Jersey, July 24, 1938. Admitted to the Bar in the District of Columbia, 1965; New York Bar, 1981; Court Admissions: U.S. Supreme Court, U.S. Court of Appeals (D.C., Ninth, First and Federal Circuits), U.S. District Court, S.D. N.Y., U.S. District Court, E.D. N.Y. Education: Columbia University School of Law (LLB, *cum laude*, 1963); Princeton University, Woodrow Wilson School of Public Affairs (B.A., *summa cum laude*, 1960). Experience: Notes editor of the Columbia Law Review and the winner of the National Jessup Moot Court Competition; Two years in the U.S. Federal Trade Commission; Fifteen years in Antitrust Division of the Department of Justice, where he eventually served as Chief of the Foreign Commerce Section and then Director of Policy and Planning; Senior antitrust partner in major New York City and Washington, D.C. law firms, representing clients from Japan, Europe, and the United States, as both plaintiffs and defendants, in antitrust, patent, and trade litigation matters; Counsel of record in numerous antitrust class actions and has briefed and argued multi-million dollar appeals before the First, Second, Seventh, Ninth and Federal Circuit courts of appeal. Publications: ANTITRUST GUIDE FOR INTERNATIONAL BUSINESS ACTIVITIES (BNA, 4th ed. 2011); PATENT-RELATED MISCONDUCT ISSUES IN U.S. LITIGATION (OUP, 2010); and numerous articles dealing with international antitrust and patent litigation topics. Adjunct Professor: George Washington University School of Law, Columbia Law School, Georgetown Law Center, American University Law School, and George Mason University Law School, where he has taught courses in antitrust, regulation, and international

competition policy.

Daniel M. Cohen, born Detroit, Michigan, January 24, 1958. Admitted to the Florida Bar, 1989; District of Columbia Bar, 2001; Maryland State Bar, 2003; Virginia State Bar, 2010. Admitted to practice before the United States District Court for Maryland, 2002; United States District Court for the Middle District of Florida, 2003; United States District Court of District of Columbia, 2008; Eastern District of Virginia, 2010; Western District of Virginia, 2010; Southern District of Florida, 2013. Education: Ithaca College (B.A., 1981); Wes tern New England School of Law (J.D., 1988). Experience: Criminal Defense Trial Attorney, Public Defenders Office, tried 70 jury trials, Jacksonville Florida, 1989-1999. Member: District of Columbia Bar Association (Antitrust and Consumer Law Section); Florida State Bar Association.

Michael J. Flannery, born January 22, 1963. Admitted to the Virginia Bar, 1991; District of Columbia Bar, 1992; California Bar, 1998; Missouri Bar, 2001. Admitted to practice before the United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Ninth Circuit; United States District Court for the Eastern District of Missouri, United States District Court for the Western District of Missouri, United States District Court for the Southern District of Illinois, United States District Court for the Northern District of Illinois, United States District Court for the Northern District of California, United States District Court for the Southern District of California, United States District Court for the Central District of California, United States District Court for the Eastern District of California, and the United States District Court for the District of Columbia. Education: University of Notre Dame (B.A., 1985); College of William and Mary Marshall-Wythe School of Law (J.D., 1991). Honors and Awards: William and Mary Law Review (1989-91); Publication of Student Note: "Abridged Too Far: Anticipatory Search Warrants and the Fourth Amendment," 32 WM. & MARY L. REV. 781 (1991) (reprinted in 14 Criminal Law Review (1992)); Teaching Assistant, William and Mary Legal Skills Program; Chief Justice, William and Mary Honor Council; Notre Dame Scholar/Edward W. Krause Academic Scholarship. Experience: Cohen, Milstein, Hausfeld & Toll, Washington, DC, 1994-1997; Milberg Weiss Bershad Hynes & Lerach, San Diego, CA, 1997-2000; Carey, Danis & Lowe, St. Louis, MO, 2000-2012.

Monica Miller, born Queens, New York, May 16, 1966. Admitted to the Bar of the Commonwealth of Massachusetts, 1992; Louisiana Bar, 1993; District of Columbia Bar, 1994. Admitted to practice before the United States Courts of Appeals for the First Circuit, 1998, Fourth Circuit, 2010, Ninth Circuit, 2010, Tenth Circuit, 2011, D.C. Circuit, 2012; United States District Court for the District of Massachusetts, 1994; United States District Court for the District of the District of Columbia, 2008. Education: Tufts University (B.A., *magna cum laude*, 1988); University of Virginia (J.D., 1991). Experience: Law Clerk to the Honorable Edith Brown Clement, United States District Court for the District of Louisiana, 1991-1993; Berman, DeValerio & Pease, Boston, MA 1994-1999; sole practitioner, 1999-2008. Languages: French, Spanish.

Mark H. Dubester, born Washington, DC, May 17, 1955. Admitted to the District of Columbia Bar, 1980; Member of the United States District Court for the District of Columbia. Education: Tufts University (B.A., *magna cum laude,* 1977); New York University School of Law (J.D., 1980). Experience: Trial Attorney, United States Department of Justice, Antitrust Division (*AT&T* case) (1980-1983); Assistant United States Attorney, United States Attorneys Office for

the District of Columbia (60 jury trials) (1983-2007); Counsel for the Committee and Special Impeachment Counsel, House Committee on the Judiciary (2007-2010); Deputy Chief Investigative Counsel, Special Inspector General for the Troubled Asset Relief Program (SIGTARP) (2011-2012); Associate General Counsel/Prosecutor, Special Inspector General for Afghanistan Reconstruction (SIGAR) (2012-2017).

Alexandra C. Warren, born Bucharest, Romania, October 9, 1977. Admitted to the Florida Bar, 2016; New York Bar, 2003 (retired); Massachusetts Bar, 2003 (retired); Pennsylvania Bar, 2004 (retired); District of Columbia Bar, 2007 (retired). Admitted to practice before the United States District Court for the Eastern District of Pennsylvania, 2005; United States District Court for the Western District of Pennsylvania, 2007; United States District Court for the District of Columbia, 2007; United States District Court for the Middle District of Pennsylvania, 2009; United States District Court for the Western District of Michigan, 2010; United States District Court for the District of Massachusetts, 2012; United States Court of Appeals for the Third Circuit, 2009; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2011; United States Supreme Court, 2009. Education: Brandeis University (B.A., *cum laude*, 1999); Fordham University Law School (J.D., 2002) (Fordham Environmental Law Journal, Staff). Honors: Archibald R. Murray Public Service Award (2002); Addison M. Metcalf Labor Law Prize (2002). Experience: Law Clerk to the Honorable John E. Jones III, United States District Court for the Middle District of Pennsylvania (2002-2004); Associate, MacElree Harvey, Ltd. (2004-2006). Member: Florida Bar Association.

Katherine W. Van Dyck, born Corpus Christi, Texas, July 4, 1979. Admitted to the Texas Bar, 2004; District of Columbia Bar, 2008. Admitted to practice before the United States District Court for the Northern District of Texas, 2006; United States District Court for the District of Columbia, 2008; United States District Court for the District of Colorado, 2014; United States District Court for the Central District of Illinois, 2018; United States Court of Appeals for the Fourth Circuit, 2009; United States Court of Appeals for the Tenth Circuit, 2015; United States Court of Appeals for the Seventh Circuit, 2016. Education: Texas Christian University (B.A. 2001); Texas Tech University Law School (J.D., 2004). Texas Tech Law Review - Articles Editor, Outstanding Third Year Editor, Outstanding Second Year Editor (2002-2004) Experience: Law Clerk to the Honorable Hayden W. Head, Jr., United States District Court for the Southern District of Texas (2004-2006); Associate, Fee, Smith, Sharp & Vitullo, LLP (2006-2007); Associate, Griffith & Wheat, LLP (2008-2012). Affiliations: Member, Texas Christian University DC Alumni Board; American Association for Justice Seminar Faculty Member, Trying the Class Action: Practical Tips from the Pros.

Jennifer E. Kelly, born Elmira, New York, July 7, 1975. Admitted to the Maryland Bar, 2007, District of Columbia Bar, 2008, U.S. District Court for the District of Columbia, 2012. Education: Boston University (B.A., *cum laude*, 1997), American University (J.D., *cum laude*, 2007; highest grade designation, Wills, Trusts, & Estates). Experience: Internship, Parliament of Great Britain (1995); Internship, District of Columbia Corporation Counsel (1996); Legislative Assistant, Office of Senator Robert C. Byrd (1998-2002); American University Civil Practice Clinic (Oral Argument before the Maryland Court of Special Appeals and Maryland District Court Small Claims Trial) (2006); Associate, Bracewell & Giuliani, LLP (2007-2009) (Paralegal, 2003-2007); Volunteer Attorney, American Red Cross (2010-2011). Member: American Bar Association.

Brendan S. Thompson, born Buffalo, New York, February 21, 1974. Admitted to the Maryland Bar, 2008; Admitted to practice before the United States District Court for the District of Colorado, 2008; United States District Court for the Central District of Illinois, 2008; United States Court of Appeals for the Ninth Circuit, 2011. Education: University of Detroit (B.S., 1997); visiting student, George Mason Law School; University of Baltimore Law School (J.D., 2008). Experience: Student Internships: Congressman Brian Higgins (D-NY) (2007); Chambers of the Honorable LeRoy F. Millett Jr., Circuit Court for the 31st Judicial Circuit of Virginia (2006); The Commonwealth's Attorney's Office for Prince William County, Virginia (2005). Member: Maryland State Bar Association, Bar Association of Baltimore City, American Bar Association; New York State Society.

Victoria R. Sims, born Kiev, Ukraine, April 8, 1983. Admitted to the Maryland Bar, 2009; the District of Columbia Bar, 2012. Education: Catholic University, Columbus School of Law (J.D., 2009); Brandeis University (B.A., with honors, 2006). Experience: Worked at a Washington D.C. firm engaging in antitrust and telecommunications litigation (2009-2011). Law Clerk at U.S. International Trade Commission (2009) (antidumping, countervailing duties, Section 337). Law Clerk at Department of Labor (2008) (Occupation Safety and Health Division). Law Clerk at District of Columbia Office of the Attorney General (2007) (Civil Enforcement Section). Ms. Sims was also nominated for the 2009 Jan Jancin award upon her completion of law school. This nomination is given to the student with the highest Intellectual Property GPA in the graduating class. Ms. Sims is the recipient of the American Antitrust Institute's Outstanding Litigation Achievement by a Junior Lawyer Award (2017), for her work in the *Automotive Parts Antitrust Litigation*, 12-md-02311. Publications: *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine*, 82 Geo. Wash. L. Rev. Arguendo 59 (2013); PRIVATE ENFORCEMENT OF THE ANTITRUST LAW IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz) (2012), Chapter, *Proposals for Reform*, co-authored with Pamela Gilbert. Ms. Sims has a working knowledge of Russian and French.

Beatrice O. Yakubu, born Melbourne, Florida, January 3, 1984. Admitted to the Maryland Bar, 2010. Education: American University, Washington College of Law (J.D. 2010); Florida State University (B.S. 2005). Experience: clerked at the United States Attorney's Office and a criminal defense firm, and worked as a Student Attorney for the Mid-Atlantic Innocence Project. Ms. Yakubu is conversational in the Yoruba language.

Yifei Li, born Wuhan, China, February 15, 1988. Admitted to the New York State Bar, 2013; United States Court of Appeals for the Second Circuit, 2013; United States Court of Appeals for the District of Columbia Circuit, 2013; United States Court of Federal Claims, 2013; United States District Court for the Eastern District of Michigan, 2013; United States District Court for the Eastern District of New York, 2013; United States District Court for the Southern District of New York, 2013. Education: The George Washington University Law School (LL.M., 2011); Beijing Foreign Studies University Law School (LL.B., B.A., Scholarship Recipient, 2010). Experience: Judicial Intern to the Honorable Chief Judge Randall R. Rader at U.S. Court of Appeals for the Federal Circuit (2012-2013). Legal Intern at Federal Circuit Bar Association (2011-2012). Law Clerk at Jingtian & Gongcheng Attorneys At Law (2009). Judicial Intern at People's Court of Jiang'An District (2007).

Member: New York State Bar Association; American Bar Association. Ms. Li is a native speaker of Chinese (Mandarin).

A. Blaine Finley, born Houston, Texas, January 15, 1988. Admitted to the New Jersey Bar, 2014; New York Bar 2015; District of Columbia Bar, 2017. Admitted to practice before the United States District Court for the District of New Jersey, 2014; United States District Court for the Eastern District of New York, 2015; United States District Court for the Southern District of New York, 2015. Education: Columbia Law School (J.D., 2014); Princeton University (A.B., 2011). Experience: Associate, Brower Piven, A Professional Corporation (2014-2016).

Peter Gil-Montllor, born Manhasset, New York, October 11, 1987. Admitted to the New York Bar, 2014. Admitted to practice before the United States District Court for the Eastern District of New York, 2015; United States District Court for the Southern District of New York, 2015. Education: Georgetown University (J.D., magna cum laude, 2013); University of Chicago (A.B., with honors, 2009). Experience: Law clerk to the Honorable Allyne R. Ross, United States District Court for the Eastern District of New York (2015-2016). Member: Federal Bar Council. Mr. Gil-Montllor is a native speaker of Spanish.

Christian Hudson, born Southampton, New York, July 26, 1985. Admitted to the New York Bar, 2013. Admitted to practice before the United States District Court for the Southern District of New York, 2013; Eastern District of Texas, 2014; Eastern District of New York, 2018. Education: New York University (J.D., 2012); Yale University (B.A., with distinction, 2007). Experience: Associate, Gibson, Dunn & Crutcher LLP (2012-2018). Member: The Sedona Conference; LeGaL, the LGBT Bar Association of New York; American Bar Association.

SPECIAL COUNSEL

Robert J. Cynkar, born Chicago, Illinois, April 22, 1952. Admitted to the Illinois Bar, 1977; District of Columbia Bar, 1978; Virginia Bar, 1984. Admitted to practice before the United States Supreme Court and before the United States Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Eighth, Eleventh, District of Columbia Circuit, and Federal Circuits. Education: Princeton University (A.B., *magna cum laude*, 1974); New York University School of Law (J.D., 1977) (Staff, Law Review). Experience: Associate, Fried, Frank, Harris, Shriver & Kampelman, Washington, D.C. (1977-1979); Counsel to Chairman Bob Dole, Subcommittee on Improvements in Judicial Machinery, United States Senate Committee on the Judiciary (1979-1981); General Counsel to Chairman Paul Laxalt, Subcommittee on Regulatory Reform, United States Senate Committee on the Judiciary (1981-1983); Assistant United States Attorney, Eastern District of Virginia (Criminal Division) (1983-1985); Special Assistant to Attorney General Edwin Meese (1985); Deputy Assistant Attorney General, Civil Division, United States Department of Justice (1985-1988); Associate, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1988-1991); Partner, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1991-1996); Founding Partner, Cooper & Kirk, Washington, D.C. (1996-2003); Partner, Egan, Fitzpatrick, Malsch & Cynkar, Vienna, Virginia (2004-2006); has tried over 25 cases in federal and state courts; has briefed numerous appeals in the majority of Federal Circuits and in State Supreme Courts, and in the U. S. Supreme Court, and personally argued many of those appeals. Sample Noteworthy Cases: *U.S. v. Fleming* (E.D. Va.

1984) (successful prosecution of a drunk driver who killed a mother of 11 for second-degree murder); *U.S. v. Winstar* (U.S. Sup. Ct. 1996) (holding that even the requirements of a broad change in regulatory policy by Congress cannot excuse the federal government's breach of contract); *U.S. ex rel. Ubl v. IIF Data Solutions* (E.D. Va. 2009) (successful defense of a government contractor accused of violating the False Claims Act in a bet-the-company case); *Livingston v. Virginia Dept. of Transportation* (Va. Sup. Ct. 2012) (establishing that a damaging for public use does not need to rise to the level of a taking to qualify for just compensation under the Virginia Constitution); *Settle v. RGR,* (Prince William Cir. Ct. 2012)(over $3 million jury award for the widow of a truck driver killed in a collision with a train). Publications: *Dumping on Federalism*, 75 U. COLO. L. REV. 1261 (2004); *The Changing Vocabulary of Administrative Law*, 43 FOOD DRUG COSM. L.J. 681 (1988); "*Buck v. Bell*: *'Felt Necessities' v. Fundamental Values?*" 81 COLUM. L. REV. 1418 (1981). Member: District of Columbia Bar Association; Virginia Bar Association; Fairfax County Bar Association; Federalist Society.

OF COUNSEL TO THE FIRM

Charles Tiefer, born January 21, 1954. Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court; United States Court of Federal Claims. Education: Columbia University (B.A., *summa cum laude*, 1974), Harvard Law School (J.D., *magna cum laude*, 1977) (Member, Harvard Law Review). Experience: Law clerk, United States Court of Appeals for the D.C. Circuit (1977-1978); Trial Attorney, United States Department of Justice, Civil Rights Division (1978-1979); Assistant Senate Legal Counsel, United States Senate (1979-1984); Solicitor and Deputy General Counsel, United States House of Representatives (1984-1995); Professor of Law, University of Baltimore School of Law (1995 -). Publications: VEERING RIGHT: HOW THE BUSH ADMINISTRATION SUBVERTS THE LAW FOR CONSERVATIVE CAUSES (U. Cal. Berkeley, 2004); GOVERNMENT CONTRACT LAW: CASES AND MATERIALS (co-author) (Carolina Academic Press, 2d ed., 2004); THE SEMI-SOVEREIGN PRESIDENCY (Westview, 1994); CONGRESSIONAL PRACTICE AND PROCEDURE (Greenwood Press, 1989); *Congress's Transformative "Republican Revolution" in 2001-2006 and the Future of One-Party Rule*, J. L. & POL. OF U. VA. (2008); *The Iran Debacle: The Rise and Fall of Procurement-Aided Unilateralism as a Paradigm of Foreign War*, UNIV. PENN. J. INT'L ECON. LAW (2008); *Can Appropriation Riders Speed Our Exit From Iraq*? 42 STAN. J. INT'L L. 291 (2006); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust-Era Victims*, 27 CLASS ACTION REP. 136 (2006); *Cancellation and Termination Without Forfeiture*, 54 MERCER L. REV. 1031 (2003). Member: District of Columbia Bar Association.

David W. Stanley, born St. Louis, Missouri, May 30, 1944. Admitted to the District of Columbia Bar, 1973; Virginia State Bar, 1972. Admitted to practice before the United States Supreme Court, 1980; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the District of Columbia, 1974. Education: University of Virginia (B.A., 1966); University of Virginia School of Law (J.D., 1972). Experience: Law clerk to Honorable Gerard D. Reilly, Chief Judge, District of Columbia Court of Appeals (1972-1973). Assistant U.S. Attorney, U.S. Attorney's Office for the District of Columbia, 1973-1984 (Fraud Division, 1981-1984); Assistant Chief Trial Attorney, Division of Enforcement, U.S. Securities and Exchange Commission (1984-1987); Of Counsel, Swidler & Berlin, Chartered (1987-1992). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section; Litigation Section); Assistant

U.S. Attorneys Association (President, 1994-1995); Association of Securities and Exchange Commission Alumni; The Barristers.

Bradford E. Kile. Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court, United States Court of Appeals for the Federal, Fourth, and DC Circuits, United States District Court for the District of Columbia and Eastern District of Virginia. Registered to practice before the United States Patent and Trademark Office – Reg. No. 25,223. Education: The Ohio State University (B. Mech. Engr., 1966); The George Washington University (J.D., 1970; LL.M. 1978). Publications: *Legal 'X-Games' Risk: Officer and Director Passive Retention of Personal Liability for Patent Infringement*, 7 IP Litigator 11 (2001); "Lotus v. Borland-Copyright Protection of Computer Software in a State of Transition," Copyright World, 1995. Member: American Bar Association; Fellow of the Inn – Giles S. Rich American Inn of Court; American Intellectual Property Law Association; Federal Circuit Historical Society.

EXHIBIT B

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

Firm Name: Cuneo Gilbert & LaDuca, LLP

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jonathan W. Cuneo (P)											0.20				0.20	$950	$190.00
Daniel Cohen (P)								1.00			3.50	7.00			11.50	$695	$7,992.50
Katie Van Dyck								1.80			0.30	1.50			3.60	$725	$2,610.00
															0.00	$0	$0.00
															0.00	$0	$0.00
															0.00	$0	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.80**	**0.00**	**0.00**	**4.00**	**8.50**	**0.00**	**0.00**	**15.30**		**$10,792.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.80**	**0.00**	**0.00**	**4.00**	**8.50**	**0.00**	**0.00**	**15.30**		**$10,792.50**

EXHIBIT C

Lithium Ion Batteries
Cuneo Gilbert LaDuca, LLP
March 1, 2017 - March 26, 2019

Timekeeper	Date	Task Code	Description	Historic Rates	Time
Jonathan Cuneo	4/21/2017	11	Email with Demetrius Lambrinos	$895	0.10
Jonathan Cuneo	4/21/2017	11	Teleconference with Robert McGranahan re: [redacted]	$895	0.10
Daniel Cohen	5/5/2017	8	Talk to client concerning [redacted]	$695	1.00
Katie Van Dyck	5/21/2017	8	Correspond with J. Cuneo regarding [redacted]	$650	0.50
Daniel Cohen	5/22/2017	11	email to client	$695	0.50
Katie Van Dyck	5/22/2017	8	Correspond with lead counsel regarding [redacted]	$650	0.20
Katie Van Dyck	5/22/2017	8	Prepare declaration for M. Bryant in support of service award application	$650	0.30
Katie Van Dyck	5/22/2017	8	Correspond with client regarding [redacted]	$650	0.20
Daniel Cohen	5/23/2017	11	Follow up with client Pat McGuiness and email	$695	0.50
Daniel Cohen	5/24/2017	11	follow up emails with Pat McGuiness	$695	0.50
Katie Van Dyck	5/24/2017	8	Review class representative correspondence from lead counsel	$650	0.10
Katie Van Dyck	5/24/2017	8	Discuss lead counsel correspondence with M. Bryant	$650	0.20
Katie Van Dyck	5/24/2017	8	Correspond with lead counsel regarding service awards for P. McGuinness	$650	0.10
Katie Van Dyck	5/24/2017	8	Teleconference with lead counsel and client regarding [redacted]	$650	0.20
Daniel Cohen	5/25/2017	11	follow up with Pat McGuiness and emails	$695	0.50
Katie Van Dyck	6/25/2018	11	Correspond with M. Bryant regarding [redacted]	$675	0.20
Daniel Cohen	6/26/2018	12	conference with Fl client concerning [redacted]	$695	1.00
Katie Van Dyck	6/27/2018	11	Correspond with J. Cuneo regarding [redacted]	$675	0.10
Katie Van Dyck	7/23/2018	12	Review lead counsel communication regarding [redacted]	$675	0.10

Lithium Ion Batteries

Cuneo Gilbert LaDuca, LLP

March 1, 2017 - March 26, 2019

Timekeeper	Date	Task Code	Description	Historic Rates	Time
Katie Van Dyck	7/23/2018	12	Correspond with J. Cuneo regarding [redacted]	$675	0.10
Daniel Cohen	7/24/2018	11	Sent email to client and follow up	$695	0.50
Katie Van Dyck	7/26/2018	12	Teleconference with M. Bryant regarding [redacted]	$675	0.20
Katie Van Dyck	7/26/2018	12	Correspond with lead counsel regarding [redacted]	$675	0.10
Katie Van Dyck	11/16/2018	12	Review [redacted]	$675	0.10
Katie Van Dyck	11/16/2018	12	Correspond with lead counsel and J. Cuneo regarding [redacted]	$675	0.20
Katie Van Dyck	11/16/2018	12	Correspond with M. Bryant regarding [redacted]	$675	0.20
Daniel Cohen	11/16/2018	12	communication with client concerning [redacted]	$695	2.00
Katie Van Dyck	11/17/2018	12	Teleconference with M. Bryant regarding [redacted]	$675	0.50
Daniel Cohen	11/19/2018	12	contact with client concerning [redacted]	$695	2.00
Daniel Cohen	11/20/2018	11	follow up with client	$695	1.00
Daniel Cohen	11/26/2018	12	Confer with class rep [redacted]	$695	2.00
					15.30

Lithium Ion Batteries
Cuneo Gilbert LaDuca, LLP
March 1, 2017 - March 26, 2019

Billed Slip Value
$89.50
$89.50
$695.00
$325.00
$347.50
$130.00
$195.00
$130.00
$347.50
$347.50
$65.00
$130.00
$65.00
$130.00
$347.50
$135.00
$695.00
$67.50
$67.50

Lithium Ion Batteries

Cuneo Gilbert LaDuca, LLP

March 1, 2017 - March 26, 2019

Billed Slip Value
$67.50
$347.50
$135.00
$67.50
$67.50
$135.00
$135.00
$1,390.00
$337.50
$1,390.00
$695.00
$1,390.00
$10,556.50

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
CUNEO GILBERT & LADUCA, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	$48.82
Hearing Transcripts	
Investigation	
Lexis/Westlaw	$116.70
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	$60.03
Travel	$2,032.28
Miscellaneous	$82.70
TOTAL:	$52,340.53

EXHIBIT 21

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF KATHERINE VAN DYCK IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF CUNEO, GILBERT & LaDUCA, LLP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Katherine Van Dyck, declare:

1. I am a partner of Cuneo, Gilbert & LaDuca, LLP ("CGL"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Matt Bryant and Patrick McGuinness and as counsel for IPPs throughout the course of this litigation. The background and experience of CGL and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, CGL performed the following work: Research and preparation of various briefs and legal memoranda and assistance with discovery, including the preparation of class representative interrogatory responses, compilation of class representative documents responsive to requests for production, preparation for class representative depositions, coordination of lengthy forensic searches of class representative electronic devices, and review of documents produced by defendants.

5. Attached hereto as **Exhibit B** is a billing summary of CGL's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by CGL during this period of time was 381.20, with a corresponding lodestar based on current rates of $226,436.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by CGL.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses CGL has incurred during the couurse of this litigation. CGL expended a total of $52,392.03 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by CGL on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at Washington, District of Columbia.

/s/ Katherine Van Dyck

Katherine Van Dyck

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

CUNEO GILBERT & LADUCA, LLP

FIRM PROFILE

Civil Litigation in Federal and State Courts. General Commercial Practice. Antitrust, Civil Rights, Government Relations, Products Liability, Administrative, Securities, Labor, and Consumer law.

ATTORNEYS

Jonathan W. Cuneo, born New York, New York, September 10, 1952. Admitted to the District of Columbia Bar, 1977; New York Bar, 2006. Admitted to practice before the United States Supreme Court, 1994; United States Court of Appeals for the First Circuit, 2006; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Fourth Circuit, 2005; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2007; United States Court of Appeals for the Tenth Circuit, 2011; United States Court of Appeals for Eleventh Circuit, 2012; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the Eastern District of Michigan; United States District Court for the Eastern District of New York, 2006; United States District Court for the Southern District of New York, 2006; United States District Court for the Northern District of New York, 2002; United States District Court for the District of Columbia, 1978. Education: Columbia University (A.B., 1974); Cornell University (J.D., 1977). Experience: Law clerk to the Honorable Edward Tamm, United States Court of Appeals, District of Columbia Circuit (1977-1978); Attorney, Office of the General Counsel, Federal Trade Commission (1978-1981); Assistant Counsel and Counsel, Subcommittee on Monopolies and Commercial Law, House Committee on the Judiciary (1981-1986); General Counsel, Committee to Support the Antitrust Laws (1986 - 2004); Legislative Counsel, National Association of Shareholder and Consumer Attorneys (1988-2004); Legislative Counsel, National Coalition of Petroleum Retailers and Service Station Dealers of America (1988-1994). Activities: Arlington County Democratic Committee (1983-1987); Board Member, Juvenile Law Center (2009-); Board Member, American Antitrust Institute (1998 - 2009); Board Member, Violence Policy Center (1999 - 2009); Board Member, Appleseed Legal Foundation (1999-2005). Honors: Rated by Martindale-Hubbell as AV® Preeminent™; Listed in Marquis "Who's Who in America"; Dean's Board of Advisors, The George Washington University Law School (2012 – current); Finalist, 2006 Trial Lawyer of the Year, Trial Lawyers for Public Justice. Publications: *Judge Tamm and the Evolution of Administrative Law: The Art of Judging*, 74 GEORGETOWN L.J. 1595 (1986); *Pulling the Plug on Antitrust Law* (with Jerry Cohen), THE NATION (1987); *House Takes Up Cause of Discounters*, LEGAL TIMES, Vol X, No. 30 (1987); *Supreme Court's "Sharp" Ruling Means Higher Prices, Fewer Choices for Consumers*, MANHATTAN LAWYER (1988); Chapter, *Consumer Protection -- Federal Trade Commission*, CHANGING AMERICA: BLUEPRINTS FOR THE NEW ADMINISTRATION (edited by Mark Green) (1992); *Antitrust and Clinton: Changes on the Horizon*, THE CALIFORNIA LAWYER

(1993); *Action on Class Actions*, THE RECORDER (1997); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust Era Victims* (with Professor Charles Tiefer), 27 CLASS ACTION REPORTS 139 (2006); THE INTERNATIONAL HANDBOOK OF PRIVATE ENFORCEMENT OF COMPETITION LAW (with Albert A. Foer) (Edward Elgar Publishing Inc., 2010). *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine*, publication forthcoming (2013), publication forthcoming in George Washington Law Review. Guest Lecturer: Southwestern Law School, 1997 and 1998; numerous appearances in CLE programs in the United States and Canada; District of Columbia Judicial Conference (2007). Member: American Bar Association; District of Columbia Bar Association; American Association for Justice.

Pamela B. Gilbert, born New Brunswick, New Jersey, October 3, 1958. Admitted to the New York Bar, 1985 (inactive); District of Columbia Bar 1986. Admitted to practice in D.C. Education: Tufts University (B.A., *magna cum laude*, 1980); New York University (J.D., 1984). Experience: Consumer Program Director, United States Public Interest Research Group (1984-1989); Legislative Director, Executive Director, Public Citizen's Congress Watch (1990-1992; 1992-1994); Attorney, M+R Strategic Services (1995); Executive Director, Consumer Product Safety Commission (1996-2001); Chief Operating Officer, M+R Strategic Services (2001-2002). Honors and Activities: Board Member, American Antitrust Institute (2010 -); Board Member, Center for Effective Government (2009 -); Board Member, National Environmental Law Center (2006 -); Board Member, Equal Justice Works (2004 - 2012). Publications: PRIVATE ENFORCEMENT OF THE ANTITRUST LAWS IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz), "Proposals for Reform," written with Victoria Romanenko. Member: New York Bar Association; District of Columbia Bar Association; American Bar Association; American Association for Justice; Public Justice; Consumer Attorneys of California.

Charles J. LaDuca, born Buffalo, New York, September 30, 1974. Admitted to the New York State Bar, 2001; District of Columbia Bar, 2002; United States Supreme Court, 2009; United States Court of Appeals for the Second Circuit, 2007; United States Court of Appeals for the Third Circuit, 2004; United States Court of Appeals for the Sixth Circuit, 2012; United States Court of Appeals for the Ninth Circuit, 2011; United States Court of Appeals for the District of Columbia Circuit, 2013; United States District Court for the Northern District of New York, 2002; United States District Court for the Western District of New York, 2004; United States District Court for the Southern District of New York, 2013; United States District Court for the District of Columbia, 2002; United States District Court for the Central District of Illinois, 2009; United States District Court for the District of Colorado, 2008; United States District Court for the Western District of Michigan, 2010. Education: George Washington University (B.A., 1996); Catholic University of America (J.D., 2000). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section); New York State Bar Association; New York State Society.

Joel Davidow, born Trenton, New Jersey, July 24, 1938. Admitted to the Bar in the District of Columbia, 1965; New York Bar, 1981; Court Admissions: U.S. Supreme Court, U.S. Court of Appeals (D.C., Ninth, First and Federal Circuits), U.S. District Court, S.D. N.Y., U.S. District Court, E.D. N.Y. Education: Columbia University School of Law (LLB, *cum laude*, 1963); Princeton University, Woodrow Wilson School of Public Affairs (B.A., *summa cum laude*, 1960). Experience: Notes editor of the Columbia Law Review and the winner of the National Jessup Moot Court

Competition; Two years in the U.S. Federal Trade Commission; Fifteen years in Antitrust Division of the Department of Justice, where he eventually served as Chief of the Foreign Commerce Section and then Director of Policy and Planning; Senior antitrust partner in major New York City and Washington, D.C. law firms, representing clients from Japan, Europe, and the United States, as both plaintiffs and defendants, in antitrust, patent, and trade litigation matters; Counsel of record in numerous antitrust class actions and has briefed and argued multi-million dollar appeals before the First, Second, Seventh, Ninth and Federal Circuit courts of appeal. Publications: ANTITRUST GUIDE FOR INTERNATIONAL BUSINESS ACTIVITIES (BNA, 4th ed. 2011); PATENT-RELATED MISCONDUCT ISSUES IN U.S. LITIGATION (OUP, 2010); and numerous articles dealing with international antitrust and patent litigation topics. Adjunct Professor: George Washington University School of Law, Columbia Law School, Georgetown Law Center, American University Law School, and George Mason University Law School, where he has taught courses in antitrust, regulation, and international competition policy.

Daniel M. Cohen, born Detroit, Michigan, January 24, 1958. Admitted to the Florida Bar, 1989; District of Columbia Bar, 2001; Maryland State Bar, 2003; Virginia State Bar, 2010. Admitted to practice before the United States District Court for Maryland, 2002; United States District Court for the Middle District of Florida, 2003; United States District Court of District of Columbia, 2008; Eastern District of Virginia, 2010; Western District of Virginia, 2010; Southern District of Florida, 2013. Education: Ithaca College (B.A., 1981); Wes tern New England School of Law (J.D., 1988). Experience: Criminal Defense Trial Attorney, Public Defenders Office, tried 70 jury trials, Jacksonville Florida, 1989-1999. Member: District of Columbia Bar Association (Antitrust and Consumer Law Section); Florida State Bar Association.

Michael J. Flannery, born January 22, 1963. Admitted to the Virginia Bar, 1991; District of Columbia Bar, 1992; California Bar, 1998; Missouri Bar, 2001. Admitted to practice before the United States Court of Appeals for the Third Circuit; United States Court of Appeals for the Ninth Circuit; United States District Court for the Eastern District of Missouri, United States District Court for the Western District of Missouri, United States District Court for the Southern District of Illinois, United States District Court for the Northern District of Illinois, United States District Court for the Northern District of California, United States District Court for the Southern District of California, United States District Court for the Central District of California, United States District Court for the Eastern District of California, and the United States District Court for the District of Columbia. Education: University of Notre Dame (B.A., 1985); College of William and Mary Marshall-Wythe School of Law (J.D., 1991). Honors and Awards: William and Mary Law Review (1989-91); Publication of Student Note: "Abridged Too Far: Anticipatory Search Warrants and the Fourth Amendment," 32 WM. & MARY L. REV. 781 (1991) (reprinted in 14 Criminal Law Review (1992)); Teaching Assistant, William and Mary Legal Skills Program; Chief Justice, William and Mary Honor Council; Notre Dame Scholar/Edward W. Krause Academic Scholarship. Experience: Cohen, Milstein, Hausfeld & Toll, Washington, DC, 1994-1997; Milberg Weiss Bershad Hynes & Lerach, San Diego, CA, 1997-2000; Carey, Danis & Lowe, St. Louis, MO, 2000-2012.

Matthew E. Miller, born Queens, New York, May 16, 1966. Admitted to the Bar of the Commonwealth of Massachusetts, 1992; Louisiana Bar, 1993; District of Columbia Bar, 1994. Admitted to practice before the United States Courts of Appeals for the First Circuit, 1998, Fourth

Circuit, 2010, Ninth Circuit, 2010, Tenth Circuit, 2011, D.C. Circuit, 2012; United States District Court for the District of Massachusetts, 1994; United States District Court for the District of the District of Columbia, 2008. Education: Tufts University (B.A., *magna cum laude*, 1988); University of Virginia (J.D., 1991). Experience: Law Clerk to the Honorable Edith Brown Clement, United States District Court for the District of Louisiana, 1991-1993; Berman, DeValerio & Pease, Boston, MA 1994-1999; sole practitioner, 1999-2008. Languages: French, Spanish.

Alexandra C. Warren, born Bucharest, Romania, October 9, 1977. Admitted to the New York Bar, 2003; Massachusetts Bar, 2003; Pennsylvania Bar, 2004; District of Columbia Bar, 2007. Admitted to practice before the United States District Court for the Eastern District of Pennsylvania, 2005; United States District Court for the Western District of Pennsylvania, 2007; United States District Court for the District of Columbia, 2007; United States District Court for the District of Colorado, 2008; United States District Court for the Middle District of Pennsylvania, 2009; United States District Court for the Western District of Michigan, 2010; United States District Court for the District of Massachusetts, 2012; United States Court of Appeals for the Third Circuit, 2009; United States Court of Appeals for the Fifth Circuit, 2009; United States Court of Appeals for the Ninth Circuit, 2011; United States Supreme Court, 2009. Education: Brandeis University (B.A., *cum laude*, 1999); Fordham University Law School (J.D., 2002) (Fordham Environmental Law Journal, Staff). Honors: Archibald R. Murray Public Service Award (2002); Addison M. Metcalf Labor Law Prize (2002). Experience: Law Clerk to the Honorable John E. Jones III, United States District Court for the Middle District of Pennsylvania (2002-2004); Associate, MacElree Harvey, Ltd. (2004-2006). Member: District of Columbia Bar Association; Philadelphia Trial Lawyers Association.

William H. Anderson, born Trenton, New Jersey, March 28, 1979. Admitted to the Pennsylvania Bar, 2004; District of Columbia Bar, 2007; United States District Court for the District of Columbia 2007; United States Court of Appeals for the District of Columbia Circuit 2009; Colorado Bar, 2013; United States District Court for the District of Colorado 2013 . Education: The George Washington University (B.A., *cum laude*, 2000); American University (J.D., 2004). Honors and Awards: Super Lawyers DC Rising Star 2014 & 2015. Experience: Law clerk to the Honorable Rhonda Reid Winston, Superior Court, District of Columbia (2004-2005). Member: American Bar Association; District of Columbia Bar Association; Pennsylvania Bar Association; Public Justice Foundation. Languages: Spanish and English.

Katherine W. Van Dyck, born Corpus Christi, Texas, July 4, 1979. Admitted to the Texas Bar, 2004; District of Columbia Bar, 2008. Admitted to practice before the United States District Court for the Northern District of Texas, 2006; United States District Court for the District of Columbia, 2008; United States Court of Appeals for the Fourth Circuit, 2009. Education: Texas Christian University (B.A. 2001); Texas Tech University Law School (J.D., 2004). Texas Tech Law Review - Articles Editor, Outstanding Third Year Editor, Outstanding Second Year Editor (2002-2004) Experience: Law clerk to the Honorable Hayden W. Head, Jr., United States District Court for the Southern District of Texas (2004-2006); Associate, Fee, Smith, Sharp & Vitullo, LLP (2006-2007); Associate, Griffith & Wheat, LLP (2008-2012).

Jennifer E. Kelly, born Elmira, New York, July 7, 1975. Admitted to the Maryland Bar, 2007, District of Columbia Bar, 2008, U.S. District Court for the District of Columbia, 2012. Education:

Boston University (B.A., *cum laude*, 1997), American University (J.D., *cum laude*, 2007; highest grade designation, Wills, Trusts, & Estates). Experience: Internship, Parliament of Great Britain (1995); Internship, District of Columbia Corporation Counsel (1996); Legislative Assistant, Office of Senator Robert C. Byrd (1998-2002); American University Civil Practice Clinic (Oral Argument before the Maryland Court of Special Appeals and Maryland District Court Small Claims Trial) (2006); Associate, Bracewell & Giuliani, LLP (2007-2009) (Paralegal, 2003-2007); Volunteer Attorney, American Red Cross (2010-2011). Member: American Bar Association.

Brendan S. Thompson, born Buffalo, New York, February 21, 1974. Admitted to the Maryland Bar, 2008; Admitted to practice before the United States District Court for the District of Colorado, 2008; United States District Court for the Central District of Illinois, 2008; United States Court of Appeals for the Ninth Circuit, 2011. Education: University of Detroit (B.S., 1997); visiting student, George Mason Law School; University of Baltimore Law School (J.D., 2008). Experience: Student Internships: Congressman Brian Higgins (D-NY) (2007); Chambers of the Honorable LeRoy F. Millett Jr., Circuit Court for the 31st Judicial Circuit of Virginia (2006); The Commonwealth's Attorney's Office for Prince William County, Virginia (2005). Member: Maryland State Bar Association, Bar Association of Baltimore City, American Bar Association; New York State Society.

Victoria O. Romanenko, born Kiev, Ukraine, April 8, 1983. Admitted to the Maryland Bar, 2009; the District of Columbia Bar, 2012. Education: Catholic University, Columbus School of Law (J.D., 2009); Brandeis University (B.A., with honors, 2006). Experience: Worked at a Washington D.C. firm engaging in antitrust and telecommunications litigation (2009-2011). Law Clerk at U.S. International Trade Commission (2009) (antidumping, countervailing duties, Section 337). Law Clerk at Department of Labor (2008) (Occupation Safety and Health Division). Law Clerk at District of Columbia Office of the Attorney General (2007) (Civil Enforcement Section). Ms. Romanenko was also nominated for the 2009 Jan Jancin award upon her completion of law school. This nomination is given to the student with the highest Intellectual Property GPA in the graduating class. Publications: *Remediation and Deterrence: The Real Requirements of the Vindication Doctrine* (2013), publication forthcoming in George Washington Law Review; PRIVATE ENFORCEMENT OF THE ANTITRUST LAW IN THE UNITED STATES (edited by Albert A. Foer and Randy M. Stutz) (2012), Chapter, *Proposals for Reform*, co-authored with Pamela Gilbert. Ms. Romanenko has a working knowledge of Russian and French.

Beatrice O. Yakubu, born Melbourne, Florida, January 3, 1984. Admitted to the Maryland Bar, 2010. Education: American University, Washington College of Law (J.D. 2010); Florida State University (B.S. 2005). Experience: clerked at the United States Attorney's Office and a criminal defense firm, and worked as a Student Attorney for the Mid-Atlantic Innocence Project. Ms. Yakubu is conversational in the Yoruba language.

Yifei Li, born Wuhan, China, February 15, 1988. Admitted to the New York State Bar, 2013; United States Court of Appeals for the Second Circuit, 2013; United States Court of Appeals for the District of Columbia Circuit, 2013; United States Court of Federal Claims, 2013; United States District Court for the Eastern District of Michigan, 2013; United States District Court for the Eastern District of New York, 2013; United States District Court for the Southern District of New York, 2013. Education: The George Washington University Law School (LL.M., 2011); Beijing Foreign Studies

University Law School (LL.B., B.A., Scholarship Recipient, 2010). Experience: Judicial Intern to the Honorable Chief Judge Randall R. Rader at U.S. Court of Appeals for the Federal Circuit (2012-2013). Legal Intern at Federal Circuit Bar Association (2011-2012). Law Clerk at Jingtian & Gongcheng Attorneys At Law (2009). Judicial Intern at People's Court of Jiang'An District (2007). Member: New York State Bar Association; American Bar Association. Ms. Li is a native speaker of Chinese (Mandarin).

Peter Gil-Montllor, born Manhasset, New York, October 11, 1987. Admitted to the New York Bar, 2014. Admitted to practice before the United States District Court for the Eastern District of New York, 2015; United States District Court for the Southern District of New York, 2015. Education: Georgetown University (J.D., magna cum laude, 2013); University of Chicago (A.B., with honors, 2009). Experience: Law clerk to the Honorable Allyne R. Ross, United States District Court for the Eastern District of New York (2015-2016). Member: Federal Bar Council. Mr. Gil-Montllor is a native speaker of Spanish.

Matthew T. Prewitt, born Oakland, California, August 6, 1986. Admitted to the California Bar, 2013. Education: University of Michigan Law School (J.D., cum laude, 2013); Brown University (A.B., economics, 2008). Experience: Law clerk to the Honorable Thomas P. Griesa, United States District Court for the Southern District of New York (2014-2015); Associate, Orrick Herrington & Sutcliffe LLP (2013-2014). Member: American Bar Association. Mr. Prewitt is conversational in German.

SPECIAL COUNSEL

Robert J. Cynkar, born Chicago, Illinois, April 22, 1952. Admitted to the Illinois Bar, 1977; District of Columbia Bar, 1978; Virginia Bar, 1984. Admitted to practice before the United States Supreme Court and before the United States Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Eighth, Eleventh, District of Columbia Circuit, and Federal Circuits. Education: Princeton University (A.B., *magna cum laude*, 1974); New York University School of Law (J.D., 1977) (Staff, Law Review). Experience: Associate, Fried, Frank, Harris, Shriver & Kampelman, Washington, D.C. (1977-1979); Counsel to Chairman Bob Dole, Subcommittee on Improvements in Judicial Machinery, United States Senate Committee on the Judiciary (1979-1981); General Counsel to Chairman Paul Laxalt, Subcommittee on Regulatory Reform, United States Senate Committee on the Judiciary (1981-1983); Assistant United States Attorney, Eastern District of Virginia (Criminal Division) (1983-1985); Special Assistant to Attorney General Edwin Meese (1985); Deputy Assistant Attorney General, Civil Division, United States Department of Justice (1985-1988); Associate, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1988-1991); Partner, Shaw, Pittman, Potts & Trowbridge, Washington, D.C. (1991-1996); Founding Partner, Cooper & Kirk, Washington, D.C. (1996-2003); Partner, Egan, Fitzpatrick, Malsch & Cynkar, Vienna, Virginia (2004-2006); has tried over 25 cases in federal and state courts; has briefed numerous appeals in the majority of Federal Circuits and in State Supreme Courts, and in the U. S. Supreme Court, and personally argued many of those appeals. Sample Noteworthy Cases: *U.S. v. Fleming* (E.D.Va. 1984) (successful prosecution of a drunk driver who killed a mother of 11 for second-degree murder); *U.S. v. Winstar* (U.S. Sup. Ct. 1996) (holding that even the requirements of a broad change in regulatory policy by Congress cannot excuse the federal government's breach of contract); *U.S. ex*

rel. Ubl v. IIF Data Solutions (E.D. Va. 2009) (successful defense of a government contractor accused of violating the False Claims Act in a bet-the-company case); *Livingston v. Virginia Dept. of Transportation* (Va. Sup. Ct. 2012) (establishing that a damaging for public use does not need to rise to the level of a taking to qualify for just compensation under the Virginia Constitution); *Settle v. RGR*, (Prince William Cir. Ct. 2012)(over $3 million jury award for the widow of a truck driver killed in a collision with a train). Publications: *Dumping on Federalism*, 75 U. COLO. L. REV. 1261 (2004); *The Changing Vocabulary of Administrative Law*, 43 FOOD DRUG COSM. L.J. 681 (1988); "*Buck v. Bell*: *'Felt Necessities' v. Fundamental Values?*" 81 COLUM. L. REV. 1418 (1981). Member: District of Columbia Bar Association; Virginia Bar Association; Fairfax County Bar Association; Federalist Society.

OF COUNSEL TO THE FIRM

Charles Tiefer, born January 21, 1954. Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court; United States Court of Federal Claims. Education: Columbia University (B.A., *summa cum laude*, 1974), Harvard Law School (J.D., *magna cum laude*, 1977) (Member, Harvard Law Review). Experience: Law clerk, United States Court of Appeals for the D.C. Circuit (1977-1978); Trial Attorney, United States Department of Justice, Civil Rights Division (1978-1979); Assistant Senate Legal Counsel, United States Senate (1979-1984); Solicitor and Deputy General Counsel, United States House of Representatives (1984-1995); Professor of Law, University of Baltimore School of Law (1995 -). Publications: VEERING RIGHT: HOW THE BUSH ADMINISTRATION SUBVERTS THE LAW FOR CONSERVATIVE CAUSES (U. Cal. Berkeley, 2004); GOVERNMENT CONTRACT LAW: CASES AND MATERIALS (co-author) (Carolina Academic Press, 2d ed., 2004); THE SEMI-SOVEREIGN PRESIDENCY (Westview, 1994); CONGRESSIONAL PRACTICE AND PROCEDURE (Greenwood Press, 1989); *Congress's Transformative "Republican Revolution" in 2001-2006 and the Future of One-Party Rule*, J. L. & POL. OF U. VA. (2008); *The Iran Debacle: The Rise and Fall of Procurement-Aided Unilateralism as a Paradigm of Foreign War*, UNIV. PENN. J. INT'L ECON. LAW (2008); *Can Appropriation Riders Speed Our Exit From Iraq*? 42 STAN. J. INT'L L. 291 (2006); *The Gold Train Case: Successfully Suing the United States on Behalf of a Class of Holocaust-Era Victims*, 27 CLASS ACTION REP. 136 (2006); *Cancellation and Termination Without Forfeiture*, 54 MERCER L. REV. 1031 (2003). Member: District of Columbia Bar Association.

David W. Stanley, born St. Louis, Missouri, May 30, 1944. Admitted to the District of Columbia Bar, 1973; Virginia State Bar, 1972. Admitted to practice before the United States Supreme Court, 1980; United States Court of Appeals for the District of Columbia Circuit, 1978; United States District Court for the District of Columbia, 1974. Education: University of Virginia (B.A., 1966); University of Virginia School of Law (J.D., 1972). Experience: Law clerk to Honorable Gerard D. Reilly, Chief Judge, District of Columbia Court of Appeals (1972-1973). Assistant U.S. Attorney, U.S. Attorney's Office for the District of Columbia, 1973-1984 (Fraud Division, 1981-1984); Assistant Chief Trial Attorney, Division of Enforcement, U.S. Securities and Exchange Commission (1984-1987); Of Counsel, Swidler & Berlin, Chartered (1987-1992). Member: District of Columbia Bar Association (Corporation, Finance and Securities Law Section; Litigation Section); Assistant U.S. Attorneys Association (President, 1994-1995); Association of Securities and Exchange Commission Alumni; The Barristers.

Bradford E. Kile. Admitted to the District of Columbia Bar. Admitted to practice before the United States Supreme Court, United States Court of Appeals for the Federal, Fourth, and DC Circuits, United States District Court for the District of Columbia and Eastern District of Virginia. Registered to practice before the United States Patent and Trademark Office – Reg. No. 25,223. Education: The Ohio State University (B. Mech. Engr., 1966); The George Washington University (J.D., 1970; LL.M. 1978). Publications: *Legal 'X-Games' Risk: Officer and Director Passive Retention of Personal Liability for Patent Infringement*, 7 IP Litigator 11 (2001); "Lotus v. Borland-Copyright Protection of Computer Software in a State of Transition," Copyright World, 1995. Member: American Bar Association; Fellow of the Inn – Giles S. Rich American Inn of Court; American Intellectual Property Law Association; Federal Circuit Historical Society.

EXHIBIT B

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT

TIME REPORT- MONTHLY

Firm Name: Cuneo Gilbert & LaDuca, LLP

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

Categories:

(1) Investigations, Factual
(2) Drafting Discovery Requests
(3) Drafting Discovery
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Jonathan Cuneo (P)			12.00					7.00			25.80	0.50			45.30	$895	$40,543.50	45.30	$40,543.50
Pamela Gilbert (P)											0.50				0.50	$575	$287.50	0.50	$287.50
Joel Davidow (P)				10.50				13.50			7.50				31.50	$895	$28,192.50	31.50	$28,192.50
Matthew Miller (P)	6.50														6.50	$775	$5,037.50	6.50	$5,037.50
Sandra Cuneo (P)								3.30			1.70				5.00	$725	$3,625.00	5.00	$3,625.00
							37.00								37.00	$350	$12,950.00	37.00	$12,950.00
Daniel Cohen (P)			4.50	14.00				7.00	2.50		44.00	12.00			84.00	$695	$58,380.00	84.00	$58,380.00
							88.00								88.00	$350	$30,800.00	88.00	$30,800.00
William Anderson (P)											1.00				1.00	$650	$650.00	1.00	$650.00
Katherine Van Dyck (P)	2.50	6.60			1.80				18.70		5.30	1.30			36.20	$650	$23,530.00	36.20	$23,530.00
Jennifer Kelly (P)					0.10	0.50		2.50			10.30				13.40	$575	$7,705.00	13.40	$7,705.00
Evelyn Li (P)											0.30				0.30	$550	$165.00	0.30	$165.00
Julie Sorenson (A)							27.00								27.00	$500	$13,500.00	27.00	$13,500.00
SUB-TOTAL	**9.00**	**6.60**	**16.50**	**24.50**	**1.90**	**0.50**	**152.00**	**33.30**	**21.20**	**0.00**	**96.40**	**13.80**	**0.00**	**0.00**	**375.70**		**$225,366.00**	**375.70**	**225,366.00**

NON-ATTORNEYS

Daniel Howick (PL)											4.30				4.30	$200	$860.00	4.30	$860.00
Nadia Belkin (PL)	0.20														0.20	$175	$35.00	0.20	$35.00
Marie Schenk (PL)								0.70			0.30				1.00	$175	$175.00	1.00	$175.00
SUB-TOTAL	**0.20**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.70**	**0.00**	**0.00**	**4.60**	**0.00**	**0.00**	**0.00**	**5.50**		**$1,070.00**	**5.50**	**$1,070.00**
GRAND TOTAL:	**9.20**	**6.60**	**16.50**	**24.50**	**1.90**	**0.50**	**152.00**	**34.00**	**21.20**	**0.00**	**101.00**	**13.80**	**0.00**	**0.00**	**381.20**	**$0.00**	**$226,436.00**	**381.20**	**$226,436.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

CUNEO GILBERT & LADUCA, LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Jonathan Cuneo	October 2015	$895
	September 2013	$850
	June 2013	$800
Pamela Gilbert	June 1,2013	$575
Joel Davidow	March 2014	$895
	January 2014	$825
	November 2013	$800
	September 2013	$775
	June 2013	$750
Matthew Miller	July 2015	$775
	January 2014	$750
	September 2013	$700
Sandra Cuneo	January 2014	$725
	September 2013	$675
	June 2013	$625
Daniel Cohen	November 2013	$695
	June 2013	$650
William Anderson	September 2015	$650
	January 2014	$575
	November 2013	$550
	June 2013	$500
Katherine Van Dyck	September 2015	$650
	November 2013	$550
	June 2013	$525
Jennifer Kelly	September 2015	$575
	July 2015	$500
	January 2014	$475
	June 2013	$450

Evelyn Li	March 2016	$550
	July 2015	$500
	March 2014	$425
	June 2013	$325
Julie Sorenson	September 2015	$500
	July 2015	$375
	August 2014	$350
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Daniel Howick	June 1, 2013 – February 28, 2017	$200
Nadia Belkin	June 1, 2013 – February 28, 2017	$175
Marie Schenk	June 1, 2013 – February 28, 2017	$175

EXHIBIT D

(REDACTED)

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
6/5/2013	11	Daniel Howick	Worked with Katie to prepare cover sheet, summons, etc.	2.00
6/14/2013	11	Katie Van Dyck	Update calendar with new deadlines	0.30
6/17/2013	11	Sandra Cuneo	Telcons JWC (3x), S. Williams, CPM, re: Le CA plaintiff update	0.20
6/17/2013	11	Daniel Howick	Emailed SameDay and Katie regarding affidavits of service, etc.	1.50
6/17/2013	8	Katie Van Dyck	Review returned summonses to ensure compliance with service deadlines (3.0); correspond with clerk's office to correct address on docket (0.5)	3.50
6/20/2013	11	Daniel Howick	Follow up with SameDay regarding affidavits	0.80
6/24/2013	8	Katie Van Dyck	Review scheduling order and order regarding code of conduct	0.20
6/27/2013	8	Katie Van Dyck	Review order granting Berman motion to seal (0.1); prepare correspondence to litigation team regarding same (0.2)	0.30
6/28/2013	11	Sandra Cuneo	Emails & telcon to/from J Verducci re CGL lead plaintiffs; email CGL attys re same; emails JWC, S Williams re reasons for confidentiality agreement; email [redacted] re same	1.00
6/28/2013	8	Katie Van Dyck	Review correspondence from J. Verducci and S. Williams regarding draft consolidated complaint	0.20
6/29/2013	11	Joel Davidow	e-mails re: P.O.	0.50
6/29/2013	8	Katie Van Dyck	Review protective order; prepare correspondence to M. Bryant regarding same	0.50
6/30/2013	8	Katie Van Dyck	[redacted]	0.30
7/1/2013	8	Katie Van Dyck	[redacted]; correspond with J. Verducci regarding draft consolidated complaint (0.1); discuss strategy with litigation team (0.1); review draft complaint (1.2)	1.50
7/1/2013	11	Jonathan Cuneo	Emails and telcons with [redacted] and Katie Van Dyke	1.00
7/1/2013	11	Sandra Cuneo	Follow-up with CGL attorneys re named plaintiff acknowledgements (also on 6/30) (0.3); emails JWC, J. Verducci re named plaintiffs acknowledgements (0.2)	0.50
7/2/2013	8	Daniel Cohen	Review complaint and emails to [redacted]	1.50
7/2/2013	11	Joel Davidow	E-mails re: [redacted]; review of complaint	1.50
7/2/2013	8	Katie Van Dyck	Correspond with M. Bryant regarding draft complaint (0.2); correspond with J. Verducci regarding all firm clients' approval of consolidated complaint (0.3)	0.50
7/3/2013	8	Daniel Cohen	Review complaint and follow up with [redacted]	1.00
7/8/2013	8	Katie Van Dyck	Review day's filings	0.20
7/10/2013	11	Jonathan Cuneo	Meeting with MI client [redacted]	1.50
7/10/2013	8	Katie Van Dyck	Review order granting application for appointment to plaintiffs' steering committee; correspond with J. Cuneo regarding same	0.30

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
7/11/2013	11	Daniel Cohen	Conference with [redacted] client, review complaint and update	1.50
7/26/2013	8	Katie Van Dyck	Prepare correspondence to [redacted] regarding unsealing of consolidated complaint	0.20
7/29/2013	11	Katie Van Dyck	Correspond with M. Bryant regarding implications of lawsuit on mortgage application; review Sanyo information	0.30
8/19/2013	1	Matthew E. Miller	Legal research re discoverability of plaintiff's finances (2.0); exchanged emails w/JD, DB, JWC (2.0); Discussed defs' discovery issues w/JD (2.0)	6.00
9/5/2013	8	Katie Van Dyck	Update calendar with motion to dismiss briefing schedule	0.20
9/16/2013	8	Joel Davidow	Respond to Defendant's MTD	1.00
9/16/2013	8	Katie Van Dyck	Retrieve motions to dismiss filed by Defendants	0.30
1/21/2014	11	Katie Van Dyck	Correspond with S. Cuneo and J. Cuneo regarding upcoming status conference	0.30
1/27/2014	8	Joel Davidow	Review of MTD outline	1.00
2/12/2014	11	Katie Van Dyck	Review correspondence from lead counsel regarding 7 project (0.1); discuss same with J. Cuneo (0.1)	0.20
2/13/2014	11	Katie Van Dyck	Correspond with J. Cuneo regarding 7 project	0.30
2/14/2014	11	Jonathan Cuneo	Return from Detroit .	1.80
2/16/2014	8	Sandra Cuneo	Check CGL N. D. Cal complaints re MA Gen Law 93A claims at request of Lieff Cabraser (.4); respond to email query from LC re same (.4)	0.80
2/26/2014	8	Sandra Cuneo	Review protective order & sign & return acknowledgement; review indirect purchaser consolidated amended complaint; order re motions to dismiss; issue outline	2.50
2/27/2014	11	Evelyn Li	discussion & emails with Sandra re possible doc review project next month	0.30
3/4/2014	7	Sandra Cuneo	Review dox in SWC folder Sanyo 00011 (4.3); telcon R Spiegal re same (0.2)	4.50
3/6/2014	7	Sandra Cuneo	Review dox in SWC Sanyo folder 00011 (2.0); telcon R Spiegal for clarification of coding issues (0.2); recode 27 already-coded dox (1.8)	4.00
3/7/2014	11	Katie Van Dyck	Review stipulation dismissing Florida claims (0.3); prepare correspondence to D. Cohen and J. Cuneo regarding dismissal of Florida claims (0.2)	0.50
3/7/2014	7	Sandra Cuneo	Review dox in SWC Sanyo Folder 00011	4.00
3/8/2014	7	Sandra Cuneo	Review dox in SWC Sanyo Folder 00011	0.50
3/10/2014	7	Sandra Cuneo	Review & code SWC folder Sanyo 00011	0.50
3/11/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011 (4.7); email Lieff firm for summary of missed call yesterday (0.3)	5.00
3/12/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011	3.70
3/13/2014	7	Sandra Cuneo	Review & code SWC Sanyo dox, Folder 00011 (0.7); problems with Catalyst speed (0.3); begin review of Toshiba America folder 004 (0.7)	1.70
3/14/2014	7	Sandra Cuneo	Review & code SWC Toshiba America Folder 004 dox	1.30

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
3/18/2014	7	Sandra Cuneo	10,00 Review & code dox in Toshiba American folder 004; emails Lieff & Berman re possibly interesting dox.	4.80
3/19/2014	7	Sandra Cuneo	Review & code dox in Toshiba America Folders 004, 005	4.00
3/20/2014	7	Sandra Cuneo	Review & code Toshiba America Folder 005	3.00
4/4/2014	8	Marie Schenk	final draft of Flannery notice of appearance (0.2); final draft of Sandra Cuneo withdrawal of appearance (0.2); draft of Danny Cohen notice of appearance(0.3)	0.70
5/2/2014	11	Jennifer Kelly	Communications with J Davidow regarding memorandum about joint and several liability in a conspiracy.	0.30
5/2/2014	8	Katie Van Dyck	Review correspondence from lead counsel regarding MTD opposition drafting assignment	0.10
5/2/2014	8	Joel Davidow	Review LGCAL MTD	1.00
5/3/2014	8	Joel Davidow	revisions to 12(b)(6) MTD	1.00
5/5/2014	11	Jennifer Kelly	Draft, review and revise memorandum regarding conspirator liability.	2.70
5/6/2014	8	Joel Davidow	review LG Cal MTD	2.50
5/6/2014	1	Matthew E. Miller	TC w/JD re litigation strategy (0.2); legal research re liability for acts of co-conspirator that precede joining conspiracy (0.2), emailed to JD, KVD (0.1)	0.50
5/6/2014	11	Jennifer Kelly	Draft, review and revise memorandum regarding conspirator liability.	2.50
5/7/2014	8	Jennifer Kelly	Communications with J Davidow regarding research for reply to LG CChem America, Inc. motion to dismiss (0.7). Legal research regarding discovery standards before class period and LGCAI background (0.7) . Research regarding permissible discovery (0.6). Research regarding business activities of LGCAI and draft paragraph regarding same (0.5).	2.50
5/7/2014	8	Joel Davidow	Replies to LG MTD	2.50
5/8/2014	11	Jennifer Kelly	Communications regarding research [redacted]	0.30
5/9/2014	11	Jennifer Kelly	Research and writing regarding [redacted] in the 9th Circuit. Pull cases and summarize.	0.20
5/12/2014	11	Jennifer Kelly	Research and writing regarding [redacted] in the 9th Circuit (0.75). Review pulled cases and summarize same (0.75)	1.50
5/12/2014	8	Katie Van Dyck	Begin preparing draft opposition to LGCAI motion to dismiss at request of lead counsel (1.2); correspond with co-counsel regarding same (0.1)	1.30
5/12/2014	8	Joel Davidow	reply to LGA MTD	3.00
5/13/2014	11	Jennifer Kelly	Research and writing regarding [redacted] in the 9th Circuit (1.4). Review pulled cases and summarize same (1.4)	2.80

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
5/13/2014	8	Katie Van Dyck	Conduct research and continue preparing draft opposition to LGCAI motion to dismiss	4.70
5/14/2014	11	Jonathan Cuneo	Review KVD draft	2.00
5/14/2014	8	Katie Van Dyck	Research and continue revising LGCAI opposition	3.80
5/23/2014	11	Katie Van Dyck	Correspond with lead counsel regarding 7	0.20
6/4/2014	11	Jonathan Cuneo	Travel to Michigan to meet with [redacted]	3.00
6/4/2014	8	Daniel Cohen	Review complaint and research coding protocol	2.50
6/9/2014	7	Daniel Cohen	Research for 7 from Sanyo English Folder. Custodian Takanan Mastsumoto	3.00
6/12/2014	7	Daniel Cohen	7 from Sanyo English Folder. Custodian Takanan Mastsumoto	3.00
7/1/2014	11	Daniel Cohen	Start review set up browser and conference call	5.00
7/2/2014	7	Daniel Cohen	7 from Stack.	4.00
7/3/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	2.00
7/7/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.50
7/8/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.00
7/9/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	3.00
7/10/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	4.00
7/11/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Takanan Mastsumoto	3.00
7/12/2014	11	Jonathan Cuneo	Travel to and meet with SWC	1.00
7/15/2014	7	Daniel Cohen	7 Custodian Takanan Mastsumoto	4.00
7/16/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/17/2014	7	Daniel Cohen	Document from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/18/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	2.00
7/21/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	5.00
7/22/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	6.00
7/23/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	3.00
7/24/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.00
7/25/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	5.00
7/28/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
7/29/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	3.50
7/30/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
7/31/2014	7	Daniel Cohen	7 from Sanyo English Folder Custodian Ali Pourfalh	4.50
8/1/2014	7	Daniel Cohen	Train Julie and 7 from Sanyo English Folder Custodian Ali Pourfalh	3.50
8/14/2014	7	Julie Sorenson	Catalyst training/phone conference/etc. Bates: ACBC006167	5.00
8/15/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000008163 - SEL-DOJE-000008259	3.30
8/18/2014	7	Julie Sorenson	7 Bates #:SEL-DOJE-000008418 - SEL-DOJE-000009890	7.00
8/19/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000009892 - SEL-DOJE-000010773	7.00

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
8/20/2014	7	Julie Sorenson	7 Bates #: SEL-DOJE-000010746 - SEL-DOJE-000011404	4.00
8/28/2014	7	Julie Sorenson	7 : SEL-DOJE-000011387 - SEL-DOJE-000011475	0.70
9/17/2014	11	Katie Van Dyck	[redacted]	0.30
10/1/2014	11	Katie Van Dyck	Correspond with J. Cuneo regarding client questionnaire	0.30
10/2/2014	11	Katie Van Dyck	Coordinate completion of client questionnaires (0.2); prepare correspondence to client and litigation team regarding same (0.2)	0.40
10/2/2014	11	Joel Davidow	Discovery letter to [redacted]	1.00
10/3/2014	11	Katie Van Dyck	Review and revise client questionnaire (0.6); correspond with client regarding same (0.2)	0.80
10/6/2014	11	Katie Van Dyck	Revise M. Bryan client questionnaire (0.3); correspond with client regarding questionnaire (0.2)	0.50
10/6/2014	11	Katie Van Dyck	Correspond with J. Cuneo, D. Cohen, and J. Davidow regarding [redacted]	0.20
10/6/2014	11	Daniel Cohen	Review case conference [redacted]	3.00
10/8/2014	11	Katie Van Dyck	Correspond with D. Cohen regarding McGuinness declaration	0.20
10/8/2014	11	Daniel Cohen	Review cases and development and conference with [redacted] on update and status	2.00
10/9/2014	11	Katie Van Dyck	Correspond with D. Cohen and lead counsel regarding [redacted]	0.30
10/9/2014	8	Daniel Cohen	Follow with our [redacted] amended complaint and review pleadings.	1.50
10/10/2014	11	Daniel Cohen	Conference with our [redacted] and research amended complaint	1.00
10/10/2014	11	Katie Van Dyck	Correspond with lead counsel regarding [redacted] declaration	0.20
10/13/2014	11	Daniel Cohen	Conference with [redacted] on case and updates	1.50
11/20/2014	11	Daniel Cohen	[redacted] research.	1.00
3/9/2015	11	Daniel Cohen	[redacted]	1.00
4/24/2015	11	Joel Davidow	[redacted]	0.50
4/24/2015	6	Jennifer Kelly	Review communications regarding beginning plaintiffs discovery.	0.20
4/24/2015	11	Daniel Cohen	Follow up with [redacted] on upcoming ROG testimony	1.50
4/26/2015	6	Jennifer Kelly	Review communications regarding beginning plaintiffs discovery.	0.30
4/26/2015	8	Katie Van Dyck	Correspond with V. Romanenko regarding clients' interrogatory responses	0.30
4/27/2015	11	Joel Davidow	calls [redacted] and D. Lambrinos	0.50
4/27/2015	11	Jonathan Cuneo	prepare for and attend interview with [redacted]	2.00
4/27/2015	6	Katie Van Dyck	Correspond with D. Lambrinos and [redacted] regarding discovery responses	0.20
4/28/2015	11	Daniel Cohen	Conference call with [redacted] concerning ROG responses with California	2.50
4/29/2015	11	Daniel Cohen	Follow up with [redacted] on ROG responses	1.50

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
4/30/2015	11	Daniel Cohen	Last follow up concerning responses and go over receipts	1.50
5/4/2015	6	Katie Van Dyck	Teleconference with D. Lambrinos and [redacted] regarding discovery responses	0.50
5/8/2015	11	Daniel Cohen	Review [redacted] final ROG responses and send on	1.50
5/11/2015	6	Katie Van Dyck	Prepare correspondence to [redacted] regarding draft interrogatory responses	0.30
5/19/2015	6	Katie Van Dyck	Review [redacted] revisions to interrogatory responses (0.3); correspond with D. Lambrinos regarding same (0.2)	0.50
6/18/2015	11	Jonathan Cuneo	e-mails and telcons re: 7 (.5); telcon with Lieff Cabraser (.5)	1.00
9/15/2015	11	Joel Davidow	review of Kiwak deposition ruling	0.50
9/22/2015	11	Jonathan Cuneo	emails with CPM and Sklaver re McGranahan. T with [redacted]	1.50
9/25/2015	11	Joel Davidow	e-mails re: changed name for [redacted].	1.00
9/28/2015	6	Katie Van Dyck	Teleconference with [redacted] regarding discovery responses	0.50
9/29/2015	6	Katie Van Dyck	Prepare [redacted] discovery responses (0.40); correspond with client and D. Lambrinos regarding [redacted] discovery responses (0.10)	0.50
9/30/2015	11	Marie Schenk	sending retainer agreement for signature on behalf of [redacted] instead of [redacted]	0.30
9/30/2015	11	Joel Davidow	new retention of [redacted] assoc.	1.00
11/4/2015	11	Jonathan Cuneo	telcons and e-mails re: deposition of [redacted]	1.00
11/11/2015	6	Jonathan Cuneo	Travel to and from Detroit (6). Prepare for [redacted] deposition (3). Follow up calls and emails re document production (3)	12.00
11/12/2015	11	Jonathan Cuneo	telcons and e-mails with co-counsel and [redacted] re: deposition	2.00
11/20/2015	11	William Anderson	Review correspondence (2). Prepare and send correspondence (.3). Draft and revise discovery response. (.5)	1.00
11/20/2015	11	Jonathan Cuneo	telcons with William Anderson re: supplemental response interrogatories	1.00
12/1/2015	11	Jonathan Cuneo	review filings from [redacted] declaration; telcon with [redacted]	1.00
12/2/2015	11	Jonathan Cuneo	e-mails and correspondence with [redacted]	0.50
12/15/2015	8	Joel Davidow	draft [redacted], dismissal issues	1.00
12/24/2015	8	Joel Davidow	review of pleadings re: [redacted]	0.50
1/15/2016	6	Katie Van Dyck	Correspond with [redacted] and M. Caylao regarding verification for second set of interrogatories	0.50
1/21/2016	5	Daniel Cohen	Conference with California and [redacted] concerning upcoming deposition and [redacted] declaration	1.50
1/27/2016	5	Daniel Cohen	Conference with [redacted] and California on upcoming depositions	1.50

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
1/29/2016	5	Daniel Cohen	Follow up with [redacted] and [redacted] concerning upcoming depositions.	0.50
2/1/2016	5	Joel Davidow	analyzing [redacted] Assoc. deposition transcript	1.50
2/3/2016	5	Daniel Cohen	Conference with [redacted] and [redacted] concerning upcoming depositions.	1.00
2/5/2016	5	Joel Davidow	emails re: [redacted] depo	2.00
2/6/2016	5	Joel Davidow	emails re: [redacted] depos	1.50
2/7/2016	5	Joel Davidow	Prep for [redacted] deposition	1.00
2/8/2016	6	Katie Van Dyck	Correspond with lead counsel and [redacted] regarding protective order and outstanding discovery	0.20
2/9/2016	8	Katie Van Dyck	Provide lead counsel with protective order declaration executed by [redacted]	0.30
2/12/2016	5	Daniel Cohen	Follow up with [redacted] and [redacted] concerning upcoming depositions and review verifications	1.00
2/22/2016	5	Daniel Cohen	calls with [redacted] and [redacted] for upcoming prep for depositions review discovery responses.	1.50
2/23/2016	5	Daniel Cohen	Participate on phone prepping [redacted] for his deposition and review materials beforehand.	4.00
2/29/2016	6	Katie Van Dyck	[redacted]	0.20
2/29/2016	6	Katie Van Dyck	[redacted]	0.30
3/6/2016	11	Jonathan Cuneo	[redacted]	0.50
3/7/2016	8	Jonathan Cuneo	review [redacted] transcript	3.00
3/7/2016	5	Daniel Cohen	Review [redacted] deposition and conference call with Pat.	1.50
3/9/2016	8	Jonathan Cuneo	Review [redacted] testimony (1.5); [redacted] (1.5)	3.00
3/10/2016	6	Katie Van Dyck	Prepare correspondence to client [redacted] requesting verification of responses to requests for production	0.20
3/10/2016	5	Joel Davidow	Prep for [redacted]	1.00
3/11/2016	6	Daniel Cohen	follow up with [redacted] on discovery issues and affidavit conference call with Attorneys in California	1.50
3/11/2016	6	Katie Van Dyck	Correspond with lead counsel and client [redacted] regarding verifications for discovery responses	0.30
3/12/2016	5	Joel Davidow	Prep for [redacted] dep	2.00
3/13/2016	5	Joel Davidow	Prep for [redacted]. deposition on scheduling	1.50
3/14/2016	6	Katie Van Dyck	Correspond with lead counsel regarding verifications for [redacted] discovery responses	0.20
3/14/2016	6	Katie Van Dyck	Teleconference with [redacted] regarding verifications and responses to requests for production	0.50
3/14/2016	11	Daniel Cohen	talk with [redacted] on Verification review and send to California.	1.00
3/14/2016	11	Joel Davidow	meeting w/Plaintiff (.5); meeting w/co-counsel (.5)	1.00
3/14/2016	1	Nadia N. Belkin	Searching for [redacted] for Joel	0.20
3/14/2016	5	Jennifer Kelly	Call with J Davidow regarding preparing witness [redacted] for his deposition and send docs regarding same.	0.10

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
3/15/2016	11	Jonathan Cuneo	prepare for and meet with [redacted]	2.00
3/17/2016	6	Katie Van Dyck	Correspond with lead counsel and client [redacted] regarding scheduling of meeting to prepare for deposition	0.50
3/18/2016	11	Daniel Cohen	Various calls concerning new discovery requests for computers.	1.50
3/18/2016	11	Jonathan Cuneo	review memo (.2); telcons with Katie and Danny (.3); telcons with Demeritus (.3); emails with Demeritus (.2)	1.00
3/19/2016	6	Katie Van Dyck	Teleconference with J. Cuneo and D. Cohen regarding request to remotely search Plaintiffs' computers	0.30
3/20/2016	8	Jonathan Cuneo	prepare responses with respect to computer search demand from Cotchett office	1.00
3/21/2016	1	Katie Van Dyck	Teleconference with [redacted] regarding proposed remote computer search	0.50
3/21/2016	1	Katie Van Dyck	Correspond with lead counsel regarding proposed remote computer search	0.30
3/21/2016	6	Katie Van Dyck	Correspond with lead counsel and plaintiff [redacted] regarding scheduling of deposition preparation session	0.20
3/21/2016	5	Daniel Cohen	Follow up with [redacted], review deposition and conference with Jon C.	1.50
3/21/2016	11	Jonathan Cuneo	prepare for and attend conference call with Steve Williams and Emeritus (5); multiple calls with [redacted] (5); telcons with Katie (5); response to Cotchett demand for computer search of clients (5).	2.00
3/21/2016	11	Pamela Gilbert	Meet with Jon Cuneo to discuss privacy issues	0.50
3/22/2016	11	Daniel Cohen	various conference calls concerning discovery issues and call with [redacted] and research.	2.00
3/22/2016	1	Katie Van Dyck	Teleconference with lead counsel, J. Cuneo, and D. Cohen regarding proposed remote computer search	0.50
3/23/2016	1	Katie Van Dyck	Teleconference with client regarding proposed computer search	0.50
3/24/2016	1	Katie Van Dyck	Correspond with [redacted] regarding scheduling of computer search with vendor	0.20
4/4/2016	11	Daniel Cohen	Conference with [redacted] and gather material for computer search on Tuesday.	1.00
4/4/2016	1	Katie Van Dyck	Correspond with D. Lambrinos, [redacted] and D. Cohen regarding computer search	0.50
4/5/2016	11	Daniel Cohen	Stay on conference call while expert goes over our clients computer remotely.	5.00
4/6/2016	11	Daniel Cohen	Follow up with [redacted] material, conference call with California and prepare for call tomorrow	2.00
4/7/2016	11	Daniel Cohen	Conference call and computer check for [redacted]	4.00
4/8/2016	6	Daniel Cohen	follow up with discovery issues from [redacted]	2.00
4/8/2016	6	Katie Van Dyck	Correspond with [redacted] regarding computer search and latest discovery responses	0.30

Lithium Ion Batteries Time Detail
Cuneo Gilbert LaDuca,LLP

EXHIBIT D

Date	Task Code	Timekeeper	Description	Time
4/12/2016	5	Katie Van Dyck	Correspond with lead counsel regarding scheduling of deposition preparation session with [redacted]	0.30
4/12/2016	6	Katie Van Dyck	Correspond with [redacted] regarding scheduling of deposition preparation session	0.20
4/14/2016	5	Katie Van Dyck	Assist in preparing [redacted] for upcoming deposition	1.00
4/19/2016	6	Katie Van Dyck	Correspond with lead counsel regarding [redacted] interrogatory response and verification	0.20
4/20/2016	5	Katie Van Dyck	Correspond with lead counsel regarding outcome of [redacted] deposition	0.30
4/26/2016	5	Katie Van Dyck	[redacted]	0.20
7/1/2016	11	Daniel Cohen	Follow up with [redacted] concerning discovery issues and review receipts	1.50
7/5/2016	11	Daniel Cohen	follow up with client and conference with lead attorneys	1.50
7/19/2016	6	Daniel Cohen	follow up with discovery issues from [redacted]	1.00
11/18/2016	8	Daniel Cohen	[redacted]	1.00
11/21/2016	12	Daniel Cohen	[redacted]	2.00
11/22/2016	12	Daniel Cohen	[redacted]	1.00
11/28/2016	12	Katie Van Dyck	[redacted]	0.30
11/28/2016	12	Katie Van Dyck	[redacted]	0.20
11/28/2016	12	Jonathan Cuneo	[redacted]	0.30
11/28/2016	12	Daniel Cohen	[redacted]	2.00
11/29/2016	12	Daniel Cohen	[redacted]	1.00
11/30/2016	12	Jonathan Cuneo	[redacted]	0.20
12/16/2016	12	Daniel Cohen	[redacted]	2.00
12/20/2016	12	Katie Van Dyck	[redacted]	0.30
12/20/2016	12	Daniel Cohen	[redacted]	2.00
1/4/2017	12	Katie Van Dyck	[redacted]	0.20
1/4/2017	12	Daniel Cohen	[redacted]	2.00
1/5/2017	8	Daniel Cohen	Call with [redacted] review pleadings and call with LA	2.00
1/6/2017	12	Katie Van Dyck	Correspond with lead counsel and [redacted] regarding NEC settlement	0.30
			TOTAL	381.20

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
Cuneo Gilbert & LaDuca, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	$48.82
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	$168.20
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	$60.03
Travel	$2,032.28
Miscellaneous - Pacer	$82.70
TOTAL:	$52,392.03

EXHIBIT 22

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JOHN G. EMERSON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF EMERSON SCOTT, LLP**

I, John G. Emerson, declare:

1. I am a Partner of Emerson Scott, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Plaintiff Robert S. Harmon / A-1 Computers and as counsel for IPPs throughout the course of this litigation. The background and experience of Emerson Scott, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Emerson Scott, LLP performed the following work: at the direction of Lead Counsel on behalf of the Arkansas Plaintiff, Bob Harmon and his business A-1 Computers, we prepared A-1 Computers and Bob Harmon's claims. This work involved meetings with the plaintiff A-1 Computers/Bob Harmon on numerous occasions, preparation of client questionnaires, preparation of discovery responses including interrogatories and production responses, document preservation matters, identifying and determining what batteries purchased were pertinent to plaintiff's claims, preparation of plaintiff declarations and verifications, worked with our Arizona client Thomas Tuohy concerning his batteries and claims, and coordinated with numerous lawyers including lawyers and paralegals in Lead Counsel's offices concerning all of the above.

5. Attached hereto as **Exhibit B** is a billing summary of Emerson Scott, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment

of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Emerson Scott, LLP during this period of time was 74.70, with a corresponding lodestar based on current rates of $53,523.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Emerson Scott, LLP.

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

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

8. Emerson Scott, LLP expended a total of $0 in unreimbursed costs and expenses in connection with the prosecution of this case and is not seeking any reimbursement of costs and expenses.

9. I have reviewed the time and expenses reported by Emerson Scott, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on 24th day of May, 2017 at Little Rock, Arkansas.

/s/ John G. Emerson

John G. Emerson

ATTESTATION

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

By: */s/ Steven N. Williams*
Steven N. Williams

EXHIBIT A

Emerson Scott, LLP

Attorneys at Law

Little Rock
Houston

Class Action Litigation
Antitrust Litigation
Securities Litigation
ERISA Litigation
Consumer Litigation
Trials and Appeals
Personal Injury and Wrongful Death
Criminal Defense
Martindale-Hubble AV Rated

Our Firm

Emerson Scott, LLP ("ES") has a national class action legal practice with offices in Houston, Texas, and Little Rock, Arkansas.

The Firm and its team of experienced attorneys and paralegals, handles complex commercial litigation with a concentration on cases that involve violations of federal antitrust statutes, violations of federal and state consumer protection laws, securities laws, and violations of the Employee Retirement Income Security Act of 1974 ("ERISA"). ES has prosecuted numerous antitrust class action cases, consumer class action cases, securities fraud, and shareholder derivative cases representing consumers, damaged companies, and investors around the country and abroad. ES and its predecessor firms have been active in many class action and individual cases of note. In the class action litigation area, ES and its predecessor firm have represented plaintiffs in well over 100 class action or other complex litigation cases.

In antitrust, ES is currently a member of the Plaintiffs' Counsel Steering Committee in the *Aluminum Warehousing Antitrust Litigation* representing first level purchasers in this Multi-District Litigation ("MDL"), 13 MDL 2481 (KBF), which was pending in the Southern District of New York and is currently on appeal in the U.S. Court of Appeals for the 2nd Circuit. ES has represented plaintiffs in the *Compact Disc Antitrust Litigation* filed against the music industry in

the United States, and plaintiffs in the *High Pressure Laminates Antitrust Litigation* in the direct purchaser case. ES has been or is currently involved in the following antitrust cases: *Lithium Ion Batteries Antitrust Litigation, CRT (Cathode Ray Tube) Antitrust Litigation, Flash Memory Antitrust Litigation, GPU (Graphics Processing Units) Antitrust Litigation, Ocean Shipping Antitrust Litigation, TFT-LCD (Flat Panel) Antitrust Litigation, Trans-Pacific Airline Surcharge Litigation, Domestic Airlines Antitrust, Liquid Aluminum Sulfate Antitrust Litigation,* and *Bridgestone Anti-Vibration Rubber Parts Antitrust Litigation,* among other cases.

In privacy and data breach, ES is actively involved prosecuting cases for aggrieved consumers in the following pending MDL cases: *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation,* (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation,* MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; *In re: Experian Data Breach Litigation* (C.D.CA.) MDL No. 2676 in which nearly half of the named plaintiffs in the consolidated amended complaint are clients of ES, and *In re: Vizio, Inc., Consumer Privacy Litigation* (C.D.CA.). ES is also actively involved in prosecuting two data breach cases in Arizona, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

In other consumer protection cases, ES currently represents numerous corn farmers in the United States in consolidated actions in the MDL *In re: Syngenta AG MIR162 Corn* Litigation (MDL 2591) pending before Judge John W. Lungstrum in the District of Kansas. In September, 2016, this case was certified as a national class and eight states had classes certified including the state of Arkansas where ES represents the designated Arkansas bellwether trial plaintiff and many other Arkansas corn farmers. John Emerson of Emerson Scott was a leader in the MDL baby bottle action captioned *In Re: Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation* in the United States District Court for the Western District of Missouri. John Emerson of Emerson Scott was Co-Lead Counsel in the *Webb et al. v. Carters Inc. et al.* class action litigation in the United States District Court for the Central District of California concerning Carter's line of tag-less baby clothing; in the *Montanez et al. v. Gerber Childrenswear, Inc., et al.* class action litigation in the United States District Court for the Central District of California concerning Gerber's line of tag-less baby clothing.

ES's predecessor firm served as Co-Lead Counsel in several MDL cases involving product liability and consumer protection issues. In 2004, Emerson Scott's predecessor firm was appointed by the Honorable Stephen P. Friot as Plaintiffs' Co-Lead Counsel in *In re: Farmers Insurance Co., Inc. FCRA Litigation,* which was settled in the Western District of Oklahoma. This case was litigated on behalf of a certified class of Farmer's current and past customers who were charged

more than the lowest premium for insurance based upon information in a consumer report, and received certain "adverse action" notices that willfully failed to conform to the Fair Credit Reporting Act. The case resolved in late 2011 and provided class members with about $100 million in cash and other relief. ES's predecessor firm represented numerous long-grain rice farmers in Arkansas and other states, in the MDL action *In re: Genetically Modified Rice Litigation* (the "*Rice MDL Action*"). The *Rice MDL Action* sought damages for long-grain rice producers in Arkansas, Missouri, Mississippi, Louisiana, and Texas for defendants' contamination of the United States' rice supply with genetically modified rice as revealed by Bayer and the USDA in August 2006. This MDL action was settled for over $750 million in cash relief for American rice farmers. ES's predecessor served as Co-Lead Plaintiffs' Counsel in an MDL case transferred to the Honorable Richard D. Bennett of the District of Maryland captioned *In Re: Tyson Foods, Inc. Chicken Raised Without Antibiotics Consumer Litigation*. The case involved false advertising claims associated with the sale of Tyson Foods' chicken as being raised without antibiotics, when in fact the chicken was raised with antibiotics. The action was settled for $5 million in cash and other relief for class members who purchased the chicken products at issue.

The Firm has been active in prosecuting cases seeking to improve corporate governance in public companies through its involvement in shareholder derivative litigation. Most notably, John Emerson, served as Co-Lead Counsel in cases resulting in significant and far-reaching corporate governance and compliance improvements within companies such as AOL/Time Warner, Computer Associates, Nicor, Cryolife, Inc., and Crompton (Chemtura). The Firm has also represented shareholders in claims involving corporate buyouts and other change-of-control transactions.

Finally, John Emerson of ES served on the *Enron ERISA Litigation* Plaintiffs' Counsel Steering Committee. This case settled in the United States District Court, Southern District of Texas, Houston Division in 2005.

Our Attorneys

John G. Emerson **Partner**



Mr. Emerson is a founding partner of ES. He was born in Little Rock, Arkansas, and was raised there and in Houston, Texas. He is a member of the state bars of Texas, Washington and Arkansas. Mr. Emerson obtained his Bachelor of Arts from the University of Texas at Austin and then earned his Juris Doctorate from South Texas College of Law Houston. Mr. Emerson has been rated "AV Preeminent" for the last 18 years by Martindale-Hubbell. This is the highest possible peer review rating in legal ability and ethical standards. Mr. Emerson was honored by being named one of the Top 100 Trial Lawyers in America by the National Trial Lawyers in 2013 -2016.

In his antitrust practice, Mr. Emerson is currently a member of the Plaintiffs' Counsel Steering Committee in the *Aluminum Warehousing Antitrust Litigation* representing first level purchasers in this MDL, 13 MDL2481 (KBF), which was pending in the Southern District of New York and is currently on appeal in the U.S. Court of Appeals for the 2nd Circuit. Mr. Emerson has represented plaintiffs in the *Compact Disc Antitrust Litigation* filed against the music industry in the United States, and plaintiffs in the *High Pressure Laminates Antitrust Litigation* in the direct purchaser case. Notably, Mr. Emerson also has been or is currently involved in the following antitrust cases: *Lithium Ion Batteries Antitrust Litigation, CRT (Cathode Ray Tube) Antitrust Litigation, Flash Memory Antitrust Litigation, GPU (Graphics Processing Units) Antitrust Litigation, Ocean Shipping Antitrust Litigation, TFT-LCD (Flat Panel) Antitrust Litigation, Trans-Pacific Airline Surcharge Litigation, Domestic Airlines Antitrust Litigation, Liquid Aluminum Sulfate Antitrust Litigation*, and the *Bridgestone Anti-Vibration Rubber Parts Antitrust Litigation* case, among others.

In his privacy and data breach practice, Mr. Emerson is actively involved prosecuting cases for aggrieved consumers in the following pending MDL cases: *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation*, (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation*, MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; *In re: Experian Data Breach Litigation* (C.D.CA.) MDL No.

2676, and *In re: Vizio, Inc., Consumer Privacy Litigation* (C.D.CA.). He is also actively involved in prosecuting two Arizona data breach cases, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

In his consumer class action practice, Mr. Emerson represents numerous corn farmers in the United States in consolidated actions in the MDL *In re: Syngenta AG MIR162 Corn* Litigation (MDL 2591) pending before Judge John W. Lungstrum in the District of Kansas. On September 11, 2016 the Court denied defendant's motion to dismiss in major part. On September, 26, 2016 this case was certified as a national class and eight states had classes certified including the state of Arkansas where Mr. Emerson represents the designated Arkansas bellwether trial plaintiff as well as many other Arkansas corn producers. This case is currently set for trial on June 5, 2017. Currently, he also is prosecuting cases involving food products allegedly contaminated with the synthetic chemical glyphosate such as a case against General Mills involving Nature Valley snack bars and a case against Sioux Honey Association Cooperative involving honey products. Finally, Mr. Emerson is currently representing policyholders in cases against Transamerica and Lincoln Life concerning increased cost of insurance rates and/or increased monthly deductions. Mr. Emerson served as Chairman of the Expert Witness Committee in the consolidated MDL action styled *In Re: Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation* filed in the United States District Court for the Western District of Missouri. Mr. Emerson represented one of the named lead plaintiffs in the *AOL Version 5.0 Software Litigation*. He was Co-Lead Counsel in an action filed against the Farmers Insurance Group of Companies involving alleged violations of the Fair Credit Reporting Act which resolved for plaintiffs. He was Co-Lead Counsel for a number of parents in the Gerber's baby clothing litigation and the Carter's baby clothing litigation. Both cases resolved for plaintiffs in 2013. Mr. Emerson was a consultant to Canadian plaintiffs' counsel in the Canadian *Medtronic Pacemaker Pacing Lead Product Liability Litigation* that was certified and settled in British Columbia as a Canadian national class action. He has been a consultant to Canadian counsel in the Canadian *Compact Disc Antitrust Litigation*, the Canadian *Publishers Clearing House Litigation*, and the Canadian *AOL 5.0 Software Litigation*.

In his retirement plan practice, Mr. Emerson was appointed to the Plaintiffs' Counsel Steering Committee by Judge Melinda Harmon, United States District Judge, Southern District of Texas – Houston Division, in the consolidated Enron ERISA Litigation, styled *Pamela M. Tittle v. Enron Corp., et al.*

In his corporate practice, Mr. Emerson has represented numerous stockholders in shareholder derivative lawsuits brought against corporate boards alleging breaches of fiduciary duties. These suits sought to impose corporate governance reforms aimed at protecting

shareholders and eliminating corporate waste and abuse. In the past, Mr. Emerson served as one of the lead counsel in the Computer Associates shareholder derivative action in the Federal District Court for the Eastern District of New York. This action was brought against the Computer Associates' board of directors and led to the resignation of the Company's CFO, the resignation of two other senior financial officers, and the adoption of certain corporate governance measures that Computer Associates has since represented as the "gold standard" of governance reform. Mr. Emerson was Co-Lead Counsel in the case styled *In Re: Nicor, Inc. Shareholder Derivative Litigation* in the Circuit Court of Cook County, Illinois County Department, Chancery Division. This action was brought against Nicor's board of directors and its settlement resulted in major corporate governance improvements at Nicor. Mr. Emerson was Co-Lead Counsel in the case styled *In Re: Cryolife Derivative Litigation* pending in the Superior Court of Fulton County, Georgia. The settlement of this action resulted in wide-sweeping corporate governance improvements at Cryolife. Mr. Emerson was also Co-Lead Counsel in the case styled *In re: AOL Time Warner Shareholder Derivative Litigation* which was settled in the Federal District Court for the Southern District of New York. This settlement resulted in wide ranging corporate governance and compliance changes and was recognized as a substantial factor in Time Warner's ability to obtain $200 million from its Directors' and Officers' (D&O) insurance carriers. Mr. Emerson was Lead Counsel in the action styled *In re: Crompton* (now known as Chemtura) *Shareholder Derivative Litigation* which settled with Crompton's D & O carrier, AIG, at JAMS in New York and was thereafter approved by the Bankruptcy Court for the Southern District of New York. This settlement resulted in major corporate governance improvements.

Mr. Emerson was admitted to the Texas Bar in 1980. He is admitted to practice before the U.S. Supreme Court; U.S. Court of Appeals for the 2nd, 5th, and 8th Circuits; U.S. District Courts for the Northern, Southern, Eastern, and Western Districts of Texas; Eastern and Western Districts of Arkansas; Western District of Washington; District of Colorado; Eastern District of Michigan; and all Texas, Washington, and Arkansas state courts.

Mr. Emerson has extensive jury trial experience over the past 36 years. He is a member of the legal fraternity Delta Theta Phi. He is also a member of The National Trial Lawyers; American Association for Justice ("AAJ"); AAJ Class Action Litigation Group; Fellow of The Pound Civil Justice Institute; Texas Trial Lawyers Association; American Bar Association (Tort and Insurance Practice and Legal Economics Sections); State Bar of Texas (Grievance Committee 4-D, Houston, 1991-94); Membership Services Committee, 1991-92); Sustaining Life Fellow Texas Bar Foundation; Bar Association for the United States District Court for the Eastern District of Texas; Houston Bar Association; Fellow of the Houston Bar Foundation; Washington State Bar; King

County Bar Association; Arkansas Trial Lawyers Association; Pulaski County Bar Association; and the Arkansas Bar Association. Mr. Emerson was honored by the Governor of Arkansas when he was named an Arkansas Traveler, an Ambassador of Good Will on behalf of the people of the state of Arkansas to people everywhere.

Mr. Emerson is married with two children, two grandsons, and five rescued dachshunds. He enjoys the outdoors and has hunted and fished in the United States, Canada, Mexico, Honduras, Uruguay, Argentina, Botswana, and South Africa. He is a member of Ducks Unlimited and is a life member of Safari Club International.

Mr. Emerson's email address is jemerson@emersonfirm.com.

David G. Scott **Partner**

Mr. Scott is a founding partner of Emerson Scott, LLP. He was born and raised in Warren, Arkansas. Mr. Scott received his Bachelor of Science degree in Business Administration, with a major in Finance, from the University of Arkansas at Fayetteville in 1982 and his Juris Doctorate from the William H. Bowen School of Law in Little Rock, Arkansas in 2006.

Mr. Scott received his Chartered Financial Analysts (CFA) designation from The Institute of Chartered Financial Analysts in 1993, charter number 18365. He was an institutional investments representative and manager prior to law school with Prudential-Bache Securities, Dean Witter Reynolds, Inc., and SouthWest Securities, Inc. While working in the field of institutional investments for eighteen years, Mr. Scott specialized in the areas of asset/liability management, portfolio immunization, and hedging in the financial futures markets and cash markets for large institutional clients such as banks, insurance companies, savings and loans, and mortgage bankers. He further specialized in the mortgage-backed securities and mortgage markets where he was involved in the development of the first collateralized mortgage obligation securities.

Mr. Scott has extensive experience in representation of clients in the personal injury, drug injury, medical malpractice, and complex litigation areas. Mr. Scott has worked and is working extensively in the MDL *In re: Syngenta AG MIR162 Corn* Litigation (MDL 2591) and the case, *In Re: Aluminum Warehousing Antirust Litigation*, (13 MDL 2481 (KBF)). He is also deeply involved in the representation of class action plaintiffs in numerous consumer protection and antitrust cases, including *In re: Anthem Healthcare Data Breach Litigation*, MDL No. 2617 (N.D. Cal.); *In re: Premera Healthcare Data Breach Litigation*, (D. OR.) MDL No. 2633; *In re: Medical Informatics Engineering Data Breach Litigation*, MDL No. 2667 (N.D. Ind.); *In re: Office of Personnel Management Data Breach Litigation* (D.D.C.) MDL No. 2664; and *In re: Experian*

Data Breach Litigation (C.D. Cal.) MDL No. 2676 as well as two data breach cases in Arizona, *In re: Banner Health Data Breach Litigation* and *In re: Valley Anesthesiology Data Breach Litigation*.

Mr. Scott has extensive criminal law experience as he was previously a Special Prosecutor for the State of Arkansas and successfully prosecuted to conviction over 1000 felony cases.

Mr. Scott was tendered and qualified as expert witness in the area of financial analysis and testified as to his opinion in the embezzlement case, *State v. Jean Leek*, CR 2010-4307, in the Fourth Division of Pulaski County, Arkansas Circuit Court. The defendant was convicted.

Mr. Scott is a member of the Bar of the State of Arkansas and is admitted to practice in the United States District Courts for the Eastern and Western Districts of Arkansas. He is also a member of the American Association of Justice, the Arkansas Trial Lawyers Association, the Arkansas Bar Association, American Association for Justice ("AAJ"), and the AAJ Class Action Litigation Group.

Mr. Scott's email address is dscott@emersonfirm.com

EXHIBIT B

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

Firm Name: EMERSON SCOTT, LLP **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
EMERSON, JOHN (P)								0.70			57.00				57.70	$795.00	$45,871.50
POYNTER, SCOTT (P)								0.20			0.50				0.70	$695.00	$486.50
CROWDER, WILL (P)											10.10				10.10	$550.00	$5,555.00
JENNINGS, CHRIS (SRA)	0.50							1.20							1.70	$550.00	$935.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.10**	**0.00**	**0.00**	**67.60**	**0.00**	**0.00**	**0.00**	**70.20**		**$52,848.00**
NON-ATTORNEYS																	
AUTRY, TANYA (PL)								2.20			1.70				3.90	$150.00	$585.00
GASTINEAU, CHARLIE (PL)	0.60														0.60	$150.00	$90.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.60**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2.20**	**0.00**	**0.00**	**1.70**	**0.00**	**0.00**	**0.00**	**4.50**		**$675.00**
GRAND TOTAL:	**1.10**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.30**	**0.00**	**0.00**	**69.30**	**0.00**	**0.00**	**0.00**	**74.70**		**$53,523.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

EMERSON SCOTT LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
EMERSON, JOHN (P)	INCEPTION TO CLOSE	$795.00
POYNTER, SCOTT (P)	INCEPTION TO CLOSE	$695.00
CROWDER, WILL (P)	INCEPTION TO CLOSE	$550.00
JENNINGS, CHRIS (SRA)	INCEPTION TO CLOSE	$550.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
AUTRY, TANYA (PL)	INCEPTION TO CLOSE	$150.00
GASTINEAU, CHARLIE (PL)	INCEPTION TO CLOSE	$150.00

EXHIBIT D

(REDACTED)

BATTERY ANTITRUST LITIGATION
REVISED/AMENDED TIME REPORT

For time due: - June 1, 2013 to February 28, 2017 ***REVISED-AMENDED 2017.05.23-TA***

BATTERY (A)

EMERSON SCOTT, LLP, 1301 SCOTT STREET, LITTLE ROCK, AR 72202 PHONE (501) 907-2555

Last Name, First Name	Category	Date of Service	Detailed Description of Work performed	Billing Rate	Time	Fees Total
Emerson, John	11	6/20/2013	Read Noss email re [redacted]	$795.00	0.10	$79.50
Emerson, John	11	6/20/2013	Coordination with [redacted]	$795.00	0.50	$397.50
Emerson, John	11	6/20/2013	Coordinate with Scott Poynter regarding [redacted].	$795.00	0.20	$159.00
Emerson, John	11	6/28/2013	Read Noss email re clients and email Noss re same.	$795.00	0.20	$159.00
Emerson, John	11	6/28/2013	Email Will Crowder re [redacted]	$795.00	0.10	$79.50
Emerson, John	11	6/28/2013	Coordinate by email with Verducci re draft consolidated amended complaint;	$795.00	0.50	$397.50
Emerson, John	11	7/1/2013	Coordinate via email with Noss re [redacted]	$795.00	0.20	$159.00
Emerson, John	11	7/1/2013	Emails to and from Will Crowder regarding Noss.	$795.00	0.20	$159.00
Emerson, John	8	7/2/2013	Read Chris Jennings email re draft consolidated amended complaint.	$795.00	0.20	$159.00
Emerson, John	8	7/2/2013	Review and make suggested edits to the draft consolidated amended complaint.	$795.00	0.50	$397.50
Emerson, John	11	7/2/2013	Email Chris Jennings [redacted] to Walter Noss	$795.00	0.10	$79.50
Emerson, John	11	10/3/2014	Read Scott Poynter email with attached A-1 Computers (Robert Harmon) Document Preservation, and another questionnaire for A-1; review attached documents	$795.00	1.20	$954.00
Emerson, John	11	10/3/2014	Coordination with Scott Poynter and Lasha Garcia re [redacted]	$795.00	0.80	$636.00
Emerson, John	11	10/3/2014	Coordination with Moore re camera batteries. Have Moore take picture of bateries and email to me. Receive and review pictures and info off of the batteries and email to co-counsel.	$795.00	1.00	$795.00
Emerson, John	11	10/6/2014	Coordination with Lasha Garcia re receipt of [redacted] and [redacted] & related docs and additional client items to come to her. Email all [redacted] materials to Lasha Garcia at Cotchett's office	$795.00	0.90	$715.50
Emerson, John	11	10/6/2014	Read [redacted] email re 17 products with batteries; email [redacted] re same; read [redacted] email with attachments;	$795.00	0.30	$238.50
Emerson, John	11	10/6/2014	Review 12 attachments from [redacted] with attached doc preservation and client questionnaire material; Coordination with [redacted] re doc preservation & questionnaire material.	$795.00	0.40	$318.00
Emerson, John	11	10/6/2014	Coordinate with Lasha Garcia re Preservation Declarations for [redacted]	$795.00	0.30	$238.50
Emerson, John	11	10/6/2014	Coordinatin with client [redacted] re the signed Document Preservation Declaration.	$795.00	0.30	$238.50
		10/6/2014	Coordination with [redacted] re her preservation documents;	$795.00	0.20	$159.00
Emerson, John	11	10/6/2014	Receive and review signed preservation of documents letter from [redacted]	$795.00	0.50	$397.50
Emerson, John	11	10/6/2014	Forward to counsel the signed preservation of documents letter from [redacted]	$795.00	0.10	$79.50
Emerson, John	11	10/6/2014	Coordination with Lasha Garcia with information and photos of batteries from our [redacted]	$795.00	0.40	$318.00
Emerson, John	11	10/6/2014	Conference with Charlie Gastineau re client retainers. Receive and review client retainers and forward same to co-counsel.	$795.00	0.10	$79.50
Emerson, John	11	10/7/2014	Coordinate with Will Crowder re [redacted] documents.	$795.00	0.40	$318.00
Emerson, John	11	10/7/2014	Receive and review [redacted] evidence documents.	$795.00	0.30	$238.50

BATTERY ANTITRUST LITIGATION
REVISED/AMENDED TIME REPORT

Emerson, John	11	10/7/2014	Send A-1 evidence documents to Jennie Anderson & coordinate with Jennie Anderson re these documents.	$795.00	0.10	$79.50
Emerson, John	11	10/8/2014	Coordinate with Jennie Anderson email re [redacted]	$795.00	0.20	$159.00
Emerson, John	11	10/8/2014	Read 2nd Jennie Anderson email re making changes/revisions to [redacted] Declaration.	$795.00	0.20	$159.00
Emerson, John	11	10/8/2014	Read Will Crowder email re making changes to [redacted] Declaration.	$795.00	0.10	$79.50
Emerson, John	11	10/8/2014	Revise/edit [redacted] Declaration.	$795.00	0.60	$477.00
Emerson, John	11	10/8/2014	Read and reply to Jennie Anderson email re Products 2 and 3 etc.;	$795.00	0.10	$79.50
Emerson, John	11	10/8/2014	Coordinate with client [redacted] re faxing the docs; email Tom re same;	$795.00	0.30	$238.50
Emerson, John	11	10/8/2014	Email Lasha re problems with [redacted] docs and coordination with Lasha re [redacted] documents.	$795.00	0.30	$238.50
Emerson, John	11	10/8/2014	Read Tanya Autry email with [redacted] doc; review revised [redacted] docs.	$795.00	0.40	$318.00
Emerson, John	11	10/8/2014	Email Lasha Garcia at Joe Cotchett's office the signed [redacted]; read Lasha email re same.	$795.00	0.20	$159.00
Emerson, John	11	10/8/2014	Read Tanya Autry email regarding Revised [redacted] Declaration.	$795.00	0.10	$79.50
Emerson, John	11	10/8/2014	Receive and review [redacted] fax with revised declaration info docs; email [redacted] re same.	$795.00	0.20	$159.00
Emerson, John	11	10/8/2014	Revise [redacted] Declaration and email same to Lasha Garcia & Jeannie Anderson	$795.00	0.60	$477.00
Emerson, John	11	10/17/2014	Read Jennie Anderson email re our client [redacted] with redline edits and clean version; review same.	$795.00	0.90	$715.50
Emerson, John	11	10/17/2014	Read Will Crowder email to Jennie re draft letter; read Jennie email re same.	$795.00	0.20	$159.00
Emerson, John	11	10/17/2014	read Will Crowder email re pdf of letter re ESI and review letter.	$795.00	0.20	$159.00
Emerson, John	11	10/17/2014	read Shana Scarlett email re correction to letter and make corrections to letter.	$795.00	0.30	$238.50
Emerson, John	11	10/17/2014	read Will Crowder email with corrected letter.	$795.00	0.10	$79.50
Emerson, John	11	11/4/2014	Coordination with Lasha at Cotchett re Verizon receipts from [redacted]	$795.00	0.30	$238.50
Emerson, John	11	2/7/2015	Telephone message to Arizona client [redacted] again regarding Verification form to be completed.	$795.00	0.10	$79.50
Emerson, John	11	2/7/2015	Call [redacted] and leave another VM re his calling me and getting the Verification back to me.	$795.00	0.10	$79.50
Emerson, John	11	4/28/2015	Coordinate with Jenny Anderson, Demetrious Lambrinos, and Jaclyn Verducci re the Master Grid, Document Checklist, the link to the folders, and defendants RFP's and Rogs to [redacted]	$795.00	1.00	$795.00
Emerson, John	11	4/29/2015	2 telephone conferences with Jenny Andersen re [redacted] issues.	$795.00	0.50	$397.50
Emerson, John	11	4/29/2015	telephone conference with client [redacted] computers re issues.	$795.00	0.30	$238.50
Emerson, John	11	5/1/2015	Read Demetrius email re talking at 9 AM this morning.	$795.00	0.10	$79.50
Emerson, John	11	5/1/2015	t/message to Demetrius at 9 AM; email Demetrius that I called, no answer.	$795.00	0.10	$79.50
Emerson, John	11	5/1/2015	t/conf with Demetrius re client discovery issues.	$795.00	0.50	$397.50
Emerson, John	11	5/1/2015	Email Jennie Anderson re my dealing directly with Demetrius; read Anderson email re same.	$795.00	0.20	$159.00
Emerson, John	11	5/1/2015	Review in-house file materials for answering Interrogs and RFP.	$795.00	0.70	$556.50
Emerson, John	11	5/1/2015	Read & reply to Demetrius email re defendants at issue.	$795.00	0.10	$79.50
Emerson, John	11	5/1/2015	read Demetrius email re corporate document checklist.	$795.00	0.10	$79.50
Emerson, John	11	5/1/2015	Coordinate with Demetrius Lambrinos, Michael Caylao, Jenny Anderson, and [redacted] re information (Rog Responses and Document Checklist) needed from Arkansas client [redacted] and [redacted] Computers.	$795.00	0.50	$397.50
Emerson, John	11	5/1/2015	coordinate with Tanya Autry re the photographs of [redacted] batteries and receipts.	$795.00	0.20	$159.00
Emerson, John	11	5/1/2015	Further coordination with Demetrius re physical possession of the batteries.	$795.00	0.30	$238.50

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Emerson, John		5/1/2015	Further coordination with Jenny Anderson re incorporating Harmon and A-1 information into the template for the Interrogatories and for the template for the RFP's.	$795.00	0.40	$318.00
Emerson, John	11	5/1/2015	Receive and review the photographs of Mr. Harmon's batteries and receipts.	$795.00	0.20	$159.00
Emerson, John	11	5/2/2015	Send Arkansas client Bob Harmon the interrogatories and request for production of documents with instructions. Tel conf with Bob Harmon re questions re roggs and Monday's deadline for same.	$795.00	0.50	$397.50
Emerson, John	11	5/2/2015	Send message to Jenny Anderson and Demetrius regarding the Monday deadline and read message from Jenny re same.	$795.00	0.10	$79.50
Emerson, John	11	5/3/2015	Coordinate with Demetrius via email re conference call tomorrow morning.	$795.00	0.20	$159.00
Emerson, John	11	5/4/2015	Send message to Michael Caylao re docs regarding AZ client Thomas Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/4/2015	Coordinate with Jenny Anderson with docs, 1st interrogatories, 1st request for production, document checklist, and master grid;	$795.00	0.30	$238.50
Emerson, John	11	5/4/2015	Coordinate with Arkansas client Bob Harmon regarding purchases from 2010 and 2011 from Samsung, LG, Panasonic, Sanyo, Sony, NEC, NEC Tokin, Hitachi, Toshiba, or Maxell;	$795.00	0.40	$318.00
Emerson, John	11	5/4/2015	review client questionnaire for Oregon client Lissy Moore;	$795.00	0.10	$79.50
Emerson, John	11	5/4/2015	Coordination with T Autry re client questionnaire for Oregon client Lissy Moore	$795.00	0.20	$159.00
Emerson, John	11	5/4/2015	Coordinate with Lissy Moore re her Samsung phone;	$795.00	0.30	$238.50
Emerson, John	11	5/4/2015	Coordination with Demetrius Lambrinos re Lissy Moore issues;	$795.00	0.20	$159.00
Emerson, John	11	5/4/2015	Coordination with Demetrius with Moore's client questionnaire (that was previously sent to Lasha);	$795.00	0.30	$238.50
Emerson, John	11	5/4/2015	Coordination with Jenny Anderson re my working directly with Demetrius on my clients issues;	$795.00	0.40	$318.00
Emerson, John	11	5/4/2015	send message to T Autry re other cases where A-1 or Bob Harmon has been a client and class representative;	$795.00	0.20	$159.00
Emerson, John	11	5/4/2015	Read email from T Autry with list of cases where Bob Harmon has been a client.	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	Conference with Scott Poynter re my meeting with client Harmon today re discovery matters;	$795.00	0.30	$238.50
Emerson, John	11	5/5/2015	read email from client Alice Moore in Oregon re her battery purchase; email Alice re holding on to her items;	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	Conference with Will Crowder re my meeting with Bob Harmon at A-1 re discovery; drive to North Little Rock, Arkansas and meet with client, Bob Harmon of A-1 Computers re discovery.	$795.00	1.50	$1,192.50
Emerson, John	11	5/5/2015	Read message from T Autry re the docs for my review re Harmon's prior work as a class rep in other cases; review those docs;	$795.00	0.30	$238.50
Emerson, John	11	5/5/2015	read message from Harmon re his two Toshiba batteries;	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	read message Demetrius Lambrinos re the Oregon client Alice Moore;	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	read Demetrius message re other qualifying purchases by Harmon;	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	read message from Demetrious regarding my Arizona client Thomas Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/5/2015	reply to email message from Demetrious regarding my Arizona client Thomas Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	Send message to Demetrius Lambrinos regarding Oregon client Alice Moore, complaint, client questionnaire, my contact with Arizona client, Mr. Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	send message to client Bob Harmon regarding my driving over to his store to pick up the Toshiba batteries in question;	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	send message to Demetrius regarding these two Toshiba batteries;	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	read message from Michael Caylao with various documents on AZ client Mr. Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	compare Tuohy docs with what we have here;	$795.00	0.20	$159.00

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Emerson, John	11	5/6/2015	Telephone conf with Bob about him having his batteries ready for pick-up and my driving over to see him and pick up batteries.	$795.00	0.10	$79.50
Emerson, John	11	5/6/2015	Meet Bob at his new office; pick up batteries, discuss batteries with Bob, and drive back to Little Rock office.	$795.00	1.40	$1,113.00
Emerson, John	11	5/6/2015	send message to Michael Caylao re my getting the Tuohy data filled in for him; read message from Demetrius Lambrinos re Oregon issues;	$795.00	0.20	$159.00
Emerson, John	3	5/7/2015	Review client file material for discovery responses.	$795.00	0.50	$397.50
Emerson, John	11	5/7/2015	Email Demetrius re A-1 information in email format rather than spreadsheet format.	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Email client Tuohy re discovery response issues	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Read Demetrius email re the A-1 info that I sent to him.	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Email Demetrius re client Tuohy information	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Read Demetrius email re Touhy	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Read another Demetrius email re Tuohy info	$795.00	0.10	$79.50
Emerson, John	11	5/7/2015	Multiple conferences with Bob Harmon at A-1 discovery issues.	$795.00	1.90	$1,510.50
Emerson, John	11	5/8/2015	Coordinate with Arizona client Tom Tuohy regarding the information on his Blackberry Curve and Toshiba laptop.	$795.00	0.20	$159.00
Emerson, John	11	5/8/2015	Coordinate with Tom Tuohy re class period issues and other products.	$795.00	0.20	$159.00
Emerson, John	11	5/8/2015	Coordinate with Demetrious Lambrinos and Michael Cayloa re Tuohy's Blackberry and Toshiba laptop.	$795.00	0.40	$318.00
Emerson, John	11	5/8/2015	Conference with Demetrius Lambrinos re the replacement batteries that Harmon purchased for A-1.	$795.00	0.30	$238.50
Emerson, John	11	5/8/2015	Edit the Interrogatory Response for A-1, dates of purchase, resale issues, verification and send to co-counsel.	$795.00	1.10	$874.50
Emerson, John	11	5/9/2015	Read Demetrius Lambrinos message with updated Verification form for Tuohy and issues re the Blackberry battery;	$795.00	0.20	$159.00
Emerson, John	11	5/9/2016	Read another message from Demetrious with finalized version if Interrogatory Responses for Tom Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/9/2016	Review finalized version of Interrogatory Responses for Tom Tuohy that were emailed to me from Demetrious.	$795.00	0.60	$477.00
Emerson, John	11	5/11/2015	Telephone conf with client Bob Harmon at A-1 Computers re the eReader device and other batteries, Interog Verification, etc.;	$795.00	0.20	$159.00
Emerson, John	11	5/11/2015	email Demetrius re eReader device and resale issues.	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	read Demetrius email re eReader device and resale issue re other batteries.	$795.00	0.20	$159.00
Emerson, John	11	5/11/2015	telephone conf with Demetrius Lambrinos re eReader device and resale issue re other batteries.	$795.00	0.40	$318.00
Emerson, John	11	5/11/2015	read Lambrinos email with finalized Rogs for A-1.	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	Meet with client Bob Harmon at his offices and go over all of these issues with his devices and batteries; drive back to Little Rock office from Mr. Harmon's office.	$795.00	1.50	$1,192.50
Emerson, John	11	5/11/2015	2nd t/conf with Demetrius Lambrinos re Harmon and A-1 issues;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	t/message to client Thomas Tuohy re his batteries;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	Coordinate with client Tuohy re his Interog Verification;	$795.00	0.30	$238.50
Emerson, John	11	5/11/2015	email Demetrius and Caylao re Tuohy matter; read Demetrius email confirming;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	read Demetrius email re Stip to drop A-1 and substituting Bob;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	Read Demetrius email re Rog responses.	$795.00	0.10	$79.50
Emerson, John	11	5/11/2015	Analyze Rog responses.	$795.00	0.30	$238.50
Emerson, John	11	5/11/2015	Read Tuohy email re shipping his Blackberry to me.	$795.00	0.10	$79.50

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Emerson, John	11	5/11/2015	read Demetrius email re Verification; email Verification again; read another Demetrious email saying nothing attached;	$795.00	0.10	$79.50
Emerson, John	11	5/12/2015	Receive Blackberry from client Tuohy;	$795.00	0.10	$79.50
Emerson, John	11	5/12/2015	photograph, write down info, and prepare chain of custody form re same.	$795.00	0.30	$238.50
Emerson, John	11	5/12/2015	Coordination with T Autry re Tuohy Verification.	$795.00	0.20	$159.00
Emerson, John	11	5/12/2015	Coordinate with Demetrius and Caylao re the Verification from Tuohy;	$795.00	0.30	$238.50
Emerson, John	11	5/13/2015	Draft letter to Demetrius Lambrinos re the Blackberry that I received from client Thomas Tuohy;	$795.00	0.30	$238.50
Emerson, John	11	5/13/2015	t/conf with client Bob Harmon re picking up the 2nd Literati eReader; text message to Harmon re same;	$795.00	0.20	$159.00
Emerson, John	11	5/14/2015	Meet with Bob Harmon at his office and pick up the 2nd Literati eReader device; return to my office.	$795.00	1.50	$1,192.50
Emerson, John	11	5/14/2015	prepare letter to Demetrius and Michael Caylao transmitting the two Literati eReader devices and charger to them;	$795.00	0.20	$159.00
Emerson, John	11	5/29/2015	Coordinate with Tom Tuohy re his expense in sending us his BB device and safekeeping of the device.	$795.00	0.10	$79.50
Emerson, John	11	5/29/2015	Coordinate with Charlie Gastineau re reimbursement to Tom Tuohy for expenses sending us his Blackberry device.	$795.00	0.10	$79.50
Emerson, John	11	9/15/2015	t/conf with Demetrius Lambrinos re Toshiba MSJ issues and my calling the AZ client Tom Tuohy re Toshiba emails, etc.;	$795.00	0.70	$556.50
Emerson, John	11	9/15/2015	Telephone conference with AZ client Tom Tuohy about his email system, etc.;	$795.00	0.30	$238.50
Emerson, John	11	9/15/2015	email to Mr. Tuohy re the his email system	$795.00	0.10	$79.50
Emerson, John	11	9/15/2015	2nd t/conf with Demetrius re A-1 Computer and Robert Harmon issues;	$795.00	0.30	$238.50
Emerson, John	11	9/15/2015	t/message from Tom Tuohy re these matters;	$795.00	0.10	$79.50
Emerson, John	11	9/15/2015	t/conf with Tom Tuohy re Toshiba issues;	$795.00	0.30	$238.50
Emerson, John	11	9/15/2015	email Demetrius Lambrinos re Tom's answers and two more questions re Toshiba;	$795.00	0.10	$79.50
Emerson, John	11	9/15/2015	t/message to Tom Tuohy re two additional questions re Toshiba;	$795.00	0.10	$79.50
Emerson, John	11	9/17/2015	Telephone conf and meeting with client Bob Harmon re meeting at his office to discuss questions from Demetrius Lambrinos, the document preservation doc, substituting him in for his business A-1 Computers, new client agreement, and client questionnaire.	$795.00	1.50	$1,192.50
Emerson, John	11	9/17/2015	Email Demetrious re my meeting today with client Bob Harmon;	$795.00	0.10	$79.50
Emerson, John	11	9/17/2015	Email scanned Harmon docs to Demetrius Lambrinos;	$795.00	0.10	$79.50
Emerson, John	11	9/17/2015	Update client questionnaire for Harmon;	$795.00	0.30	$238.50
Emerson, John	11	9/17/2015	email Demetrius the Client Questionnaire from Harmon	$795.00	0.10	$79.50
Emerson, John	11	9/22/2015	Coordinate with Demetrius Lambrinos re the document preservation declaration for Mr. Harmon's signature and getting the declaration squared away	$795.00	0.30	$238.50
Emerson, John	11	9/23/2015	Coordinate with Tanya Autry re her message to Demetrius, Michael Caylao, and David Scott re the Declaration on document preservation signed by Mr. Harmon;	$795.00	0.20	$159.00
Emerson, John	11	9/29/2015	Read message from Demetrius Lambrinos re a Cerification for A-1 for Interrogatory Responses.	$795.00	0.10	$79.50
Emerson, John	11	9/29/2015	Coordinate with Robert Harmon at A-1 re Certification.	$795.00	0.10	$79.50
Emerson, John	11	12/10/2015	Coordinate with Kathryn Hoek at Susman re depositions of IPP's, Hunt, Johns, Knowles, Sellers, and Van Patten.	$795.00	0.30	$238.50
Emerson, John	11	12/14/2015	Coordinate with Hoek, Lambrinos, and Sklaver re my clients, Tuohy and Harmon and Ken Mann message re Mr. Hunt in Phoenix;	$795.00	0.20	$159.00

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Emerson, John	11	12/22/2015	Coordinate with Kathryn Hoek at Susman, Demetrious Lambrinos at Cotchett, and Steve Sklaver at Susman re client matters related to Harmon and Tuohy and the qualifying purchases.	$795.00	0.50	$397.50
Emerson, John	11	12/23/2016	telephone message from Jeaneth Decena at Hagens Berman regarding Robert Harmon-AR Rep questions;	$795.00	0.10	$79.50
Emerson, John	11	12/23/2015	Review Harmon Client Questionnaire for discussion with Jeaneth;	$795.00	0.50	$397.50
Emerson, John	11	12/23/2015	Send Questionnaire from Sept 2015 to Jeaneth; t/conf with Jeaneth and go over Client Questionnaire;	$795.00	0.40	$318.00
Emerson, John	11	1/7/2016	Coordinate with Michael Caylao at Cotchett Pitre regarding the Verification form for Mr. Tuohy;	$795.00	0.20	$159.00
Emerson, John	11	1/8/2016	Read message from Michael Caylao about the Tuohy Verification;	$795.00	0.10	$79.50
Emerson, John	11	1/8/2016	send message to Arizona client Tom Tuohy regarding Supplementary Objections and Responses to 2nd Interrogatories and Verification;	$795.00	0.20	$159.00
Emerson, John	11	1/8/2016	send message to Michael Caylao re the Verification;	$795.00	0.10	$79.50
Emerson, John	11	2/2/2016	Coordination with Arizona client Tom Tuohy again regarding Supplementary Objections and Responses to 2nd Interrogatories and Verification;	$795.00	0.30	$238.50
Emerson, John	11	2/2/2016	review evidence storage and locate two additional batteries for Arkansas client Bob Harmon, one Dell and one unknown Chinese;	$795.00	0.30	$238.50
Emerson, John	11	2/2/2016	Coordinate with Harmon re two additional batteries	$795.00	0.20	$159.00
Emerson, John	11	2/2/2016	Photograph and email photo of the client's laptop Chinese battery; photograph and email photo of the client's Dell laptop battery made in Korea;	$795.00	0.50	$397.50
Emerson, John	11	2/3/2016	Telephone conference with Arizona client Thomas Tuohy regarding his Verification	$795.00	0.30	$238.50
Emerson, John	11	2/3/2016	Coordinate with client Harmon re other batteries in our evidence storage room	$795.00	0.30	$238.50
Emerson, John	11	2/8/2016	Coordination with AZ client Thomas Tuohy re letter he received from Shana Scarlett and the issue of his Verification form;	$795.00	0.30	$238.50
Emerson, John	11	2/8/2016	Email to Tom forwarding message from Michael Caylao re the Verification form;	$795.00	0.10	$79.50
Emerson, John	11	2/15/2016	Read message from Demetrius Lambrinos re a good time for Krysta to call re Mr. Tuohy and send message to Demetrius and Krysta Kauble Pachman re a call tomorrow re Mr. Tuohy	$795.00	0.20	$159.00
Emerson, John	11	2/15/2016	send message to Demetrius and Caylao with signed verification from Tuohy	$795.00	0.10	$79.50
Emerson, John	11	2/15/2016	read message from Demetrius re Tuohy verification	$795.00	0.10	$79.50
Emerson, John	11	3/11/2016	Read message from Krysta Kauble Pachman at Susman Godfrey re the hearing with the magistrate judge and verification issues	$795.00	0.10	$79.50
Emerson, John	11	3/11/2016	Receive and review documents including First Amended Responses to Defendants First Set of Interrogatories; First Amended Responses to Toshiba's First Set of Requests for Production, Defendants Verification, and Toshiba Verification.	$795.00	0.40	$318.00
Emerson, John	11	3/12/2016	Coordination with AZ plaintiff Thomas Tuohy re the hearing with the magistrate judge and verification issues and sending him the documents sent to us from Krysta	$795.00	0.40	$318.00
Emerson, John	11	3/12/2016	Coordinate with AR plaintiff Bob Harmon re the hearing with the magistrate judge and verification issues and sending him the documents sent to us from Krysta	$795.00	0.30	$238.50
Emerson, John	11	3/12/2016	send message to Krysta Kauble Pachman re my sending the documents to my clients;	$795.00	0.10	$79.50
Emerson, John	11	3/12/2016	Coordination with Demetrius Lambrinos message re reviewing the responses with the clients before they sign verifications	$795.00	0.20	$159.00
Emerson, John	11	3/14/2016	Coordination with Demetrius Lambrinos re reviewing the discovery with the clients before they sign the verifications.	$795.00	0.30	$238.50
Emerson, John	11	3/16/2016	Read message from AR client Bob Harmon re his Verifications; review his verifications;	$795.00	0.20	$159.00

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Emerson, John	11	3/16/2016	Coordinate with Tanya Autry regarding edits to Harmon verifications.	$795.00	0.10	$79.50
Emerson, John	11	3/17/2016	Send message to Demetrius Lambrinos, Krysta Kauble Pachman, and David Scott re Verifications to discovery	$795.00	0.10	$79.50
Emerson, John	11	3/17/2016	Coordinate with AZ plaintiff Thomas Tuohy re the responses and review of his two Verifications, one to defendants and the other to Toshiba.	$795.00	0.30	$238.50
Emerson, John	11	3/17/2016	Send Tuohy Verifications to Demetrius Lambrinos, Krysta Kauble Pachman, and David Scott	$795.00	0.10	$79.50
Emerson, John	11	3/17/2016	confer with Bob Harmon re his Verifications	$795.00	0.20	$159.00
Emerson, John	11	3/17/2016	Send Bob Harmon's Verifications to Demetrius and Krysta.	$795.00	0.10	$79.50
Emerson, John	11	5/11/2016	Coordinate with Demetrius Lambrinos message re update Verification form issues;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2016	Coordination with Demetrius Lambrinos and Michael Caylao re A-1 resale of batteries issues.	$795.00	0.40	$318.00
Emerson, John	11	5/11/2016	Drive to Bob Harmon's offices to coordinate with him regarding batteries and get him to sign verification.	$795.00	1.40	$1,113.00
Emerson, John	11	5/11/2016	send Tom Tuohy in AZ a message with the Tuohy Responses to Interrogatories and re what Demetrius and Michael Caylao said about the Toshiba;	$795.00	0.10	$79.50
Emerson, John	11	5/11/2016	Coordinate with Demetrius re my conversation with Thomas Tuohy by phone, his verification, and his answers to interrogatories;	$795.00	0.30	$238.50
EMERSON JOHN			TOTAL		57.70	$45,871.50
Poynter, Scott	11	10/7/2014	Coordinate with J Emerson and W Crowder re client information and forms.	$695.00	0.20	$139.00
Poynter, Scott	8	10/17/2014	Work on responding to ESI request on behalf of client, Robert Harmon for A-1 Computers.	$695.00	0.20	$139.00
Poynter, Scott	11	4/28/2015	Coordination with Jennie Anderson re discovery from A-1 computers.	$695.00	0.30	$208.50
POYNTER, SCOTT			TOTAL		0.70	$486.50
Crowder, William	11	6/28/2013	Telephone conference and emails with client Lissy Moore re Oregon cases and damages.	$550.00	0.50	$275.00
Crowder, William	11	6/28/2013	Coordination with J Emerson and Minnesota client re his client damages and case.	$550.00	0.10	$55.00
Crowder, William	11	7/1/2013	Coordinate with J Emerson re Noss email re other plaintiffs.	$550.00	0.10	$55.00
Crowder, William	11	7/1/2013	Coordinate with co-counsel re Oregon client damages.	$550.00	0.20	$110.00
Crowder, William	11	7/2/2013	Receive and review retainer agreemnt from Oregon client and email to J Emerson.	$550.00	0.10	$55.00
Crowder, William	11	7/2/2013	Coordination with J Emerson and C Jennings re the draft consolidated, amended complaint and sending the information on our Oregon Client to Walter Noss.	$550.00	0.30	$165.00
Crowder, William	11	7/2/2013	Email Oregon client info to Walter Noss.	$550.00	0.10	$55.00
Crowder, William	11	10/3/2014	Communicate with Mr. Harmon re meeting to go over the preservation declaration and questionnaire. Discussed what we would need from him for same and verbally reviewed the questinnaire so he could note what we would need for him to collect for our files.	$550.00	1.00	$550.00
Crowder, William	11	10/3/2014	Coordinate with John Emerson and Scott Poynter regarding Mr. Harmon.	$550.00	0.30	$165.00
Crowder, William	11	10/5/2014	Meet with Mr. Harmon at A-1 Computer Offices to go over case status, review files, and questionnaire and preservation .	$550.00	2.30	$1,265.00
Crowder, William	11	10/7/2014	Catalogue Client Materials.	$550.00	0.40	$220.00
Crowder, William	11	10/7/2014	Complete Questionnaire and Forms with Mr. Harmon and Email same to John Emerson & Scott Poynter.	$550.00	0.60	$330.00
Crowder, William	11	10/7/2014	Coordinate with John Emerson re Harmon documents and evidence	$550.00	0.10	$55.00
Crowder, William	11	10/7/2014	Prepare to final and send A-1 documents to Jennie Anderson.	$550.00	0.20	$110.00
Crowder, William	11	10/8/2014	Coordinate with John Emerson re client Harmon and A-1 docs;	$550.00	0.10	$55.00
Crowder, William	11	10/8/2014	Emails to Jennie Anderson re edits Harmon's Declaration.	$550.00	0.20	$110.00
Crowder, William	11	10/8/2014	Revise/Edit Declaration as to my coordination with Jennie Anderson.	$550.00	0.80	$440.00

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Crowder, William	11	10/8/2014	Coordinate with John Emerson re Tuohy Declaration.	$550.00	0.10	$55.00
Crowder, William	11	10/17/2014	Communicate with Ms. Anderson and Mr. Harmon re ESI letter and strategy re same.	$550.00	0.30	$165.00
Crowder, William	11	10/17/2014	Draft ESI letter.	$550.00	0.90	$495.00
Crowder, William	11	10/17/2014	Conference with John Emerson regarding ESI Letter.	$550.00	0.10	$55.00
Crowder, William	11	10/17/2014	Work with Jennie Anderson re our client A-1 Computers; read email from Jennie Anderson re same	$550.00	0.50	$275.00
Crowder, William	11	10/17/2014	Draft letter to Bob Harmon regarding Amended Complaint edits	$550.00	0.20	$110.00
Crowder, William	11	10/17/2014	Review next draft letter from Jennie with redline edits and clean version.	$550.00	0.30	$165.00
Crowder, William	11	12/5/2014	Communicate with Mr. Harmon and Ms. Jennie Anderson regarding corporate title of Mr. Harmon.	$550.00	0.30	$165.00
Crowder, William			TOTAL		10.10	$5,555.00
Jennings, Chris	1	6/20/2013	Coordinate with J Emerson and Lead Counsel re Tuohy cient questionnaire.	$550.00	0.20	$110.00
Jennings, Chris	8	7/2/2013	Coordinate with W Crowder and J Emerson re status of client review and signatures needed in re protective order. Coordinate with J Emerson and W Crowder re Oregon client, draft consolidated complaint, and email Oregon client retainer agreement to Walter Noss.	$550.00	1.20	$660.00
Jennings, Chris	1	10/6/2014	Coordinate with John Emerson regarding Tom Tuohy & Lissy Moore Retainer Agreements. Email same to John emerson.	$550.00	0.30	$165.00
Jennings, Chris			TOTAL		1.70	$935.00
Gastineau, Charlie	1	10/9/2014	Conference with J. Emerson re status of Robert Harmon, Lissy Moore, and Tom Tuohy signed agreements, W-9 forms, completed client information sheets, and signed Declarations forms and organization of files.	$150.00	0.20	$30.00
Gastineau, Charlie	1	10/9/2014	Review Harmon, Moore, and Tuohy client information sheets.	$150.00	0.20	$30.00
Gastineau, Charlie	1	10/9/2014	Email Harmon, Moore, and Tuohy documents ot J. Emerson.	$150.00	0.10	$15.00
Gastineau, Charlie	1	10/9/2014	Coordinate with Tanya Autry regarding Tuohy documents and her conference with J. Emerson re same.	$150.00	0.10	$15.00
Gastineau, Charlie			TOTAL		0.60	$90.00
Autry, Tanya	8	1/3/2014	Draft, prepare to final and file Motion to Withdraw Chris Jennings as Counsel of Record.	$150.00	0.50	$75.00
Autry, Tanya	8	10/8/2014	Coordinate with J Emerson re information for Robert Harmon at A-1 Computers.	$150.00	0.10	$15.00
Autry, Tanya	8	10/8/2014	Prepare and coordinate with J Emerson and Robert Harmon re Amended Revised Declaration and email same to J Emerson.	$150.00	0.20	$30.00
Autry, Tanya	11	10/9/2014	Coordinate with J Emerson re status of Robert Harmon, Lissy Moore, and Tom Tuohy documents, including the questionnaire, info sheet, and retainer agreements. Pull the original documents for Mr. Harmon and Ms. Moore and scan them to the file.	$150.00	0.10	$15.00
Autry, Tanya	11	10/9/2014	Telephone ocnference with Tom Tuohy re him sending me his documents including the questionnaire, info sheet, and retainer agreement, for the file and send to Mr. Crotchett's office for processing.	$150.00	0.20	$30.00
Autry, Tanya	11	10/9/2014	Receive 19 individual one page faxes from Mr. Tuohy and consolidate into four complete documents and email to J Emerson. These documents are the final Declaration of Document Preservation, Receipts for Verizon Purchases, Duties of a Class Representative and Fax Cover Sheet with Client contact Information.	$150.00	0.50	$75.00
Autry, Tanya	8	8/10/2014	Draft and prepare to final the Motion and Proposed Order for Change of Firm Affiliation of John Emerson and file with the Court. Send service copies to all counsel on service list.	$150.00	0.40	$60.00
Autry, Tanya	8	8/10/2014	Draft and prepare to final the Motion and Proposed Order for Change of Firm Affiliation, address, and contact info for Scott Poynter and file with the Court. Send service copies to all counsel on service list.	$150.00	0.40	$60.00

BATTERY ANTITRUST LITIGATION
REVISED/AMENDED TIME REPORT

Autry, Tanya	8	9/17/2015	Coordination with Robert Harmon at A-1 Computers re new Attorney-Client Agreement for Emerson Scott, LLP, with new questionnaire, Declaration of Document Production, Duties of a Class Representative, and preservation of documents and invoices that were sent in the beginning stages of this case.	$150.00	0.40	$60.00
Autry, Tanya	8	9/17/2015	Coordination with J Emerson re me coordinating with Bob Harmon and sending the A-1 Computers new Attorney-Client Agreement for Emerson Scott, LLP, new questionnaire, Declaration of Document Production, Duties of a Class Representative, and preservation of documents and invoices to co-counsel.	$150.00	0.20	$30.00
Autry, Tanya	11	9/23/2015	Coordinate with J Emerson, Demetrius Lambrinos, Michael Caylao from CPMLEGAL and Bob Harmon re A-1 Computers (Robert S. Harmon's) Declaration of Document Preservation.	$150.00	0.10	$15.00
Autry, Tanya	11	9/23/2015	Call to set up meeting and drive to meet Mr. Harmon at his store in Jacksonville, AR to go over the Document Preservation Declaration and get him to sign.	$150.00	0.70	$105.00
Autry, Tanya	11	9/23/2015	Email Mr. Lambrinos and Mr. Caylao a copy of Mr. Harmon's signed Document Preservation Declaration (per their instructions from our conference earlier today).	$150.00	0.10	$15.00
AUTRY, TANYA			TOTAL		3.90	$585.00
			TOTAL		74.70	$53,523.00

EXHIBIT 23

Brian D. Penny
Goldman Scarlato & Penny, P.C.
161 Washington Street, Suite 1025
Conshohocken, PA 19428
Telephone: (484) 342-0700
Facsimile: (484) 580-8747

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF BRIAN D. PENNY IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GOLDMAN SCARLATO & PENNY, P.C.**

I, Brian D. Penny, declare:

1. I am a shareholder in the law firm of Goldman Scarlato & Penny, P.C. ("GSP"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Rebecca Cohen, Dan Wehking, Steven Wiley, Ellis Greenspan, Grace Shire, Louis Messina, Patrice Nealon, Marylin Sharp, Dawn Potvin (Hall),

and Elizabeth Porter and as counsel for IPPs throughout the course of this litigation. The background and experience of GSP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, GSP performed the following work: review and coding of documents and quality control review of documents coded by other attorneys in this matter, all as directed by Lead Counsel.

5. A summary of work performed by GSP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Brian D. Penny in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Goldman Scarlato & Penny, P.C. and filed on May 26, 2017. (ECF No. 1813-16). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by GSP since June 1, 2013 was 470.5, with a corresponding lodestar of $165,457.00.

7. GSP is not seeking any reimbursement for the expenses we incurred in this matter.

8. I have reviewed the time reported by GSP in this case, which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on March 28, 2019 at Conshohocken, PA.

/s/ Brian D. Penny

Brian D. Penny

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

GOLDMAN SCARLATO & PENNY, P.C.
Eight Tower Bridge, Suite 1025
161 Washington Street
Conshohocken, PA 19428
(484) 342-0700

GOLDMAN SCARLATO & PENNY, P.C. is a Pennsylvania-based plaintiff's rights and class action law firm. Our lawyers have dedicated their careers to vindicating the rights of ordinary people victimized by corporate misconduct, deceptive consumer practices, or who have suffered harm as a result of defective medical devices and dangerous drugs. We level the playing field for our clients by combining their voices with hundreds or thousands of others, and provide top-flight legal representation that matches the skill and expertise of the nation's largest defense law firms. Goldman Scarlato & Penny, P.C. prosecutes securities fraud, antitrust, and consumer fraud class actions, as well as mass actions on behalf of those injured by defective medical devices and dangerous drugs throughout the U.S. The Firm's lawyers have recovered hundreds of millions of dollars on behalf of their clients.

The Firm has played prominent roles in numerous noteworthy and ground-breaking cases. Just by way of example, the Firm has fought for individuals whose most sensitive and private data was compromised in *In re Anthem, Inc. Data Breach Litigation* ($115 million settlement on behalf of healthcare patients), and *In re Target Corporation Customer Data Security Breach Litig.* ($10 million settlement fund on behalf of consumers). It has fought to enforce the nation's antitrust laws and ensure a level competitive playing field in cases such as *In re Air Cargo Antitrust Litigation* (settlements of over $1 billion), *In re Vitamins Antitrust Litigation* (settlements of over $1.7 billion), *In re Brand Name Prescription Drugs Antitrust Litigation* (settlements of approximately $700 million), and *Logue v. West Penn Multi-Listing*

Service ($2.75 million settlement on behalf of consumers), and it successfully challenged businesses that misrepresented their products to consumers in *Mirakay v. Dakota Growers Pasta Co.* (settlement valued at over $23 million). In addition, the Firm has fought to protect investors and enforce the nation's securities laws in cases such as *In re Broadcom Securities Litigation* (settlement of $150 million), and *AOL Time Warner Securities Litigation*, (settlement of over $2.5 billion for investors). The Firm has also played important roles in difficult and cutting-edge cases involving issues important to the public in cases such as *In Re NHL Concussion Litigation* (D. Minn. 2014) (alleging league failed to protect players from known risks of concussions).

MARK S. GOLDMAN. Since 1986, Mark Goldman has concentrated his practice in many different types of complex litigation, including cases involving violations of the federal securities and antitrust laws and state consumer protection statutes. Mr. Goldman served as co-lead counsel in a number of class actions brought against life insurance companies, challenging the manner in which premiums are charged during the first year of coverage. In the antitrust field, Mr. Goldman litigated several cases that led to recoveries exceeding $1 billion each, for the benefit of the consumers and small businesses he represented, including *In re Air Cargo Antitrust Litigation,* Case No. 06-MD-1775 (E.D.N.Y. 2016), *In re Vitamins Antitrust Litigation,* MDL No. 1285 (D.D.C. 1999), *In re NASDAQ Antitrust Litigation,* Case No. 94-cv-3996 (S.D.N.Y. 1994), and *In re Brand Name Prescription Drugs Antitrust Litigation,* Case No. 94-c-897 (N.D. Ill. 1994). Mr. Goldman currently represents numerous victims of identity theft seeking to hold accountable companies that failed to protect the safety of private data maintained on their networks, including *In re Community Health Systems, Inc. Customer Data Security Breach Litigation*, 15-cv-222 (N.D. Ala. 2015), *In re Anthem, Inc. Data Breach Litigation*, Case No. 15-MD-02617-LHK (N.D. Cal. 2015), *In re Intuit Data Litigation*, 15-cv-1778 (N.D. Cal. 2015),

and *In re Medical Informatics Engineering, Inc. Customer Data Security Breach Litigation,* MDL No. (N.D. Ind. 2015). In the area of securities litigation, Mr. Goldman played a prominent role in class actions brought under the antifraud provisions of the Securities Exchange Act of 1934, including *In re Nuskin Enterprises, Inc. Securities Litigation,* Master File No. 2:14-cv-00033 (D. Utah 2014), *In Re: Spectrum Pharmaceuticals, Inc. Securities Litigation*, Case No. 2:13-cv-00433 (D. Nev. 2013), and *In re Omnivision Technologies, Inc. Litigation*, Case No.: 5:11-cv-05235 (N.D. Cal. 2011). Mr. Goldman also prosecuted a number of insider trading cases brought against company insiders who, in violation of Section 16(b) of the Securities Exchange Act of 1934, engaged in short swing trading.

Mr. Goldman earned his undergraduate degree from the Pennsylvania State University in 1981 and his law degree from the University of Kansas School of Law in 1986. He is a member of the Pennsylvania bar.

PAUL J. SCARLATO. Paul Scarlato has concentrated his practice on the litigation of complex class actions since 1989. He has litigated numerous cases under the securities, consumer, antitrust and common law involving companies in a broad range of industries, and has litigated many cases involving financial and accounting fraud.

In securities fraud cases, Mr. Scarlato was one of three lead attorneys for the class in *Kaufman v. Motorola, Inc.,* a securities fraud class action that settled just weeks before trial, and along with Mr. Weinstein of his predecessor firm, was lead counsel in *Seidman v. American Mobile Systems, Inc.,* (E.D. Pa.), a securities class action that resulted in a settlement for the plaintiff class again on the eve of trail. Mr. Scarlato served as co-lead counsel in *In re: Corel Corporation Securities Litigation* (E.D. Pa.). Mr. Scarlato is currently one of the lead lawyers in *Leibovic v. United Shore Financial Services; Afzal v. BMW of North America, LLC*, and *Yao Yi Liu v.*

Wilmington Trust Company. He serves on the plaintiffs' Executive Committee in *Vikram Bhatia, D.D.S. v. 3M Company*, Case No. 16-cv-01304 (D. Minn.), and is counsel in *In re Platinum and Palladium Antitrust Litigation,* Case No. 14-cv-09391 (S.D.N.Y), *In re Treasury Securities Auction Antitrust Litigation*, Case No. 15-md-02673 (S.D.N.Y.), and *In re Liquid Aluminum Sulfate Antitrust Litigation*, Case No. 15-7827 (D.N.J.).

Mr. Scarlato graduated from Moravian College in 1983 with a degree in accounting, and received his Juris Doctor degree from the Widener University School of Law in 1986. Mr. Scarlato served as law clerk to the Honorable Nelson Diaz, of the Court of Common Pleas of Philadelphia County, and thereafter as law clerk to the Honorable James T. McDermott, Justice of the Pennsylvania Supreme Court. After his clerkships, and prior to becoming a litigator, Mr. Scarlato was a member of the tax department of a major accounting firm where he provided a broad range of accounting services to large business clients in a variety of industries.

Mr. Scarlato is a member of the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and those of various federal district and circuit courts.

BRIAN D. PENNY. Since joining the Firm in 2002, Mr. Penny has focused his practice on class action litigation principally in the areas of antitrust, consumer protection and securities fraud litigation. He was lead counsel in *Mirakay v. Dakota Growers Pasta Co.* (D.N.J. 2013) (alleging false and misleading advertising of pasta products and resulting in a settlement valued at over $23 million); *Logue v. West Penn Multi-Listing Service* (W.D. Pa. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in $2.75 million settlement); *Allan v. Realcomp II* (E.D. Mich. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in a $3.25 million settlement*); Boland v. Columbia Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service and resulting in a $1 million

settlement); and *Robertson v. Hilton-Head Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service).

Mr. Penny is currently serving on the executive committees in *In Re NHL Concussion Litigation* (D. Minn. 2014) (alleging league failed to protect players from known risks of concussions), and *In re: Community Health Systems, Inc., Customer Security Data Breach Litigation* (N.D. Ala. 2015) (alleging damages caused by data breach of health care records). He is on the Third Party Discovery Committee in *In re Disposable Contact Lenses Antitrust Litigation*, 15-md-2626 (M.D. Fla.), and is actively engaged as class counsel in *In re: Clobetasol Cases*, 16-CB-27240 (E.D. Pa. 2017) and *In re Lidocaine-Prilocaine*, 16-LD-27242 (E.D. Pa. 2017) where he leads the EPP discovery team in those cases, *In re Broiler Chicken Antitrust Litigation*, 1:16-cv-08637 (N.D. Ill. 2016); and *Bhatia v. 3M Company*, 16-cv-1304 (D. Minn. 2016); *In re Epipen Marketing, Sales Practices and Antitrust Litigation*, 2:17-md-2785 (D. Kan. 2016).

Mr. Penny has also prosecuted numerous securities fraud class actions over the course of his career. He was a key member of the plaintiffs' teams that prosecuted *In re Broadcom Securities Litigation*, which resulted in a settlement of $150 million for the class, and *AOL Time Warner Securities Litigation*, which resulted in a settlement of over $2.5 billion for investors. Mr. Penny was also one of the lead attorneys representing the classes in a number of securities fraud actions arising out of stock option backdating, including, *In re Monster Worldwide, Inc. Securities Litigation* ($47.5 million settlement), *In re Mercury Interactive Securities Litigation* ($117.5 million settlement), *In re SafeNet, Inc. Securities Litigation* ($25 million settlement), *Ramsey v. MRV Communications et al.* ($10 million settlement), and *In re Semtech Securities Litigation* ($20 million settlement).

Mr. Penny received his Bachelor of Arts degree from Davidson College, Davidson, North Carolina, in 1997 and earned his Juris Doctor degree from Pennsylvania State University in 2000. After graduating from law school, Mr. Penny served as law clerk to the Honorable John T.J. Kelly, Jr., Senior Judge of the Superior Court of Pennsylvania. He has been named a Super Lawyer or Rising Star each year since 2010. In 2015, Mr. Penny was one of four finalists for the American Antitrust Institute's Enforcement Award for Outstanding Antitrust Litigation Achievement by a Young Lawyer for his work on *Allen, et al. v. Realcomp Ltd., et al.*

ALAN L. ROSCA. Alan focuses his legal practice on complex financial and commercial matters, particularly in the areas of securities litigation, investment fraud, and international investment disputes. He often represents institutional and individual investors in disputes with financial industry members arising out of investment fraud or misconduct. He prosecutes claims on behalf of investors through class actions in state or federal courts, and FINRA arbitrations. He also practices in the areas of wage-and-hour and other labor-related disputes, whistleblower matters, and antitrust cases, with a focus on market manipulation.

Alan has been a lecturer and adjunct professor of Securities Regulation at Cleveland-Marshall College of Law, Cleveland State University since 2012.

Alan has served as co-lead counsel, or is currently involved in a leading role, in class actions on behalf of investors who lost money as a result of alleged investment fraud or Ponzi schemes, as well as in other class action matters arising out of wage-and-hour or business disputes, including *Hanson v. Berthel Fisher & Company Financial Services, Inc., et al*. (N.D. Iowa 2013) (a securities class action on behalf of investors in an allegedly fraudulent real estate investment program that raised approximately $26 million from investors, predicated upon the role played by the program's underwriter); *Carol Prock v. Thompson National Properties, LLC,*

et al. (C.D. Cal. 2013) (a securities class action on behalf of investors in an allegedly fraudulent real estate investment program that raised approximately $17 million from the investing public, against the program's sponsors and promoters); *Yao-Yi Liu et al. v. Wilmington Trust Company* (W.D.N.Y. 2014) (a class action lawsuit on behalf of investors of a $145 million fraudulent scheme, alleging that the defendant trustee and custodian bank breached its duties as an escrow agent and aided the perpetrators of the scheme); *Spaude v. Mysyk* (N.D. Ohio 2015) (a securities class action on behalf of investors in a $55 million allegedly fraudulent oil-and-gas investment scheme, against the alleged perpetrators of the scheme and the law firm that assisted the scheme); *Jennifer Roth v. Life Time Fitness, Inc.* (D. Minn. 2015) (a wage-and-hour class action on behalf of fitness instructors seeking unpaid wages for work that was required by defendants); *Aleem v. Pearce & Durick* (D. North Dakota 2015) (a securities class action on behalf of investors in a $65 million fraudulent investment scheme, alleging that the defendants violated their fiduciary duties to the investors and assisted in the scheme's securities violations by serving as escrow agents for the investors' investments and offering materially false opinions to the investors regarding their investments in the scheme); *Strong v. Safe Auto Insurance Group, Inc. et al.* (S.D. Ohio 2016) (a wage-and-hour class action on behalf of employees of defendants seeking unpaid wages for work that was required by defendants); *Hay v. United Development Funding IV et al*. (N.D. Texas 2016) (a securities class action on behalf of investors in a $625 million allegedly Ponzi-like real estate investment scheme, against entities including the scheme, its principals and affiliated entities, as well as the alleged scheme's underwriter and auditor); *Fastrich v. Continental General Insurance Company* (D. Neb. 2016) (a class action on behalf of insurance agents affiliated with defendants, arising out of the alleged non-payment of certain fees and commissions owed to such agents); *Elliott v. Bank of Oklahoma* (D.N.J. 2016) (a class action

on behalf of investors in a $198 million allegedly fraudulent investment scheme perpetrated through a series of municipal bond offerings, against the trustee bank for the bond offerings and the underwriters of some of the offerings); *Ezeude v. PayPal Holdings, Inc*. et al. (N.D. Cal. 2017) (a class action lawsuit arising out of a $207 million allegedly fraudulent Internet investment scheme that victimized over 162,000 investors worldwide, alleging that defendants, who acted as payment processors for the scheme, facilitated and assisted the perpetration of the scheme).

Alan received his Juris Doctor degree summa cum laude from Cleveland-Marshall College of Law in May 2008. While in law school he served as a Managing Editor of the Cleveland State Law Review, received the Dean's (full) scholarship for the entire Juris Doctor program, was on the Dean's List, and won the "Best Oralist" award in the Jessup Moot Court competition, Pacific Region. He passed the Ohio Bar exam in top 1%, with the highest grade in the state to the multi-state (federal law) section.

He is licensed to practice law in the Ohio state and federal courts, and in other federal courts nationwide. He has been selected to the 2017 and 2018 Ohio Super Lawyers Rising Star list. He is a member of the Public Investors Arbitration Bar Association, the Cleveland Metropolitan Bar Association, where he served as the Chair of the Unlicensed Practice of Law Committee, and the Cleveland Diplomatic Corps. He also holds a Master of Business Administration degree from Baldwin-Wallace College, Ohio. He is a speaker on Ponzi schemes, investment fraud, cryptocurrencies, and attorney professionalism.

MELISSA FRY HAGUE

Melissa Hague has dedicated her career to the successful and diligent prosecution of complex mass tort cases. She is an advocate for consumer rights and victims injured as a result of

defective medical devices and pharmaceutical drugs. She was recently appointed by Judge Saylor of the US District Court of Massachusetts to serve on the Plaintiffs' Steering Committee in In Re: Zofran (Ondansetron) Products Liability Litigation, MDL 2657 on behalf of children born with birth defects as a result of in utero exposure to the drug Zofran.

Melissa has represented hundreds of clients who have suffered debilitating injuries caused by metal-on-metal hip implants, knee implants as well as transvaginal mesh implants. As a zealous advocate for her clients, Melissa has developed an intricate level of industry knowledge in this area of the law relating to the failure to properly design and test medical devices. Her mass tort litigation experience includes:

In Re Ethicon, Inc., Pelvic Repair System Products Liability Litigation, MDL 2327

In re: DePuy Orthopaedics, Inc., ASR Hip Implant Products Liability Litigation, MDL 2197

In re: DePuy Orthopedics, Inc., Pinnacle Hip Implant Products Liability Litigation, MDL 2244

In re: Biomet M2A Magnum Hip Implant Products Liability Litigation, MDL 2391

In re: Stryker Rejuvenate & ABG II Hip Implant Litigation, Ber-L-936-13

In re: Zimmer NexGen Knee Implant Products Liability Litigation, MDL 2272

In re: Human Tissue Products Liability Litigation, MDL 1763

Among her early successes, Melissa was an integral part to the successful resolution of the *In re: Human Tissue Products Liability Litigation*. Melissa successfully represented individual victims who received cadaver bone and tissue that was infected and not properly screened. As part of that litigation, Ms. Hague also represented dozens of families in lawsuits against funeral homes for the mutilation and illegal harvesting of body parts from their deceased

loved ones. For her efforts, Melissa was featured with partner Larry Cohan of Anapol Weiss in national news media regarding the Human Tissue litigation.

Melissa currently serves on the Executive Committee for the American Association for Justice (AAJ) as well as the Board of Governors. She is the Immediate Past Chair of the New Lawyers Division for AAJ, she is the current Chair of AAJ's Marketing and Practice Development Committee and was recognized by the President of AAJ for her Distinguished Service in 2017. She is also a supporter of EndDD.org where she speaks to high school students in her community as well as other communities about the dangers of distracted driving.

Melissa has been named a Rising Star in Pennsylvania Super Lawyers® since 2013. She was also selected for the state of New Jersey as The National Trial Lawyers: Top 40 Under 40 members, an elite group of the top attorneys under the age of 40 who have demonstrated excellence in their field.

DOUGLAS J. BENCH, JR. Mr. Bench earned his Bachelor of Arts degree from the University of Pittsburgh and his Juris Doctor from Cornell Law School. Prior to joining the Firm in 2012, Mr. Bench served as a Death Penalty Law Clerk for the U.S. District Court in the Western District of Pennsylvania from 2010-2012. He was in private practice from 2008-2010 in Johnstown, Pennsylvania, and taught undergraduate macro and micro economics at the University of Pittsburgh, Johnstown campus, from 2006-2008.

As a result of his economics background, Mr. Bench is naturally interested in antitrust violations, consumer fraud, and the market inefficiencies these violations engender. Mr. Bench primarily focuses on antitrust and consumer class actions. Representative cases include: *Kaufman v. CVS Caremark Corp.*, (D. R.I. 2014) (alleging consumer protection violations); *Weintraub v. Pharmavite*, (C.D. Cal. 2014) (same); *Mirakay v. Dakota Growers Pasta Co., Inc.*

(D. N.J. 2013) (alleging unfair trade practices and false advertising); *In re Nexium (Esomeprazole) Antitrust Litigation* (D. Mass. 2012) (alleging generic suppression claims on behalf of end-payors); *In re Ductile Iron Pipe Fittings (DIPF) Direct Purchaser Antitrust Litigation* (D.N.J. 2012) (alleging price fixing in the market for DIPF); *Allan v. Realcomp II* (E.D. Mich. 2010) (alleging antitrust violations) ($3.25M settlement pending approval); *Boland v. Columbia Multi-Listing Service* (D.S.C. 2009) (antitrust) ($1M settlement); *Robertson v. Hilton-Head Multi-Listing Service* (D.S.C. 2009) (antitrust) (settled on claims-paid basis).

Mr. Bench has authored the following law review articles: Douglas J. Bench, *Collateral Review of Career Offender Sentences: The Case for* Coram Nobis, 45 U. MICH. J. L. REFORM 155 (2011); Douglas J. Bench, *What Constitutes a Violent Felony After* Begay?, 67 J. MO. B. 209 (2011).

EXHIBIT 24

Brian D. Penny
Goldman Scarlato & Penny, P.C.
161 Washington Street, Suite 1025
Conshohocken, PA 19428
Telephone: (484) 342-0700
Facsimile: (484) 580-8747

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF BRIAN D. PENNY IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GOLDMAN SCARLATO & PENNY, P.C.**

I, Brian D. Penny, declare:

1. I am a shareholder of Goldman Scarlato & Penny, P.C. ("GSP"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Rebecca Cohen, Dan Wehking, Steven Wiley, Ellis Greenspan, Grace Shire, Louis Messina, Patrice Nealon, Marylin Sharp, Dawn Potvin (Hall),

and Elizabeth Porter and as counsel for IPPs throughout the course of this litigation. The background and experience of GSP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, GSP performed the following work: review and coding of documents and quality control review of documents coded by other attorneys in this matter, all as directed by Lead Counsel.

5. Attached hereto as **Exhibit B** is a billing summary of GSP'S total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by GSP during this period of time was 470.5, with a corresponding lodestar based on current rates of $165,457.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff hired by my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by GSP.

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

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

8. GSP is not seeking any reimbursement for the expenses we incurred in this matter.

9. I have reviewed the time records reported by GSP in this case, which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017 at Conshohocken, PA.

/s/ Brian D. Penny

Brian D. Penny

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

GOLDMAN, SCARLATO & PENNY, P.C.
Eight Tower Bridge, Suite 1025
161 Washington Street
Conshohocken, PA 19428
(484) 342-0700

GOLDMAN SCARLATO & PENNY, P.C., concentrates its practice in complex litigation involving violations of federal and state securities, consumer-protection and antitrust laws, and litigates cases in federal and state courts throughout the country. The Firm has played a prominent role in many of the leading cases in these fields and is currently serving as lead or co-lead counsel in *Leibovic v. United Shore Financial Services, LLC*, 15-cv-12639 (E.D. Mich. 2015) (alleging failure to protect customers' private data and information); *In re Class 8 Truck Transmission Indirect Purchaser Antitrust Litigation*, 11-cv-00009 (D. Del. 2009) (alleging an antitrust conspiracy in the market for linehaul truck transmissions); *Kaufman v. CVS Caremark Corp*., 14-cv-00216 (D. R.I. 2014) (alleging false and misleading statements in the sale and packaging of vitamin E); *Bradach v. Pharmavite*, 14-cv-03218 (C.D. Cal.) (alleging false and misleading statements in the sale and packaging of vitamin E), *Spence v. Basic Research LLC, et al.*, 14-cv-4945 (S.D.N.Y.) (alleging false advertising of weight loss pills); *Afzal v. BMW of North America, LLC*, Case No. 15-08009 (D.N.J.) (alleging product defect leading to catastrophic engine failure), and *Yao Yi Liu v. Wilmington Trust Company*, 14-cv-06631 (W.D.N.Y) (alleging breach of fiduciary duty and aiding and abetting a Ponzi scheme).

The Firm is also serving as one of class counsel in several other prominent class actions, including: *In re Intuit Data Litigation*, 15-cv-1778 (N.D. Cal. 2015) (executive committee member); *In re Nexium (Esomeprazole) Antitrust Litigation* (D. Mass. 2012) (executive committee member); *In Re NHL Concussion Litigation* (D. Minn. 2014) (executive committee

member); *In re Community Health Systems, Inc. Customer Data Security Breach Litigation*, 15-cv-222 (N.D. Ala. 2015) (executive committee member); *In re Target Corporation Customer Data Security Breach Litig.* (D. Minn. 2014) (complaint committee); *In re Air Cargo Antitrust Litigation* (E.D.N.Y. 2006) (co-chair of the expert's committee); *In re Aftermarket Automotive Products Antitrust Litigation* (E.D. Mich. 2012); and *In re Ductile Iron Pipe Fittings (DIPF) Direct Purchaser Antitrust Litigation* (D.N.J. 2012).

The Firm has played prominent roles in numerous other class actions, including: *In re Air Cargo Antitrust Litigation* (co-chair of the expert's committee; partial settlements of over $1 billion); *In re Vitamins Antitrust Litigation* (settlements of over $1.7 billion); *In re NASDAQ Antitrust Litigation* (settlements totaling $1.1 billion); and *In re Brand Name Prescription Drugs Antitrust Litigation* (settlements of approximately $700 million).

THE FIRM'S SHAREHOLDERS

MARK S. GOLDMAN. Since 1986, Mark Goldman has concentrated his practice in many different types of complex litigation, including cases involving violations of the federal securities and antitrust laws and state consumer protection statutes. Mr. Goldman served as co-lead counsel in a number of class actions brought against life insurance companies, challenging the manner in which premiums are charged during the first year of coverage. In the antitrust field, Mr. Goldman litigated several cases that led to recoveries exceeding $1 billion each, for the benefit of the consumers and small businesses he represented, including *In re Air Cargo Antitrust Litigation*, Case No. 06-MD-1775 (E.D.N.Y. 2016), *In re Vitamins Antitrust Litigation*, MDL No. 1285 (D.D.C. 1999), *In re NASDAQ Antitrust Litigation*, Case No. 94-cv-3996 (S.D.N.Y. 1994), and *In re Brand Name Prescription Drugs Antitrust Litigation*, Case No. 94-c-897 (N.D. Ill. 1994). Mr. Goldman currently represents numerous victims of identity theft seeking to hold

accountable companies that failed to protect the safety of private data maintained on their networks, including *In re Community Health Systems, Inc. Customer Data Security Breach Litigation*, 15-cv-222 (N.D. Ala. 2015), *In re Anthem, Inc. Data Breach Litigation*, Case No. 15-MD-02617-LHK (N.D. Cal. 2015), *In re Intuit Data Litigation*, 15-cv-1778 (N.D. Cal. 2015), and *In re Medical Informatics Engineering, Inc. Customer Data Security Breach Litigation*, MDL No. (N.D. Ind. 2015). In the area of securities litigation, Mr. Goldman played a prominent role in class actions brought under the antifraud provisions of the Securities Exchange Act of 1934, including *In re Nuskin Enterprises, Inc. Securities Litigation*, Master File No. 2:14-cv-00033 (D. Utah 2014), *In Re: Spectrum Pharmaceuticals, Inc. Securities Litigation*, Case No. 2:13-cv-00433 (D. Nev. 2013), and *In re Omnivision Technologies, Inc. Litigation*, Case No.: 5:11-cv-05235 (N.D. Cal. 2011). Mr. Goldman also prosecuted a number of insider trading cases brought against company insiders who, in violation of Section 16(b) of the Securities Exchange Act of 1934, engaged in short swing trading.

Mr. Goldman earned his undergraduate degree from the Pennsylvania State University in 1981 and his law degree from the University of Kansas School of Law in 1986. He is a member of the Pennsylvania bar.

PAUL J. SCARLATO. Paul Scarlato has concentrated his practice on the litigation of complex class actions since 1989. He has litigated numerous cases under the securities, consumer, antitrust and common law involving companies in a broad range of industries, and has litigated many cases involving financial and accounting fraud.

In securities fraud cases, Mr. Scarlato was one of three lead attorneys for the class in *Kaufman v. Motorola, Inc.*, a securities fraud class action that settled just weeks before trial, and along with Mr. Weinstein of his predecessor firm, was lead counsel in *Seidman v. American Mobile*

Systems, Inc., (E.D. Pa.), a securities class action that resulted in a settlement for the plaintiff class again on the eve of trail. Mr. Scarlato served as co-lead counsel in *In re: Corel Corporation Securities Litigation* (E.D. Pa.). Mr. Scarlato is currently one of the lead lawyers in *Leibovic v. United Shore Financial Services; Afzal v. BMW of North America, LLC,* and *Yao Yi Liu v. Wilmington Trust Company.* He is also counsel in *In re Platinum and Palladium Antitrust Litigation*, Case No. 14-cv-09391 (S.D.N.Y), *In re Treasury Securities Auction Antitrust Litigation*, Case No. 15-md-02673 (S.D.N.Y.), and *In re Liquid Aluminum Sulfate Antitrust Litigation*, Case No. 15-7827 (D.N.J.).

Mr. Scarlato graduated from Moravian College in 1983 with a degree in accounting, and received his Juris Doctor degree from the Widener University School of Law in 1986. Mr. Scarlato served as law clerk to the Honorable Nelson Diaz, of the Court of Common Pleas of Philadelphia County, and thereafter as law clerk to the Honorable James T. McDermott, Justice of the Pennsylvania Supreme Court. After his clerkships, and prior to becoming a litigator, Mr. Scarlato was a member of the tax department of a major accounting firm where he provided a broad range of accounting services to large business clients in a variety of industries.

Mr. Scarlato is a member of the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and those of various federal district and circuit courts.

BRIAN D. PENNY. Since joining the Firm in 2002, Mr. Penny has focused his practice on class action litigation principally in the areas of antitrust, consumer protection and securities fraud litigation. He was lead counsel in *Mirakay v. Dakota Growers Pasta Co.* (D.N.J. 2013) (alleging false and misleading advertising of pasta products and resulting in a settlement valued at over $23 million); *Logue v. West Penn Multi-Listing Service* (W.D. Pa. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in $2.75 million settlement); *Allan*

v. Realcomp II (E.D. Mich. 2010) (alleging price-fixing among brokers and multi-listing service and resulting in a $3.25 million settlement*); Boland v. Columbia Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service and resulting in a $1 million settlement); *Robertson v. Hilton-Head Multi-Listing Service* (D.S.C. 2009) (alleging price-fixing among brokers and multi-listing service).

Mr. Penny is currently serving as lead or interim co-lead counsel in *In re Class 8 Truck Transmission Indirect Purchaser Antitrust Litigation*, 11-cv-00009 (D.Del. 2009) (alleging antitrust conspiracy in the market for linehaul truck transmissions); *Kaufman v. CVS Caremark Corp*., (D. R.I. 2014) (alleging false and misleading advertising of vitamin E); *Bradach v. Pharmavite, et. al.* (C.D. Cal. 2014) (alleging false and misleading advertising of vitamin E) and *Spence v. Basic Research LLC, et al.*, 14-cv-4945 (S.D.N.Y.) (alleging false advertising of weight loss pills). Mr. Penny is currently serving on the executive committees in *In re Nexium (Esomeprazole) Antitrust Litigation* (D. Mass. 2012) (alleging generic suppression claims on behalf of end-payors), *In Re NHL Concussion Litigation* (D. Minn. 2014) (alleging league failed to protect players from known risks of concussions), and *In re: Community Health Systems, Inc., Customer Security Data Breach Litigation* (N.D. Ala. 2015) (alleging damages caused by data breach of health care records). He is also on the Third Party Discovery Committee in *In re Disposable Contact Lenses Antitrust Litigation*, 15-md-2626 (M.D. Fla.), and is actively engaged as class counsel in *In re Ductile Iron Pipe Fittings (DIPF) Direct Purchaser Antitrust Litigation* (D.N.J. 2012) (alleging price fixing in the market for DIPF); and *In re Target Corporation Customer Data Security Breach Litig.* (D. Minn. 2014) (alleging damages stemming from massive data breach).

Mr. Penny has also prosecuted numerous securities fraud class actions over the course of his career. He was a key member of the plaintiffs' teams that prosecuted *In re Broadcom Securities Litigation*, which resulted in a settlement of $150 million for the class, and *AOL Time Warner Securities Litigation*, which resulted in a settlement of over $2.5 billion for investors. Mr. Penny was also one of the lead attorneys representing the classes in a number of securities fraud actions arising out of stock option backdating, including, *In re Monster Worldwide, Inc. Securities Litigation* ($47.5 million settlement), *In re Mercury Interactive Securities Litigation* ($117.5 million settlement) , *In re SafeNet, Inc. Securities Litigation* ($25 million settlement), *Ramsey v. MRV Communications et al.* ($10 million settlement), and *In re Semtech Securities Litigation* ($20 million settlement).

Mr. Penny received his Bachelor of Arts degree from Davidson College, Davidson, North Carolina, in 1997 and earned his Juris Doctor degree from Pennsylvania State University in 2000. After graduating from law school, Mr. Penny served as law clerk to the Honorable John T.J. Kelly, Jr., Senior Judge of the Superior Court of Pennsylvania. He has been named a Super Lawyer or Rising Star each year since 2010. In 2015, Mr. Penny was one of four finalists for the American Antitrust Institute's Enforcement Award for Outstanding Antitrust Litigation Achievement by a Young Lawyer for his work on *Allen, et al. v. Realcomp Ltd., et al.*

THE FIRM'S ASSOCIATES

LAURA KILLIAN MUMMERT. Ms. Mummert earned her Bachelor of Science degree from the Pennsylvania State University and her Juris Doctor from the Dickinson School of Law of the Pennsylvania State University. She practices primarily in the areas of securities-fraud and consumer class action litigation. Currently, she is prosecuting consumer fraud actions involving unauthorized charges for frequent flier miles by car rental companies; misleading statements in

the sale of vitamin E, antitrust cases in markets for automotive sheetmetal and truck transmission, and a securities-fraud class action against a biotech company alleged to have misrepresented the status of clinical trials concerning two of its flagship products and a securities fraud class action against a worldwide publisher, developer and distributor of interactive entertainment software alleged to have misrepresented the content of one of its video games and accused of stock options backdating. During law school, Ms. Mummert authored, *Concerned or Just Plain Nosy? The Consequences of Parental Wiretapping Under the Federal Wiretap Act in Light of Pollock v. Pollock*, 104 DICK. L. REV. 561 (2000).

DOUGLAS J. BENCH, JR. Mr. Bench earned his Bachelor of Arts degree from the University of Pittsburgh and his Juris Doctor from Cornell Law School. Prior to joining the Firm in 2012, Mr. Bench served as a Death Penalty Law Clerk for the U.S. District Court in the Western District of Pennsylvania from 2010-2012. He was in private practice from 2008-2010 in Johnstown, Pennsylvania, and taught undergraduate macro and micro economics at the University of Pittsburgh, Johnstown campus, from 2006-2008.

As a result of his economics background, Mr. Bench is naturally interested in antitrust violations, consumer fraud, and the market inefficiencies these violations engender. Mr. Bench primarily focuses on antitrust and consumer class actions. Representative cases include: *Kaufman v. CVS Caremark Corp.*, (D. R.I. 2014) (alleging consumer protection violations); *Weintraub v. Pharmavite*, (C.D. Cal. 2014) (same); *Mirakay v. Dakota Growers Pasta Co., Inc.* (D. N.J. 2013) (alleging unfair trade practices and false advertising); *In re Nexium (Esomeprazole) Antitrust Litigation* (D. Mass. 2012) (alleging generic suppression claims on behalf of end-payors); *In re Ductile Iron Pipe Fittings (DIPF) Direct Purchaser Antitrust Litigation* (D.N.J. 2012) (alleging price fixing in the market for DIPF); *Allan v. Realcomp II*

(E.D. Mich. 2010) (alleging antitrust violations) ($3.25M settlement pending approval); *Boland v. Columbia Multi-Listing Service* (D.S.C. 2009) (antitrust) ($1M settlement); *Robertson v. Hilton-Head Multi-Listing Service* (D.S.C. 2009) (antitrust) (settled on claims-paid basis).

Mr. Bench has authored the following law review articles: Douglas J. Bench, *Collateral Review of Career Offender Sentences: The Case for* Coram Nobis, 45 U. MICH. J. L. REFORM 155 (2011); Douglas J. Bench, *What Constitutes a Violent Felony After* Begay?, 67 J. MO. B. 209 (2011).

EXHIBIT B

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

Firm Name: Goldman Scarlato & Penny, P.C.

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Daniel R. Karon (P)							1.50				0.80				2.30	$690.00	$1,587.00
Robert W. Biela							468.20								468.20	$350.00	$163,870.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**469.70**	**0.00**	**0.00**	**0.00**	**0.80**	**0.00**	**0.00**	**0.00**	**470.50**		**$165,457.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**469.70**	**0.00**	**0.00**	**0.00**	**0.80**	**0.00**	**0.00**	**0.00**	**470.50**		**$165,457.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Goldman Scarlato & Penny , P.C.

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Daniel R. Karon	1/1/2013 – 12/31/2013	$680
Daniel R. Karon	1/1/2014 – 12/31/2014	$690
Robert W. Biela	1/1/2014 – 1/24/2015	$350
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

EXHIBIT D

Lithium Ion Batteries Antitrust Lititation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Timekeeper: Biela					
Indirect Batteries	Biela	10/23/2014	Document discovery - Review case materials and sign confidentiality agreement	5.50	$1,925.00
Indirect Batteries	Biela	10/28/2014	Document discovery - Conference call and review case materials	3.00	$1,050.00
Indirect Batteries	Biela	10/29/2014	Document discovery - Set up review platform and T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	10/30/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	7.50	$2,625.00
Indirect Batteries	Biela	10/31/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	6.00	$2,100.00
Indirect Batteries	Biela	11/3/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	7.00	$2,450.00
Indirect Batteries	Biela	11/4/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	8.00	$2,800.00
Indirect Batteries	Biela	11/5/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	7.00	$2,450.00
Indirect Batteries	Biela	11/6/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	6.50	$2,275.00
Indirect Batteries	Biela	11/7/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	6.50	$2,275.00
Indirect Batteries	Biela	11/8/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	4.00	$1,400.00
Indirect Batteries	Biela	11/9/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	3.50	$1,225.00
Indirect Batteries	Biela	11/10/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	11/11/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	5.30	$1,855.00
Indirect Batteries	Biela	11/12/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	1.50	$525.00
Indirect Batteries	Biela	11/13/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	6.50	$2,275.00

EXHIBIT D

Lithium Ion Batteries Antitrust Lititation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Indirect Batteries	Biela	11/14/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	7.20	$2,520.00
Indirect Batteries	Biela	11/15/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	4.00	$1,400.00
Indirect Batteries	Biela	11/17/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	11/18/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	7.50	$2,625.00
Indirect Batteries	Biela	11/19/2014	Document discovery - T1 review and code Sony documents produced to DOJ per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	11/20/2014	Document discovery - T1 review and code of "Panasonic English" batch documents assigned to me by lead counsel; elevated toT2 status; T2 review and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	4.50	$1,575.00
Indirect Batteries	Biela	11/21/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.50	$2,625.00
Indirect Batteries	Biela	11/23/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	3.00	$1,050.00
Indirect Batteries	Biela	11/24/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	8.00	$2,800.00
Indirect Batteries	Biela	11/25/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	7.00	$2,450.00
Indirect Batteries	Biela	11/26/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	5.80	$2,030.00
Indirect Batteries	Biela	11/28/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.20	$2,520.00
Indirect Batteries	Biela	11/29/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	6.00	$2,100.00

EXHIBIT D

Lithium Ion Batteries Antitrust Litigation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Indirect Batteries	Biela	11/30/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	2.00	$700.00
Indirect Batteries	Biela	12/1/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	5.00	$1,750.00
Indirect Batteries	Biela	12/2/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	5.00	$1,750.00
Indirect Batteries	Biela	12/3/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.00	$2,450.00
Indirect Batteries	Biela	12/4/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.00	$2,450.00
Indirect Batteries	Biela	12/5/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.50	$2,625.00
Indirect Batteries	Biela	12/6/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	4.50	$1,575.00
Indirect Batteries	Biela	12/7/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	3.00	$1,050.00
Indirect Batteries	Biela	12/8/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	8.00	$2,800.00
Indirect Batteries	Biela	12/9/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.; conference call with lead counsel re hot docs, review progress, other issues re production	7.70	$2,695.00
Indirect Batteries	Biela	12/10/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	6.00	$2,100.00
Indirect Batteries	Biela	12/11/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.00	$2,450.00
Indirect Batteries	Biela	12/13/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	5.00	$1,750.00

EXHIBIT D

Lithium Ion Batteries Antitrust Litigation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Indirect Batteries	Biela	12/14/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	1.50	$525.00
Indirect Batteries	Biela	12/15/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.50	$2,625.00
Indirect Batteries	Biela	12/16/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	7.00	$2,450.00
Indirect Batteries	Biela	12/17/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	7.20	$2,520.00
Indirect Batteries	Biela	12/18/2014	Document discovery - [redacted] and code of "Sony English Second" set docs producted to DOJ per batches assigned to me by lead counsel.	8.00	$2,800.00
Indirect Batteries	Biela	12/19/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	7.00	$2,450.00
Indirect Batteries	Biela	12/20/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	1.00	$350.00
Indirect Batteries	Biela	12/21/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	2.00	$700.00
Indirect Batteries	Biela	12/22/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	7.50	$2,625.00
Indirect Batteries	Biela	12/23/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel; conference call with lead counsel re hot docs, review progress, other issues re production	8.00	$2,800.00
Indirect Batteries	Biela	12/24/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	6.50	$2,275.00
Indirect Batteries	Biela	12/26/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	12/27/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	6.00	$2,100.00
Indirect Batteries	Biela	12/28/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	4.50	$1,575.00
Indirect Batteries	Biela	12/29/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	6.00	$2,100.00

EXHIBIT D

Lithium Ion Batteries Antitrust Lititation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Indirect Batteries	Biela	12/30/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	8.00	$2,800.00
Indirect Batteries	Biela	12/31/2014	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	6.00	$2,100.00
Indirect Batteries	Biela	1/2/2015	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	7.00	$2,450.00
Indirect Batteries	Biela	1/3/2015	Document discovery - [redacted] and code of Sony liabiliy docs per batches assigned to me by lead counsel	4.00	$1,400.00
Indirect Batteries	Biela	1/5/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0002 and Sony E Complaint - 0003	6.00	$2,100.00
Indirect Batteries	Biela	1/6/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0002 and Sony E Complaint - 0003; attend weekly status conference	6.00	$2,100.00
Indirect Batteries	Biela	1/7/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0002 and Sony E Complaint - 0003	6.00	$2,100.00
Indirect Batteries	Biela	1/8/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0002 and Sony E Complaint - 0003; emails to/from lead counsel re technical issues	6.00	$2,100.00
Indirect Batteries	Biela	1/9/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0002 and Sony E Complaint - 0003	8.00	$2,800.00
Indirect Batteries	Biela	1/12/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016; email to lead counsel re same	8.00	$2,800.00
Indirect Batteries	Biela	1/13/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016; attend weekly status conference	6.30	$2,205.00
Indirect Batteries	Biela	1/14/2015	Document discovery - T2 review and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016	8.00	$2,800.00
Indirect Batteries	Biela	1/15/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016; emails to/from lead cousel re coding procedures	7.00	$2,450.00
Indirect Batteries	Biela	1/16/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016	8.00	$2,800.00
Indirect Batteries	Biela	1/18/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016	7.50	$2,625.00
Indirect Batteries	Biela	1/20/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016; attend weekly status conference	8.00	$2,800.00

EXHIBIT D

Lithium Ion Batteries Antitrust Lititation
Goldman Scarlato & Penny, P.C.
Time Report
June 1, 2013 through February 28, 2017

Client	Attorney	Date	Description	Hours	Value
Indirect Batteries	Biela	1/22/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016	10.50	$3,675.00
Indirect Batteries	Biela	1/23/2015	Document discovery - [redacted] and code Sony documents - Batches Sony E Complaint - 0015 and Sony E Complaint - 0016; [redacted]	5.00	$1,750.00
Indirect Batteries	Biela	1/24/2015	Document discovery - [redacted] and code Sony documents - finish Batches Sony E Complaint - 0015 and Sony E Complaint - 0016	3.00	$1,050.00
Total: Biela				468.20	$163,870.00
Timekeeper: Karon					
Indirect Batteries	Karon	7/1/2013	Case Management/Strategy - Read and review email from lead counsel	0.20	$138.00
Indirect Batteries	Karon	1/23/2014	Case Management/Strategy - read and review email from lead counsel; email co-counsel	0.20	$138.00
Indirect Batteries	Karon	4/16/2014	Case Management/Strategy - Read and review letter from lead counsel; email lead counsel	0.20	$138.00
Indirect Batteries	Karon	8/11/2014	Document discovery - Set up document review; telephone conference with lead counsel; telephone conference with co-counsel	1.50	$1,035.00
Indirect Batteries	Karon	9/19/2014	Case Management/Strategy - Read and review letter from lead counsel	0.20	$138.00
Total: Karon				2.30	$1,585.00
Grand Total				470.50	$165,457.00

EXHIBIT 25

Robert S. Green (State Bar No. 136183)
James Robert Noblin (State Bar No. 114442)
GREEN & NOBLIN, P.C.
2200 Larkspur Landing Circle, Suite 101
Larkspur, California 94939
Telephone: (415) 477-6700
Facsimile: (415) 477-6710
Email: gnecf@classcounsel.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ROBERT S. GREEN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GREEN & NOBLIN, P.C.**

I, ROBERT S. GREEN, declare:

1. I am the Managing Partner of Green & Noblin, P.C., Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Sheri Harmon, Christopher Hunt, the cities of Richmond and Palo Alto and the City College of San Francisco as counsel for IPPs throughout the course of this litigation. The background and experience of Green & Noblin, P.C. and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Green & Noblin, P.C., performed the following work: Green & Noblin was appointed by the Court to serve on the Executive Committee leading the case. Working together with the firm of Renne Sloan, Green & Noblin investigated and brought claims on behalf of several government agencies, including the cities of Palo Alto and Richmond, City College of San Francisco and others. In this context, we coordinated with representatives of the California Attorney General's office who were pursuing separate complementary claims on behalf of governments. In that role, we briefed and argued oppositions to motions to dismiss claims.

(a) Green & Noblin represents individual clients in Oregon and Arizona, who in turn represent the classes in their states. In this context, we worked extensively on responding to individual interrogatories, document requests and deposition notices. We worked with these clients to present their documents, including participation of third party searches into their email

systems and the like. The interrogatories were overbroad and overbearing, but responded to in full, some of them multiple times.

(b) Green & Noblin also participated in document review procedures for both English and Japanese documents. This included review of documents from Sony, Samsung SDI, Panasonic, Toshiba and others. It also involved preparation for deposition of persons like H. Kubo, of Toshiba, K. Takeshima of NEC and others, as well as pulling data from the productions for use by experts.

(c) Finally, we reviewed settlement agreements and communicated with our clients regarding the nature and terms of the settlements to ensure they were in the best interest of the clients and the class.

5. A summary of work performed by Green & Noblin, P.C., and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Robert S. Green in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Green & Noblin, P.C., and filed on May 26, 2017. (ECF No. 1813-17]. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Green & Noblin, P.C., since June 1, 2013 was 1,825.40, with a corresponding lodestar of $828,960 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses Green & Noblin, P.C., has incurred from June 1, 2013 to present, plus applicable case filing fees. Green & Noblin, P.C., expended a total of $54,797.84 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Green & Noblin, P.C., on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Green & Noblin, P.C., in this case which are included in this declaration, and I affirm that they are

true and accurate.

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

Executed on April 10, 2019 at Larkspur, California.

/s/ Robert S. Green

Robert S. Green

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

G&N CLASSCOUNSEL.COM

GREEN & NOBLIN, P.C.

FIRM RESUME

Litigation Approach

The Firm's business strategy is to aggressively develop and pursue opportunities in the field of class action litigation. The Firm's principals have many years of experience prosecuting class action claims relating to antitrust violations, consumer protection, truth in lending practices, financial services, securities offerings, accounting malpractice, breach of fiduciary duties of corporate officers and directors, and products liability.

The aggressive, result-oriented approach to client representation applied by the Firm and its principals has been demonstrated in the following litigation:

- *John Doe v. SuccessfulMatch.com*, Case No. 1-22-CV-21120, Superior Court of Santa Clara County. Robert Green served as the Lead Trial Counsel in this class action asserting claims under California's UCL and CLRA statutes. In October 2014, a jury awarded the plaintiffs approximately $1.5 million in compensatory damages and $15 million in punitive damages. The Court entered judgment on the verdict and added injunctive and declaratory relief. The case later settled as part of a nationwide class in which class members received over 100% of their asserted damages.

- *In re TFT-LCD (Flat Panel) Antitrust Litigation*, Case No. 07-mdl-1827 SI. The Firm served a critical role developing the evidence that lead to a $1.1 billion settlement in this indirect purchaser antitrust class action settled earlier this year. Members of the Firm were involved in all phases of the litigation over a five-year period, including research and drafting of our initial complaint and later motions and pleadings, managing document review and deposition preparation teams, and identifying and organizing exhibits and other evidence for trial.

- *In re Lithium Ion Batteries Antitrust Litigation,* Case No. 13-md-2420 YGR. The Firm was selected by the Court to serve on the Steering Committee for indirect purchasers' counsel following a litigated selection process. The Firm represents the cities of Palo Alto and Richmond, California, among other purchasers of the affected products.

- *In re Domestic Drywall Antitrust Litigation,* Case No. 13-md-2437. The Firm was appointed Co-Lead Counsel for indirect purchasers in this multi-district litigation pending in Philadelphia.

- *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation,* 02-mdl-1486 PJH. The Firm worked extensively on this indirect purchaser antitrust action, both in San Francisco Superior Court in a coordinated action, and in the federal antitrust action. Principals of the Firm were active in conducting depositions, such as Dell and Nanya executives among others, along with conducting legal and factual research, drafting significant pleadings and running document review teams. The case settled for in excess of $300 million.

- *In re Static Random Access Memory (SRAM) Antitrust Litigation,* Case No. 07-mdl-1819 CW. The Firm participated in all phases of this direct purchaser class action from researching and drafting complaints up through and including final trial preparations. The case settled for approximately $75 million just days before trial.

- *In re Chase Bank USA, N.A. "Check Loan Litigation.* The Firm served on the Executive Committee running this national MDL proceeding in which JPMorgan Chase & Co., the nation's largest issuer of credit cards, agreed to settle for $100 million. The case is a class action lawsuit charging that the bank acted improperly when it more than doubled the minimum monthly payment requirement for over 1 million customers who entered into balance transfer loans with "fixed" interest rates. The Court approved the final settlement on November 19, 2012. The Firm was active in prosecuting the action, from origination, through motions, fact discovery, expert discovery, summary judgment and trial preparation. *See In re: Chase Bank, USA, N.A. "Check Loan" Contract Litigation*, 274 F.R.D. 286 (N.D. Cal. 2011).

- *Hellum v. Breyer (Prosper Marketplace, Inc.) Unregistered Securities Litigation.* Green & Noblin serve as counsel for the class in this action asserting the sale of unregistered securities. The action settled for $10 million in 2014. The court certified a class of approximately 50,000 purchasers of loan notes from Prosper Marketplace, Inc. and denied summary judgment. At the time of settlement, we were preparing for an imminent trial. The Firm's work resulted in a ruling by the Court of Appeal clarifying the pleading requirements for controlling officers and directors under both California and federal securities laws. *See, Hellum v. Breyer*, 194 Cal.App.4th 1300 (2011).

- *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917, Case No. 07-5944 SC. The Firm served on document review and deposition preparation teams for this indirect purchaser class action case in the Northern District of California. The case settled in 2015 for over $500 million.

- *In re Textainer Partnership Securities Litigation*. Robert Green served as Lead Trial Counsel in these consolidated cases. The cases settled for $10 million after Plaintiffs obtained a ruling in their favor at the conclusion of Phase 1 of the trial in San Francisco Superior Court. The Plaintiffs asserted breach of fiduciary duty claims in connection with a sale of assets transaction that resulted in the dissolution of six limited partnerships.

- *McKesson Inc. Derivative Litigation.* McKesson-HBOC, Inc. lost $9 billion in stock market capitalization in one day during April 1999 after announcing that prior financial statements would be restated due to accounting errors. Rather than pursuing the individuals and companies who participated in the conduct that led to the accounting

restatements, the company sued its own shareholders in a case that was promptly dismissed by the Ninth Circuit U.S. Court of Appeals. As co-counsel for plaintiff shareholders seeking to recover money on behalf of the corporation from the wrongdoers, the Firm obtained an important decision from the Delaware Supreme Court expanding the rights of shareholders to obtain and inspect corporate documents where there is a proper purpose for investigating potential wrongdoing. *See Saito v. McKesson HBOC, Inc.*, 806 A.2d 113 (Del. Supr. 2002). A substantial settlement on behalf of the Company was approved by the Delaware Chancery Court on February 12, 2006.

- *In re Providian Credit Card Cases*. Robert Green was appointed co-lead counsel in this national class action brought on behalf of Providian credit card customers who were improperly charged late fees, higher interest rates on balance transfers, and fees for add-on products, including Credit Protection, PricePro, Drive Pro, HealthPro, and credit line increases. The San Francisco Superior Court approved a settlement for $105 million, which covered restitution to Providian customers, "in-kind" payments to customers, and the costs and expenses of the litigation.

Attorneys

Robert S. Green litigates cases of national import across a spectrum of subjects. In antitrust litigation, Mr. Green was named to the Steering Committee of the Lithium Ion Batteries Indirect Purchaser Litigation, and served on important discovery and trial preparation roles in the SRAM, DRAM, and LCD-TFT Thin Film Transistor class actions. In credit card class actions, Mr. Green was one of the Lead Counsel in the Chase Bank "Check Loans" Litigation which settled for $100 million in 2012 and in the Providian Credit Card Cases that settled for $75 million in 2001. Mr. Green successfully argued the Ninth Circuit Appeal in DeMando v. Capital One Bank. In securities litigation, Mr. Green has been named Lead Counsel by state and federal courts from California to New York, participated in or served as lead counsel in three trials, two of which lasted six months, and obtained settlements of $35.75 million for Securities Act claims in the STEC Securities Litigation, $10 million for unregistered securities claims in the Prosper Marketplace Litigation, and $10 million for limited partner claims in the Textainer Limited Partners Securities Litigation. In consumer and defective product cases, Mr. Green was a key member of the trial team in a three month trial against Ford Motor Company in connection with Ford Explorer/Firestone Tire Rollover Litigation that resulted in a substantial settlement at the conclusion of the trial. Mr. Green also successfully prosecuted defective computer claims against HP and Toshiba, defective software claims against Sony, defective dashboard electronics claims against Audi and internet fraud claims against Webloyalty.com.

Mr. Green is AV Preeminent Peer Review Rated by Martindale-Hubbell and was named a finalist for Consumer Attorney of the Year in 2013 by the Consumer Attorneys of California in connection with his work on the Chase Bank "Check Loans" Litigation. Mr. Green is recognized as one of the "Super Lawyers" of Northern California. Mr. Green graduated with honors from the University of the Pacific, McGeorge School of Law in 1984. He received his Masters of Business Administration degree from California State University-Sacramento in 1989 and his undergraduate degree with distinction from Oregon State University in 1981. Mr. Green is an active member of the National Association of Consumer Attorneys (NACA). Mr. Green is an Editorial Advisor for the Consumer Financial Services Law Report and is on the Partners' Council for the National Consumer Law Center. Mr. Green also served on the Board of Marin AIDS Interfaith Network. Publications by Mr. Green include Developments in Credit Card

Litigation, published by the Review of Banking and Financial Services; and Litigating Credit Card Cases, published by the Consumer Advocate. Mr. Green is licensed to practice in California.

James Robert Noblin has practiced complex business litigation since 1984, focusing primarily on antitrust and unfair competition cases. Mr. Rob Noblin graduated from Harvard Law School *cum laude* in 1983. He received his undergraduate degree *summa cum laude* from the University of Southern California in 1980. After graduating from law school, Mr. Noblin was a law clerk for the Honorable William A. Norris of the United States Court of Appeals for the Ninth Circuit from 1983 - 1984.

Mr. Noblin has tried over 10 cases to a jury as either the lead or a principal trial lawyer, including the six-week trial resulting in a verdict of over $ 70 million that was upheld in *Image Tech. Services, Inc. v. Eastman Kodak Co.,* 125 F.3d 1195 (9th Cir. 1997). His other representative cases include: . *In re Domestic Drywall Antitrust Litig*., 163 F. Supp. 3d 175 (E.D. Pa. 2016), Fun v. Leapfrog Enters., No. CV 09-916-GHK (VBXx), 2010 U.S. Dist. LEXIS 146641 (C.D. Cal. Sep. 10, 2010), *Newcal Indus., Inc. v. Ikon Office Solution*, 513 F.3d 1038, 1043 (9th Cir. 2008) *ABC Int'l Traders, Inc. v. Matsushita Elec. Corp.*, 14 Cal. 4th 1247, 931 P.2d 290 (1997); *Knevelbaard Dairies v. Kraft Foods, Inc.*, 232 F.3d 979 (9th Cir. 2000) *Brill Media Co., LLC v. TCW Group, Inc.*, 132 Cal. App. 4th 324, 33 Cal. Rptr. 3d 371 (2005); *Proctor v. Vishay Intertechnology Inc.*, 584 F.3d 1208 (9th Cir. 2009); *Am. Ad Mgmt., Inc. v. Gen. Tel. Co. of California*, 190 F.3d 1051, 1053 (9th Cir. 1999) *Consol. Credit Agency v. Equifax, Inc.*, CV-03-1229 CAS(CWX), 2005 WL 6218038 (C.D. Cal. Jan. 26, 2005); *Hanson v. Morgan Stanley Smith Barney, LLC*, 762 F. Supp. 2d 1201, 1209 (C.D. Cal. 2011); and *Lori Rubinstein Physical Therapy, Inc. v. PTPN, Inc*., 148 Cal. App. 4th 1130, 56 Cal. Rptr. 3d 351 (2007).

He also contributed to Chapter 20, *California Antitrust and Unfair Competition Law, Revised Edition*, published by the California State Bar Antitrust and Unfair Competition Section and has published articles on antitrust topics, including *United States v. AMR Corp. and Judicial Hostility Toward Predatory Pricing Cases,* Antitrust Report (Jan. 2002); *The Tumult in State Antitrust Law: Cel-Tech and the California Example in Little FTC Act Cases,* Antitrust Report (June 1999); and *The Confluence of Muddied Waters: Antitrust Consequential Damages and the Interplay of Proximate Cause, Antitrust Injury, Standing and Disaggregation*, 13 St. John's Journal of Legal Commentary 145 (1998).

Mika E. Otsubo graduated from Suffolk University Law School *cum laude* in 2005. She received her Bachelor of Arts in Mathematics in December 2001 from the University of California, Berkeley. Ms. Otsubo is bilingual in English and Japanese. After graduating from law school, Ms. Otsubo worked at various law firms specializing in research and document review in the United States. From 2010 thru 2015, Ms. Otsubo accepted a Vice President position in the Corporate Banking Compliance Unit at Citibank Japan, Ltd.

Raina S. Kim graduated from the University of Chicago Law School in 2007. She received her Bachelor of Arts *cum laude* in Film and Television Studies in 2003. Ms. Kim is fluent is English, Korean and conversational Spanish. While in Law School, Ms. Kim worked as Research Assistant to the Honorable Richard Posner, assisting in the completion of Judge Posner's Book, *Uncertain Shield: The U.S. Intelligence System in the Throes of Reform*.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
GREEN & NOBLIN, P.C.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	0.00
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	$2,500.00
Document Production	0.00
Experts/Consultants	0.00
Federal Express	$86.73
Transcripts (Hearing, Deposition, etc.)	$130.50
Investigation	0.00
Lexis/Westlaw	0.00
Messenger/Delivery	0.00
Photocopies – In House (capped at $0.20 per copy)	0.00
Photocopies – Outside	0.00
Postage	0.00
Service of Process	0.00
Supplies	0.00
Telephone/Telecopier	0.00
Travel	$2,080.61
Miscellaneous	0.00
TOTAL:	$54,797.84

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction Dat	6/1/2013 - 12/31/2016

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
98512 7/31/2013 WIP 6/20/13 Federal Express (PJ 2-319-98008)	EXP	C□ST oes BATT	1	27.02	27.02
98513 7/31/2013 WIP 6/20/13 Federal Express (PJ 2-319-98008)	EXP	C□ST oes BATT	1	40.46	40.46
98814 8/31/2013 WIP Federal Express 7/31/13 (PJ 236344105)	EXP	C□ST oes BATT	1	19.25	19.25
98831 8/31/2013 WIP Diane Skillman one transcript 7/12/13 (CDJ 2486)	EXP	C□ST dep BATT	1	59.40	59.40
99499 8/31/2013 WIP 7/22/13 L. Weaver meal re meeting with Eric Fastiff to discuss case status	EXP	C□ST mea BATT	1	27.00	27.00
99904 10/31/2013 WIP 9/26/13 L. Weaver parking meeting with E Fastiff re case strategy meeting with (JE1013cc-L. Weaver)	EXP	C□ST trl BATT	1	12.00	12.00
99903 10/31/2013 WIP 9/26/13 L. Weaver meal meeting with E Fastiff re case strategy meeting with (JE1013cc-L. Weaver)	EXP	C□ST mea BATT	1	34.00	34.00
100397 11/30/2013 WIP	EXP	C□ST trl BATT	1	22.52	22.52

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
10/29/13 L. Weaver mileage and tolls travel to SF for meeting with Louise Renne to discuss hearing preparation (PJ 102913 L. Weaver)					
100396 11/30/2013 WIP	EXP	C□ST trl BATT	1	9.00	9.00
10/29/13 L. Weaver parking travel to San Francisco for meeting with Louise Renne to discuss hearing preparation (JE1113cc-L. Weaver)					
100395 11/30/2013 WIP	EXP	C□ST mea BATT	1	66.00	66.00
10/29/13 L. Weaver lunch meeting travel to San Francisco with Louise Renne to discuss hearing preparation (JE1113cc-L. Weaver)					
101316 1/31/2014 WIP	EXP	C□ST trl BATT	1	14.00	14.00
12/6/13 L. Weaver parking meeting with Jennie Anderson, □akland liason counsel meeting re document collection (JE1213cc-L. Weaver)					
101313 1/31/2014 WIP	EXP	C□ST mea BATT	1	5.60	5.60
12/6/13 L. Weaver meal with Jennie Anderson, □akland liason counsel, meeting re document collection (JE1213cc-L. Weaver)					
101314 1/31/2014 WIP	EXP	C□ST mea BATT	1	71.00	71.00
12/6/13 L. Weaver meal with Jennie Anderson, □akland liason counsel, meeting re document collection (JE1213cc-L. Weaver)					
101372 2/28/2014 WIP	EXP	C□ST mea BATT	1	95.00	95.00
1/15/14 L. Weaver lunch mtg with Eric Fastiff re discuss municipalities (JE214cc-L. Weaver)					
101373 2/28/2014 WIP	EXP	C□ST trl BATT	1	24.00	24.00
2/7/14 L. Weaver parking re case mgmt conference (JE214cc-L. Weaver)					
101375 2/28/2014 WIP	EXP	C□ST mea BATT	1	36.00	36.00

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
1/23/14 L. Weaver lunch meeting with Jennie Anderson re preparation or upcoming hearing (JE214cc-L. Weaver)					
101376 2/28/2014 WIP	EXP	C□ST mea BATT	1	34.06	34.06
2/7/14 L. Weaver lunch preparation for case mgmt conference (JE214cc-L. Weaver)					
101440 3/31/2014 WIP	EXP	C□ST mea BATT	1	86.00	86.00
2/12/14 L. Weaver dinner meeting with Steve Cikes re meeting with IT mgr in Palo Alto (JE0314cc-L. Weaver)					
101437 3/31/2014 WIP	EXP	C□ST trl BATT	1	15.00	15.00
3/12/14 L. Weaver parking travel to San Francisco re meeting with Kathleen Foote asst attorney general (JE0314cc-L. Weaver)					
101441 3/31/2014 WIP	EXP	C□ST trl BATT	1	15.00	15.00
3/12/14 L. Weaver parking travel to San Francisco re lunch meeting with Dave Campos former head of San Francisco Unified School District (JE0314cc-L. Weaver)					
101439 3/31/2014 WIP	EXP	C□ST trl BATT	1	54.00	54.00
2/26/14 L. Weaver parking travel to San Francisco re CLE meeting with with Kathleen Foote (JE0314cc-L. Weaver)					
101438 3/31/2014 WIP	EXP	C□ST trl BATT	1	74.00	74.00
3/12/14 L. Weaver meal meeting with Dave Campos former head of San Francisco Unified School District to discuss municipal involvement in antitrust cases (JE0314cc-L. Weaver)					
101436 3/31/2014 WIP	EXP	C□ST trl BATT	1	17.63	17.63
3/12/14 L. Weaver mileage travel to San Francisco for meeting with asst atty general Kathleen Foote (PJ-31214)					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
102058 4/30/2014 WIP 2/12/14 L. Weaver mileage travel to Palo Alto re meeting with City of Palo Alto ITMgr (PJ L. Weaver 2-12-14)	EXP	C□ST trl BATT	1	55.37	55.37
102060 4/30/2014 WIP 3/19/14 L. Weaver and Jennifer Minton coffee meeting re Japanese/Korean speaking counsel (JE414cc-L. Weaver)	EXP	C□ST mea BATT	1	5.50	5.50
102006 5/31/2014 WIP 5/9/14 Diane Skillman one transcript (PJ 5158)	EXP	C□ST dep BATT	1	71.10	71.10
102007 5/31/2014 WIP 5/9/14 L. Weaver parking travel to San Francisco re hearing on motion to dismiss (JE514cc-L. Weaver)	EXP	C□ST trl BATT	1	14.00	14.00
102430 8/31/2014 WIP 7/18/14 L. Weaver and Eric Fastiff meal meeting re discussion of case status (JE814cc-L. Weaver)	EXP	C□ST mea BATT	1	94.00	94.00
102429 8/31/2014 WIP 8/8/14 L. Weaver lunch meeting with Jennie Anderson to discuss hearing on motions to dismiss (JE814cc-L. Weaver)	EXP	C□ST mea BATT	1	44.00	44.00
102428 8/31/2014 WIP 8/8/14 L. Weaver parking re hearing on motions to dismiss (JE814cc-L. Weaver)	EXP	C□ST trl BATT	1	14.00	14.00
102427 8/31/2014 WIP 7/18/14 L. Weaver ferry re travel to meeting with Eric Fastiff to discuss cases status (JE814cc-L. Weaver)	EXP	C□ST trl BATT	1	25.00	25.00

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
102599 10/31/2014 WIP 9/17/14 JRN and Raina Kim lunch meeting re case strategy GENJ je1014cc-jrn	EXP	C□ST mea BATT	1	96.66	96.66
104406 3/31/2015 WIP Batteries Indirect Purchaser Contribution - contribution to litigation fund.	EXP	C□ST lit BATT	1	50000.00	50000.00
105729 3/31/2016 WIP 3/8/16 R. Green meal travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST mea BATT	1	13.74	13.74
105727 3/31/2016 WIP 3/9/16 R. Green car rental travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST trl BATT	1	140.57	140.57
105726 3/31/2016 WIP 3/9/16 R. Green airport parking travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST trl BATT	1	32.00	32.00
105725 3/31/2016 WIP 3/9/16 R. Green lodging travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST lod BATT	1	153.00	153.00
105724 3/31/2016 WIP 3/8/16 R. Green meal travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST meatravel BATT	1	10.95	10.95
105723 3/31/2016 WIP 3/8/16 R. Green mileage and tolls travel to Portland, □R re deposition of Sheri Harmon.	EXP	C□ST trl BATT	1	38.45	38.45

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
105730	EXP	C□ST	1	605.96	605.96
3/31/2016		trl			
WIP		BATT			
3/8/16 R. Green airfare to Portland, □R re deposition of Sheri Harmon.					
105728	EXP	C□ST	1	25.60	25.60
3/31/2016		meatravel			
WIP		BATT			
3/8/16 R. Green and S. Harmon dinner travel to Portland, □R re deposition of Sheri Harmon.					
Total: 1284					
		Billable	0.00		52297.84
Grand Total					
		Billable	0.00		52297.84

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	96911 - 96911

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
96911	EXP	C□ST	1	350.00	350.00
1/31/2013		fil			
WIP		BATT			
1/11/13 Wheels of Justice, Inc re documents filed issued and returned (w2607171)					
Total: 1284					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00
Grand Total					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	96935 - 96935

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
96935	EXP	C□ST	1	350.00	350.00
12/31/2012		fil			
WIP		BATT			
12/18/12 Clerk USDC filing fee for complaint (CDJ 2078)					
Total: 1284					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00
Grand Total					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	96963 - 96963

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
96963	EXP	C□ST	1	350.00	350.00
1/31/2013		fil			
WIP		BATT			
Wheels of Justice, Inc 1/25/13 court service filing (W2607735)					
Total: 1284					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00
Grand Total					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	97517 - 97517

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
97517	EXP	C□ST	1	350.00	350.00
3/31/2013		fil			
WIP		BATT			
2/20/2013 Wheels of Justice court service (W2608925).					
Total: 1284					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00
Grand Total					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	97518 - 97518

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
97518	EXP	C□ST	1	350.00	350.00
3/31/2013		mes			
WIP		BATT			
3/28/2013 Wheels of Justice court service (W2610641).					
Total: 1284					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00
Grand Total					
		Billable	0.00		350.00
		Unbillable	0.00		0.00
		Total	0.00		350.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	97864 - 97864

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284					
97864	EXP	C□ST	1	400.00	400.00
5/31/2013		fil			
WIP		BATT			
Wheel of Justice 5/16/13 court (PJ W2613037)					
Total: 1284					
		Billable	0.00		400.00
		Unbillable	0.00		0.00
		Total	0.00		400.00
Grand Total					
		Billable	0.00		400.00
		Unbillable	0.00		0.00
		Total	0.00		400.00

Selection Criteria

Case.Selection	Include: BATT
Time.Selection	Include: C□ST
Slip.Transaction ID	106225 - 106225

Slip ID / Dates and Time / Status / Description	Timekeeper / Activity / Case	Units	Rate	Slip Value
Case: 1284				
106225 EXP	C□ST	1	350.00	350.00
12/31/2012	fil			
WIP	BATT			
12/4/2013 Clerk USDC filing fee for complaint (CDJ 2024) Actual slip no. 96933				
Total: 1284				
	Billable	0.00		350.00
	Unbillable	0.00		0.00
	Total	0.00		350.00
Grand Total				
	Billable	0.00		350.00
	Unbillable	0.00		0.00
	Total	0.00		350.00

EXHIBIT 26

Robert S. Green (State Bar No. 136183)
James Robert Noblin (State Bar No. 114442)
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Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ROBERT S. GREEN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GREEN & NOBLIN, P.C.**

I, ROBERT S. GREEN, declare:

1. I am the Managing Partner of Green & Noblin, P.C., Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Sheri Harmon, Christopher Hunt, the cities of Richmond and Palo Alto and the City College of San Francisco as counsel for IPPs throughout the course of this litigation. The background and experience of Green & Noblin, P.C. and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Green & Noblin, P.C., performed the following work: Green & Noblin was appointed by the Court to serve on the Executive Committee leading the case. Working together with the firm of Renne Sloan, Green & Noblin investigated and brought claims on behalf of several government agencies, including the cities of Palo Alto and Richmond, City College of San Francisco and others. In this context, we coordinated with representatives of the California Attorney General's office who were pursuing separate complementary claims on behalf of governments. In that role, we briefed and argued oppositions to motions to dismiss claims.

Green & Noblin represents individual clients in Oregon and Arizona, who in turn represent the classes in their states. In this context, we worked extensively on responding to individual interrogatories, document requests and deposition notices. We worked with these clients to present their documents, including participation of third party searches into their email systems

and the like. The interrogatories were overbroad and overbearing, but responded to in full, some of them multiple times.

Green & Noblin also participated in document review procedures for both English and Japanese documents. This included review of documents from Sony, Samsung SDI, Panasonic, Toshiba and others. It also involved preparation for deposition of persons like H. Kubo, of Toshiba, K. Takeshima of NEC and others, as well as pulling data from the productions for use by experts.

Finally, we reviewed settlement agreements and communicated with our clients regarding the nature and terms of the settlements to ensure they were in the best interest of the clients and the class.

5. Attached hereto as **Exhibit B** is a billing summary of Green & Noblin, P.C. total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Green & Noblin, P.C., during this period of time was 1,825.40, with a corresponding lodestar based on current rates of $828,960. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Green & Noblin, P.C.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Green & Noblin, P.C., has incurred during the course of this litigation. Green & Noblin, P.C., expended a total of $54,802.86 in unreimbursed costs and expenses in connection with the prosecution of this case.

These expenses were incurred on behalf of IPPs by Green & Noblin, P.C., on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Green & Noblin, P.C., in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Larkspur, California.

/s/ Robert S. Green

Robert S. Green

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

GREEN & NOBLIN, P.C.

FIRM RESUME

Litigation Approach

The Firm's business strategy is to aggressively develop and pursue opportunities in the field of class action litigation. The Firm's principals have many years of experience prosecuting class action claims relating to antitrust violations, consumer protection, truth in lending practices, financial services, securities offerings, accounting malpractice, breach of fiduciary duties of corporate officers and directors, and products liability.

The aggressive, result-oriented approach to client representation applied by the Firm and its principals has been demonstrated in the following litigation:

- *John Doe v. SuccessfulMatch.com*, Case No. 1-22-CV-21120, Superior Court of Santa Clara County. Robert Green served as the Lead Trial Counsel in this class action asserting claims under California's UCL and CLRA statutes. In October 2014, a jury awarded the plaintiffs approximately $1.5 million in compensatory damages and $15 million in punitive damages. The Court entered judgment on the verdict and added injunctive and declaratory relief. The case later settled as part of a nationwide class in which class members received over 100% of their asserted damages.

- *In re TFT-LCD (Flat Panel) Antitrust Litigation*, Case No. 07-mdl-1827 SI. The Firm served a critical role developing the evidence that lead to a $1.1 billion settlement in this indirect purchaser antitrust class action settled earlier this year. Members of the Firm were involved in all phases of the litigation over a five-year period, including research and drafting of our initial complaint and later motions and pleadings, managing document review and deposition preparation teams, and identifying and organizing exhibits and other evidence for trial.

- *In re Lithium Ion Batteries Antitrust Litigation,* Case No. 13-md-2420 YGR. The Firm was selected by the Court to serve on the Steering Committee for indirect purchasers' counsel following a litigated selection process. The Firm represents the cities of Palo Alto and Richmond, California, among other purchasers of the affected products.

- *In re Domestic Drywall Antitrust Litigation,* Case No. 13-md-2437. The Firm was appointed Co-Lead Counsel for indirect purchasers in this multi-district litigation pending in Philadelphia.

- *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*, 02-mdl-1486 PJH. The Firm worked extensively on this indirect purchaser antitrust action, both in San Francisco Superior Court in a coordinated action, and in the federal antitrust action. Principals of the Firm were active in conducting depositions, such as Dell and Nanya executives among others, along with conducting legal and factual research, drafting significant pleadings and running document review teams. The case settled for in excess of $300 million.

- *In re Static Random Access Memory (SRAM) Antitrust Litigation*, Case No. 07-mdl-1819 CW. The Firm participated in all phases of this direct purchaser class action from researching and drafting complaints up through and including final trial preparations. The case settled for approximately $75 million just days before trial.

- *In re Chase Bank USA, N.A. "Check Loan Litigation.* The Firm served on the Executive Committee running this national MDL proceeding in which JPMorgan Chase & Co., the nation's largest issuer of credit cards, agreed to settle for $100 million. The case is a class action lawsuit charging that the bank acted improperly when it more than doubled the minimum monthly payment requirement for over 1 million customers who entered into balance transfer loans with "fixed" interest rates. The Court approved the final settlement on November 19, 2012. The Firm was active in prosecuting the action, from origination, through motions, fact discovery, expert discovery, summary judgment and trial preparation. *See In re: Chase Bank, USA, N.A. "Check Loan" Contract Litigation*, 274 F.R.D. 286 (N.D. Cal. 2011).

- *Hellum v. Breyer (Prosper Marketplace, Inc.) Unregistered Securities Litigation.* Green & Noblin serve as counsel for the class in this action asserting the sale of unregistered securities. The action settled for $10 million in 2014. The court certified a class of approximately 50,000 purchasers of loan notes from Prosper Marketplace, Inc. and denied summary judgment. At the time of settlement, we were preparing for an imminent trial. The Firm's work resulted in a ruling by the Court of Appeal clarifying the pleading requirements for controlling officers and directors under both California and federal securities laws. *See, Hellum v. Breyer*, 194 Cal.App.4th 1300 (2011).

- *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917, Case No. 07-5944 SC. The Firm served on document review and deposition preparation teams for this indirect purchaser class action case in the Northern District of California. The case settled in 2015 for over $500 million.

- *In re Textainer Partnership Securities Litigation*. Robert Green served as Lead Trial Counsel in these consolidated cases. The cases settled for $10 million after Plaintiffs obtained a ruling in their favor at the conclusion of Phase 1 of the trial in San Francisco Superior Court. The Plaintiffs asserted breach of fiduciary duty claims in connection with a sale of assets transaction that resulted in the dissolution of six limited partnerships.

- *McKesson Inc. Derivative Litigation.* McKesson-HBOC, Inc. lost $9 billion in stock market capitalization in one day during April 1999 after announcing that prior financial statements would be restated due to accounting errors. Rather than pursuing the individuals and companies who participated in the conduct that led to the accounting

restatements, the company sued its own shareholders in a case that was promptly dismissed by the Ninth Circuit U.S. Court of Appeals. As co-counsel for plaintiff shareholders seeking to recover money on behalf of the corporation from the wrongdoers, the Firm obtained an important decision from the Delaware Supreme Court expanding the rights of shareholders to obtain and inspect corporate documents where there is a proper purpose for investigating potential wrongdoing. *See Saito v. McKesson HBOC, Inc.*, 806 A.2d 113 (Del. Supr. 2002). A substantial settlement on behalf of the Company was approved by the Delaware Chancery Court on February 12, 2006.

- *In re Providian Credit Card Cases*. Robert Green was appointed co-lead counsel in this national class action brought on behalf of Providian credit card customers who were improperly charged late fees, higher interest rates on balance transfers, and fees for add-on products, including Credit Protection, PricePro, Drive Pro, HealthPro, and credit line increases. The San Francisco Superior Court approved a settlement for $105 million, which covered restitution to Providian customers, "in-kind" payments to customers, and the costs and expenses of the litigation.

Attorneys

Robert S. Green litigates cases of national import across a spectrum of subjects. In antitrust litigation, Mr. Green was named to the Steering Committee of the Lithium Ion Batteries Indirect Purchaser Litigation, and served on important discovery and trial preparation roles in the SRAM, DRAM, and LCD-TFT Thin Film Transistor class actions. In credit card class actions, Mr. Green was one of the Lead Counsel in the Chase Bank “Check Loans” Litigation which settled for $100 million in 2012 and in the Providian Credit Card Cases that settled for $75 million in 2001. Mr. Green successfully argued the Ninth Circuit Appeal in DeMando v. Capital One Bank. In securities litigation, Mr. Green has been named Lead Counsel by state and federal courts from California to New York, participated in or served as lead counsel in three trials, two of which lasted six months, and obtained settlements of $35.75 million for Securities Act claims in the STEC Securities Litigation, $10 million for unregistered securities claims in the Prosper Marketplace Litigation, and $10 million for limited partner claims in the Textainer Limited Partners Securities Litigation. In consumer and defective product cases, Mr. Green was a key member of the trial team in a three month trial against Ford Motor Company in connection with Ford Explorer/Firestone Tire Rollover Litigation that resulted in a substantial settlement at the conclusion of the trial. Mr. Green also successfully prosecuted defective computer claims against HP and Toshiba, defective software claims against Sony, defective dashboard electronics claims against Audi and internet fraud claims against Webloyalty.com.

Mr. Green is AV Preeminent Peer Review Rated by Martindale-Hubbell and was named a finalist for Consumer Attorney of the Year in 2013 by the Consumer Attorneys of California in connection with his work on the Chase Bank “Check Loans” Litigation. Mr. Green is recognized as one of the “Super Lawyers” of Northern California. Mr. Green graduated with honors from the University of the Pacific, McGeorge School of Law in 1984. He received his Masters of Business Administration degree from California State University-Sacramento in 1989 and his undergraduate degree with distinction from Oregon State University in 1981. Mr. Green is an active member of the National Association of Consumer Attorneys (NACA). Mr. Green is an Editorial Advisor for the Consumer Financial Services Law Report and is on the Partners’ Council for the National Consumer Law Center. Mr. Green also served on the Board of Marin AIDS Interfaith Network. Publications by Mr. Green include Developments in Credit Card

Litigation, published by the Review of Banking and Financial Services; and Litigating Credit Card Cases, published by the Consumer Advocate. Mr. Green is licensed to practice in California.

James Robert Noblin has practiced complex business litigation since 1984, focusing primarily on antitrust and unfair competition cases. Mr. Rob Noblin graduated from Harvard Law School *cum laude* in 1983. He received his undergraduate degree *summa cum laude* from the University of Southern California in 1980. After graduating from law school, Mr. Noblin was a law clerk for the Honorable William A. Norris of the United States Court of Appeals for the Ninth Circuit from 1983 - 1984.

Mr. Noblin has tried over 10 cases to a jury as either the lead or a principal trial lawyer, including the six-week trial resulting in a verdict of over $ 70 million that was upheld in *Image Tech. Services, Inc. v. Eastman Kodak Co.*, 125 F.3d 1195 (9th Cir. 1997). His other representative cases include: . *In re Domestic Drywall Antitrust Litig.*, 163 F. Supp. 3d 175 (E.D. Pa. 2016), Fun v. Leapfrog Enters., No. CV 09-916-GHK (VBXx), 2010 U.S. Dist. LEXIS 146641 (C.D. Cal. Sep. 10, 2010), *Newcal Indus., Inc. v. Ikon Office Solution*, 513 F.3d 1038, 1043 (9th Cir. 2008) *ABC Int'l Traders, Inc. v. Matsushita Elec. Corp.*, 14 Cal. 4th 1247, 931 P.2d 290 (1997); *Knevelbaard Dairies v. Kraft Foods, Inc.*, 232 F.3d 979 (9th Cir. 2000) *Brill Media Co., LLC v. TCW Group, Inc.*, 132 Cal. App. 4th 324, 33 Cal. Rptr. 3d 371 (2005); *Proctor v. Vishay Intertechnology Inc.*, 584 F.3d 1208 (9th Cir. 2009); *Am. Ad Mgmt., Inc. v. Gen. Tel. Co. of California*, 190 F.3d 1051, 1053 (9th Cir. 1999) *Consol. Credit Agency v. Equifax, Inc.*, CV-03-1229 CAS(CWX), 2005 WL 6218038 (C.D. Cal. Jan. 26, 2005); *Hanson v. Morgan Stanley Smith Barney, LLC*, 762 F. Supp. 2d 1201, 1209 (C.D. Cal. 2011); and *Lori Rubinstein Physical Therapy, Inc. v. PTPN, Inc.*, 148 Cal. App. 4th 1130, 56 Cal. Rptr. 3d 351 (2007).

He also contributed to Chapter 20, *California Antitrust and Unfair Competition Law, Revised Edition*, published by the California State Bar Antitrust and Unfair Competition Section and has published articles on antitrust topics, including *United States v. AMR Corp. and Judicial Hostility Toward Predatory Pricing Cases*, Antitrust Report (Jan. 2002); *The Tumult in State Antitrust Law: Cel-Tech and the California Example in Little FTC Act Cases*, Antitrust Report (June 1999); and *The Confluence of Muddied Waters: Antitrust Consequential Damages and the Interplay of Proximate Cause, Antitrust Injury, Standing and Disaggregation*, 13 St. John's Journal of Legal Commentary 145 (1998).

Mika E. Otsubo graduated from Suffolk University Law School *cum laude* in 2005. She received her Bachelor of Arts in Mathematics in December 2001 from the University of California, Berkeley. Ms. Otsubo is bilingual in English and Japanese. After graduating from law school, Ms. Otsubo worked at various law firms specializing in research and document review in the United States. From 2010 thru 2015, Ms. Otsubo accepted a Vice President position in the Corporate Banking Compliance Unit at Citibank Japan, Ltd.

Raina S. Kim graduated from the University of Chicago Law School in 2007. She received her Bachelor of Arts *cum laude* in Film and Television Studies in 2003. Ms. Kim is fluent is English, Korean and conversational Spanish. While in Law School, Ms. Kim worked as Research Assistant to the Honorable Richard Posner, assisting in the completion of Judge Posner's Book, *Uncertain Shield: The U.S. Intelligence System in the Throes of Reform*.

EXHIBIT B

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

GREEN & NOBLIN, P.C. **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR
Robert S. Green (P)	7.70	0.00	26.90	0.00	38.80	0.00	14.00	29.40	0.00	0.00	10.40	10.40	0.00	0.00	137.60	$750.00	$103,200.00
James Robert Noblin (P)	18.80	0.00	0.00	0.00	0.00	0.00	0.00	85.40	0.00	0.00	0.00	0.00	0.00	1.40	105.60	$750.00	$79,200.00
Lesley E. Weaver (P)	12.00	0.00	14.00	0.00	0.00	1.70	0.20	26.20	1.60	0.00	19.20	0.00	0.00	16.40	91.30	$650.00	$59,345.00
Raina Kim (A)	0.00	0.00	0.00	0.00	0.00	0.00	821.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	821.60	$350.00	$287,560.00
Mika E. Otsubu (A)	0.00	0.00	0.00	0.00	0.00	0.00	663.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	663.30	$450.00	$298,485.00
															0.00		$0.00
SUB-TOTAL	**38.50**	**0.00**	**40.90**	**0.00**	**38.80**	**1.70**	**1499.10**	**141.00**	**1.60**	**0.00**	**29.60**	**10.40**	**0.00**	**17.80**	**1819.40**		**$827,790.00**
NON-ATTORNEYS																	
Patricia Spaleta (PL)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6.00	0.00	0.00	0.00	0.00	0.00	0.00	6.00	$195.00	$1,170.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.00**		**$1,170.00**
GRAND TOTAL:	**38.50**	**0.00**	**40.90**	**0.00**	**38.80**	**1.70**	**1499.10**	**147.00**	**1.60**	**0.00**	**29.60**	**10.40**	**0.00**	**17.80**	**1825.40**		**$828,960.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

GREEN & NOBLIN, P.C.

ATTORNEYS	DATE RANGE	HOURLY RATE
Robert S. Green	6/1/2013 – 12/31/2015	$695.00
Robert S. Green	1/1/2016 – 2/28/2017	$750.00
James Robert Noblin	6/1/2013 – 12/31/2015	$675.00
James Robert Noblin	1/1/2016 – 2/28/2017	$750.00
Lesley E. Weaver	6/1/2013 – 12/31/2014	$650.00
Raina Kim	6/4/2014 – 12/15/2014	$350.00
Mika E. Otsubu	6/18/2015 – 12/22/2015	$450.00
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Patricia Spaleta	6/1/2013 – 2/28/2017	$195.00

EXHIBIT D

(REDACTED)

Nickname	BATT □1284		
Full Name	Young v. LG Chem, LTD		
Address	c/o Green & Noblin, P.C. 700 Larkspur Landing Circle, Suite 275 Larkspur, CA 94939		
Phone	415-477-6700	Fax	415-477-6710
Home		□ther	
In Ref To	Young v. LG Chem, LTD		
Fees Arrg.	By billing value on each slip		
Expense Arrg.	By billing value on each slip		
Tax Profile	Exempt		
Last bill			
Last charge	1/10/2017		
Last payment		Amount	$0.00

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
6/20/2013	PJS	195.00	2.00	390.00	Billable
97940	□/batt-pldgs/motions				
	Prepare motion to relate cases (Marcus) (.6) ; Prepare Declaration of R. Green (.8) ; Prepare Proposed □rder (.3) and Response to □SC (.3)				
6/20/2013	RSG	695.00	2.50	1,737.50	Billable
97941	□/batt-pldgs/motions				
	Review □SC □rder from Court; Prepare Motion to Relate [redacted] Case to MDL with supporting documents and Response to □SC				
6/20/2013	RSG	695.00	1.10	764.50	Billable
97942	□/batt-litigation strategy				
	Communicate with [redacted] and referring counsel re □regon and Arizona Plaintiffs				
6/21/2013	LEW	650.00	1.10	715.00	Billable
97937	□/batt-pldgs/motions				
	Confer regarding inserts for S. Harmon and C. Hunt regarding amended complaint; follow up [redacted] re: timing off amended complaint;				
6/21/2013	RSG	695.00	4.70	3,266.50	Billable
97943	□/batt-litigation strategy				
	[redacted] (1.5); [redacted] (1.5); Communicate with lead counsel re same (.7); Assess class issues for governmental plaintiffs (1.0)				
6/24/2013	RSG	695.00	0.90	625.50	Billable
97945	□/batt-litigation strategy				
	Further analysis and communications re claims of [redacted]				
6/26/2013	RSG	695.00	1.70	1,181.50	Billable
97946	□/batt-litigation strategy				
	Communication with [redacted] re laptop claims				

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
6/28/2013 97938	RSG □/batt-litigation strategy [redacted]	695.00	0.50	347.50	Billable
6/28/2013 97939	LEW □/batt-pldgs/motions Review and revise amended complaint;	650.00	0.50	325.00	Billable
6/28/2013 97948	RSG □/batt-litigation strategy Review and assess protective order for Plaintiffs; [redacted]	695.00	1.50	1,042.50	Billable
7/1/2013 98630	RSG □/batt-pldgs/motions Review draft amended complaint, particularly allegations re plaintiffs. [redacted] re draft complaint.	695.00	4.50	3,127.50	Billable
7/2/2013 98631	RSG □/batt-pldgs/motions Complete review of complaint, [redacted] communications with lead counsel re same.	695.00	2.80	1,946.00	Billable
12/5/2013 100743	LEW □/batt-pldgs/motions Review and analyze issues presented in Motion to Dismiss to determine if they affect municipal entities.	650.00	0.80	520.00	Billable
12/6/2013 100744	LEW □/batt-court Prepare for and attend hearing on Motion to Dismiss	650.00	2.40	1,560.00	Billable
12/6/2013 100745	LEW □/batt-investigations Confer with co-counsel re: preparation for presentation on municipal entity representation	650.00	0.40	260.00	Billable
12/9/2013 100727	LEW □/batt-pldgs/motions Confer with various co-counsel re: next steps in case following hearing on Motion to dismiss.	650.00	1.40	910.00	Billable
12/9/2013 100875	LEW □/batt-investigations Confer with coordinating municipal plaintiffs and brief them on related issues	650.00	0.50	325.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
12/10/2013 100731	LEW □/batt-investigations Prepare for conference call with L.R. and S.C. re investigation of purchases by municipal entities.	650.00	0.40	260.00	Billable
12/10/2013 100732	LEW □/batt-investigations Attend conference call with co-counsel.	650.00	0.20	130.00	Billable
1/7/2014 100639	LEW □/batt-investigations [redacted]	650.00	0.30	195.00	Billable
1/8/2014 100640	LEW □/batt-investigations Confer with co-lead counsel re kinds of batteries in products; confer with co-counsel re same.	650.00	0.10	65.00	Billable
1/8/2014 100641	LEW □/batt-investigations Research re kinds of products produced by [redacted]	650.00	0.30	195.00	Billable
1/9/2014 100649	LEW □/batt-investigations Prepare for and confer with co-lead counsel re: identifying specific kinds of products to [redacted]	650.00	0.90	585.00	Billable
1/10/2014 100650	LEW □/batt-investigations Follow-up with lead counsel re: products at issue in letter.	650.00	0.20	130.00	Billable
1/13/2014 100660	LEW □/batt-disc resp Analyze scope of requests for [redacted] ; research re same; [redacted] re same.	650.00	0.90	585.00	Billable
1/14/2014 100661	LEW □/batt-investigations Confer with co-leads re scope of products; follow-up with [redacted] re same.	650.00	0.40	260.00	Billable
1/14/2014 101128	JRN □/batt-investigations Research and communications with co-counsel re impact of segregating by products or by particular brands and models	675.00	3.70	2,497.50	Billable
1/16/2014 100672	LEW □/batt-litigation strategy Prepare for and attend status call with co-counsel.	650.00	0.40	260.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
1/16/2014	LEW	650.00	0.10	65.00	Billable
100673	□/batt-pldgs/motions				
	Review and analyze motion to continue Case management conference				
1/21/2014	LEW	650.00	0.70	455.00	Billable
100678	□/batt-pldgs/motions				
	Review and analyze Judge Gonzalez-Rogers' order on motions to dismiss				
1/22/2014	LEW	650.00	1.50	975.00	Billable
100679	□/batt-pldgs/motions				
	Review and analyze defendants motion to dismiss; draft communication to [redacted] re same.				
1/23/2014	LEW	650.00	0.20	130.00	Billable
100685	□/batt-litigation strategy				
	Confer with co-counsel re document review; status of work.				
1/23/2014	LEW	650.00	1.40	910.00	Billable
100686	□/batt-investigations				
	Research re standing of municipalities in certain states.				
1/23/2014	LEW	650.00	0.40	260.00	Billable
100687	□/batt-pldgs/motions				
	Review and analyze cases cited in court order on motion to dismiss re finished product issues.				
1/24/2014	LEW	650.00	0.30	195.00	Billable
100688	□/batt-disc resp				
	Coordinate re setting times to meet with clients for document review.				
1/27/2014	LEW	650.00	0.40	260.00	Billable
100694	□/batt-disc resp				
	Confer with [redacted] re search for documents.				
2/6/2014	LEW	650.00	0.10	65.00	Billable
100766	□/batt-pldgs/motions				
	Review and analyze joint status conference statement.				
2/6/2014	LEW	650.00	0.20	130.00	Billable
100767	□/batt-disc resp				
	Confer with [redacted] re: collection documents relating to purchases.				
2/7/2014	LEW	650.00	1.40	910.00	Billable
100768	□/batt-court				
	Prepare for and attend Case management conference.				
2/10/2014	LEW	650.00	0.70	455.00	Billable
100775	□/batt-disc resp				
	Confer with client CCSF re: collection of documents				

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
2/10/2014 100776	LEW □/batt-pldgs/motions Research re: assignment of claims; analyze codes, cases and law treatises re: assigning claims from municipalities.	650.00	1.10	715.00	Billable
2/10/2014 100777	LEW □/batt-pldgs/motions Summarize hearing for [redacted] and confer re: briefing schedule.	650.00	0.20	130.00	Billable
2/10/2014 101129	JRN □/batt-investigations Legal research re municipalities assigning claims arising out of anticompetitive misconduct	675.00	7.70	5,197.50	Billable
2/12/2014 100788	LEW □/batt-disc resp Prepare for and attend meeting with purchasing department for City of Palo Alto re: document collection.	650.00	3.10	2,015.00	Billable
2/21/2014 100822	LEW □/batt-investigations Follow-up re outreach to [redacted] in Montana and Utah	650.00	0.30	195.00	Billable
2/24/2014 100823	LEW □/batt-disc resp Research re: procurement statutes (1.6); [redacted] (.5).	650.00	2.10	1,365.00	Billable
2/25/2014 100826	LEW □/batt-litigation strategy Prepare for and attend conference with Louise Renne and Kathleen Foote to discuss [redacted] in action	650.00	1.60	1,040.00	Billable
2/26/2014 100836	LEW □/batt-disc resp Prepare for and attend conference call with client re purchasing requirements/procurement statutes.	650.00	0.20	130.00	Billable
2/26/2014 100837	LEW □/batt-litigation strategy Draft and send email to the [redacted] re: coordinating.	650.00	0.20	130.00	Billable
2/28/2014 100843	LEW □/batt-investigations Confer with [redacted] at □akland County, MI re: batteries case.	650.00	0.50	325.00	Billable
2/28/2014 100845	LEW □/batt-litigation strategy Coordinate with c-counsel re: meeting in [redacted]	650.00	0.70	455.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/3/2014 101104	RSG □/batt-doc rev Review issue outline and overview of Indirect Review Project in preparation for document review.	695.00	1.50	1,042.50	Billable
3/4/2014 101107	RSG □/batt-doc rev Work on Sanyo document review in connection with preparation of amended complaint.	695.00	3.90	2,710.50	Billable
3/5/2014 100848	LEW □/batt-investigations Meet with [redacted] to discuss representation	650.00	1.30	845.00	Billable
3/5/2014 101101	RSG □/batt-pldgs/motions Telephone conference with J. Friedman re responding to public entity section of motion to dismiss.	695.00	0.40	278.00	Billable
3/5/2014 101108	RSG □/batt-doc rev Work on Sanyo document review in connection with preparation of amended complaint.	695.00	2.20	1,529.00	Billable
3/6/2014 100849	LEW □/batt-investigations Review and revise letter to clients re: case status.	650.00	0.60	390.00	Billable
3/6/2014 101109	RSG □/batt-doc rev Work on Sanyo document review in connection with preparation of amended complaint.	695.00	2.90	2,015.50	Billable
3/7/2014 100939	PJS □/batt-pldgs/motions Research/review docket of In Re □ptical Disc Drive for filings re authority on named plaintiffs in IPP class action.	195.00	1.20	234.00	Billable
3/7/2014 101110	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	1.80	1,251.00	Billable
3/7/2014 101132	JRN □/batt-pldgs/motions Legal Research re opposing motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	8.80	5,940.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/8/2014	PJS	195.00	0.90	175.50	Billable
100940	□/batt-pldgs/motions				
	Continue research/review docket of In Re □ptical Disc Drive for filings re authority on named plaintiffs in IPP class action.				
3/8/2014	JRN	675.00	5.80	3,915.00	Billable
101133	□/batt-pldgs/motions				
	Legal Research re opposing motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state				
3/9/2014	PJS	195.00	1.90	370.50	Billable
100941	□/batt-pldgs/motions				
	Complete research/review docket of In Re □ptical Disc Drive for filings re authority on named plaintiffs in IPP class action; prepare email to R. Noblin re findings				
3/9/2014	JRN	675.00	6.20	4,185.00	Billable
101134	□/batt-pldgs/motions				
	Legal Research re opposing motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state				
3/9/2014	LEW	650.00	0.90	585.00	Billable
101147	□/batt-pldgs/motions				
	Review and analyze defendants' motion to dismiss				
3/9/2014	LEW	650.00	1.50	975.00	Billable
101148	□/batt-pldgs/motions				
	Research re: CAND cases ruling on standing issue				
3/10/2014	RSG	695.00	0.50	347.50	Billable
101102	□/batt-pldgs/motions				
	Review motion to dismiss in preparation for drafting opposition.				
3/10/2014	RSG	695.00	1.00	695.00	Billable
101103	□/batt-pldgs/motions				
	Telephone conference call with document review team in connection with reviewing documents to amend complaint.				
3/10/2014	RSG	695.00	0.80	556.00	Billable
101111	□/batt-pldgs/motions				
	Work on Sanyo document review in connection with preparation of amended complaint.				
3/10/2014	JRN	675.00	8.80	5,940.00	Billable
101135	□/batt-pldgs/motions				
	Legal Research re opposing motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state				
3/10/2014	LEW	650.00	1.40	910.00	Billable
101149	□/batt-pldgs/motions				
	□utline response to Motion to dismiss; confer with R. Noblin re same.				

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/11/2014 101112	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	2.70	1,876.50	Billable
3/11/2014 101136	JRN □/batt-pldgs/motions Legal Research re opposing motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	7.60	5,130.00	Billable
3/11/2014 101150	LEW □/batt-pldgs/motions Research re effect of parens patriae actions	650.00	1.60	1,040.00	Billable
3/11/2014 101151	LEW □/batt-pldgs/motions Research re compulsory sub-classes; research re managerial sub-class; confer re same.	650.00	1.60	1,040.00	Billable
3/11/2014 101152	LEW □/batt-pldgs/motions Review and analyze law re managerial sub-classes	650.00	0.40	260.00	Billable
3/12/2014 101105	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	2.70	1,876.50	Billable
3/12/2014 101137	JRN □/batt-pldgs/motions Drafting opposition to motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	8.90	6,007.50	Billable
3/12/2014 101153	LEW □/batt-litigation strategy Prepare for and attend meeting with CA AG and staff; confer with co-counsel re same.	650.00	3.90	2,535.00	Billable
3/12/2014 101154	LEW □/batt-litigation strategy Legal research re AG actions in consumer antitrust cases.	650.00	0.50	325.00	Billable
3/13/2014 101106	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	3.50	2,432.50	Billable
3/13/2014 101138	JRN □/batt-pldgs/motions Revising opposition to motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	9.90	6,682.50	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/13/2014 101155	LEW □/batt-pldgs/motions Review and analyze draft response to defendants motion to dismiss	650.00	0.50	325.00	Billable
3/13/2014 101156	LEW □/batt-pldgs/motions Research re MI law re: [redacted]	650.00	1.10	715.00	Billable
3/14/2014 101139	JRN □/batt-pldgs/motions Revising and transmitting to co-counsel opposition to motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	5.70	3,847.50	Billable
3/14/2014 101157	LEW □/batt-pldgs/motions Review and revise draft opposition to motion to dismiss; confer re: same.	650.00	0.50	325.00	Billable
3/17/2014 101113	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	1.40	973.00	Billable
3/18/2014 101114	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	3.10	2,154.50	Billable
3/18/2014 101140	JRN □/batt-pldgs/motions Review and analyze changes by co-counsel to motion to dismiss on grounds of managerial subclasses and absence of requirement to have plaintiff in each state	675.00	4.70	3,172.50	Billable
3/18/2014 101158	LEW □/batt-pldgs/motions Review and analyze proposed changes to opposition from co-counsel at Renne Stone	650.00	0.60	390.00	Billable
3/19/2014 101115	RSG □/batt-pldgs/motions Work on Sanyo document review in connection with preparation of amended complaint.	695.00	1.70	1,181.50	Billable
3/21/2014 101159	LEW □/batt-investigations Confer with co-lead re outreach to MI and Utah.	650.00	0.40	260.00	Billable
3/21/2014 101160	LEW □/batt-disc resp Follow-up re: [redacted] documents.	650.00	0.20	130.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
3/21/2014 101161	LEW □/batt-investigations Follow-up with counsel for [redacted] re: possible representation.	650.00	0.30	195.00	Billable
3/31/2014 101144	LEW □/batt-disc resp Follow-up with [redacted] re:document review	650.00	0.40	260.00	Billable
4/7/2014 101145	LEW □/batt-disc resp Follow-up with [redacted] re: document collection efforts	650.00	0.40	260.00	Billable
4/7/2014 101146	LEW □/batt-pldgs/motions Review and analyze opposition to motion to dismiss	650.00	0.30	195.00	Billable
4/7/2014 102259	JRN □/batt-pldgs/motions Review and analyze final version of opposition to motion to dismiss as filed, comparison to earlier drafts	675.00	1.30	877.50	Billable
4/18/2014 101705	LEW □/batt-disc resp Follow up with [redacted] re document preservation.	650.00	0.40	260.00	Billable
4/29/2014 101710	LEW □/batt-disc resp Confer with local counsel re new client in [redacted]	650.00	0.50	325.00	Billable
5/2/2014 101730	LEW □/batt-pldgs/motions Review and analyze Maxell motion to dismiss; confer re assignment of same.	650.00	1.20	780.00	Billable
5/2/2014 101734	LEW □/batt-investigations Prepare representation agreement for [redacted]	650.00	0.40	260.00	Billable
5/5/2014 101744	LEW □/batt-pldgs/motions Review and analyze Maxell motion to dismiss; confer with J. Noblin re same.	650.00	0.90	585.00	Billable
5/5/2014 101746	LEW □/batt-investigations Confer with counsel for [redacted] re potential damages.	650.00	0.30	195.00	Billable
5/5/2014 102263	JRN □/batt-pldgs/motions Review and analyze Maxell MTD	675.00	1.30	877.50	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
5/8/2014 101770	LEW □/batt-disc resp Prepare for and attend conference call with co-counsel re document collection issues.	650.00	0.60	390.00	Billable
5/8/2014 101773	LEW □/batt-pldgs/motions Confer with J. King re Maxell opposition; confer with R. Noblin re same.	650.00	0.60	390.00	Billable
5/8/2014 101774	LEW □/batt-pldgs/motions Confer with counsel for [redacted] re briefing on motion to dismiss and 5/9 hearing.	650.00	0.40	260.00	Billable
5/8/2014 101775	LEW □/batt-pldgs/motions Confer with B. Glackin re preparation for hearing.	650.00	0.30	195.00	Billable
5/8/2014 101776	LEW □/batt-pldgs/motions Research and preparation for oral argument re municipal standing.	650.00	2.60	1,690.00	Billable
5/8/2014 102261	JRN □/batt-pldgs/motions Research re assistance preparing counsel for oral argument on MTD	675.00	1.80	1,215.00	Billable
5/9/2014 101777	LEW □/batt-court Prepare for, attend and argue motion to dismiss re governmental entities.	650.00	5.50	3,575.00	Billable
5/9/2014 102262	JRN □/batt-pldgs/motions Research re assistance preparing counsel for oral argument on MTD	675.00	1.50	1,012.50	Billable
5/9/2014 102264	JRN □/batt-pldgs/motions Review and analyze Maxell MTD	675.00	3.20	2,160.00	Billable
5/10/2014 102265	JRN □/batt-pldgs/motions Review and analyze Maxell MTD	675.00	4.00	2,700.00	Billable
5/13/2014 102269	JRN □/batt-pldgs/motions Revising opposition to Maxell MTD	675.00	2.80	1,890.00	Billable
5/14/2014 101811	LEW □/batt-pldgs/motions Review and revise draft opposition to motion to dismiss.	650.00	1.10	715.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
5/14/2014 102270	JRN □/batt-pldgs/motions Finalizing review draft of opposition to Maxell MTD for transmittal to co-counsel.	675.00	3.10	2,092.50	Billable
5/16/2014 102105	LEW □/batt-disc resp Prepare for, travel to and meet with [redacted] re document collection.	650.00	3.30	2,145.00	Billable
5/23/2014 102145	LEW □/batt-doc rev Confer re R. Kim document reviewer.	650.00	0.10	65.00	Billable
5/29/2014 102176	LEW □/batt-doc rev Follow up re additional document reviewers.	650.00	0.10	65.00	Billable
6/4/2014 102164	RSG □/batt-doc rev Review issues outlines and related documents and participate in conference call re upcoming document review for purposes of managing the process	695.00	3.50	2,432.50	Billable
6/4/2014 102230	RSK □/batt-doc rev Training for Catalyst software and overview of issues and coding instructions.	350.00	2.10	735.00	Billable
6/5/2014 102231	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
6/6/2014 102232	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
6/9/2014 102233	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.20	1,820.00	Billable
6/10/2014 102234	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	4.10	1,435.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
6/11/2014 102235	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
6/12/2014 102236	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
6/13/2014 102237	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
6/16/2014 102271	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.10	2,135.00	Billable
6/17/2014 102272	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.00	2,100.00	Billable
6/18/2014 102273	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.00	2,100.00	Billable
6/18/2014 102827	LEW □/batt-pldgs/motions Review and analyze reply brief on motion to dismiss	650.00	0.80	520.00	Billable
6/19/2014 102274	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.20	2,170.00	Billable
6/20/2014 102275	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	4.10	1,435.00	Billable
6/21/2014 102276	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	2.50	875.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
6/22/2014 102277	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	2.00	700.00	Billable
6/23/2014 102278	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.00	2,100.00	Billable
6/24/2014 102279	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.80	2,030.00	Billable
6/25/2014 102280	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.10	2,135.00	Billable
6/26/2014 102281	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.50	1,925.00	Billable
6/27/2014 102282	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.70	1,995.00	Billable
6/30/2014 102828	LEW □/batt-litigation strategy Follow-up with co-counsel P. Saferstein re document reviewers	650.00	0.40	260.00	Billable
7/1/2014 102283	RSK □/batt-doc rev Conference call re coding issues.	350.00	0.90	315.00	Billable
7/1/2014 102284	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.50	1,925.00	Billable
7/1/2014 102829	LEW □/batt-litigation strategy Follow-up with co-counsel re Japanese document reviewers	650.00	0.40	260.00	Billable
7/2/2014 102285	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
7/3/2014 102286	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
7/5/2014 102287	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	4.00	1,400.00	Billable
7/7/2014 102288	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable
7/7/2014 102289	RSK □/batt-doc rev Call with Shinae Kim-Helms re Korean document review for Samsung SDI.	350.00	0.50	175.00	Billable
7/8/2014 102290	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.10	2,485.00	Billable
7/9/2014 102291	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
7/9/2014 103060	LEW □/batt-disc m&c Follow-up re □SC in McGuire and other actions administratively closed in light of consolidation of action	650.00	0.50	325.00	Billable
7/10/2014 102292	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.60	2,660.00	Billable
7/11/2014 102293	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
7/14/2014 102294	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.80	2,380.00	Billable
7/15/2014 102295	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
7/16/2014 102314	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
7/16/2014 103062	LEW □/batt-litigation strategy Prepare for and meet with R. Riddle of Renne Sloane re case status	650.00	1.40	910.00	Billable
7/17/2014 102315	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
7/18/2014 102316	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.80	2,730.00	Billable
7/21/2014 102317	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
7/22/2014 102318	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.40	2,240.00	Billable
7/22/2014 103063	LEW □/batt-investigations Follow-up with client re document collection and preservation	650.00	0.40	260.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
7/22/2014 103099	JRN □/batt-investigations Research and analysis re identifying named representative plaintiffs who meet the class definition	675.00	7.40	4,995.00	Billable
7/23/2014 102319	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.00	2,100.00	Billable
7/24/2014 102320	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalystat the direction of Ronnie Spiegel.	350.00	7.20	2,520.00	Billable
7/25/2014 102321	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.50	1,925.00	Billable
7/25/2014 103064	LEW □/batt-investigations Follow-up with CCSF re document collection.	650.00	0.30	195.00	Billable
7/28/2014 102322	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
7/29/2014 102323	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.10	2,135.00	Billable
7/30/2014 102324	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.20	1,820.00	Billable
7/31/2014 102325	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.80	2,380.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
8/1/2014 102326	RSK □/batt-doc rev Discovery - Documents: review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.30	2,555.00	Billable
8/1/2014 103065	LEW □/batt-litigation strategy Prepare for and attend call with clients re case status and next steps	650.00	0.40	260.00	Billable
8/4/2014 102681	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
8/4/2014 103066	LEW □/batt-investigations Coordinate re meeting at [redacted] re documents	650.00	0.40	260.00	Billable
8/5/2014 102682	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
8/6/2014 102683	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable
8/7/2014 102684	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/7/2014 103067	LEW □/batt-court Review and analyze arguments opposing motion to dismiss	650.00	2.30	1,495.00	Billable
8/8/2014 102685	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/8/2014 103068	LEW □/batt-court Prepare for and attend hearing on Motion to Dismiss	650.00	2.70	1,755.00	Billable
8/8/2014 103100	JRN □/batt-court Prepare for and Attend Hearing on Motion to Dismiss	675.00	1.40	945.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/11/2014 102686	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.00	2,100.00	Billable
8/11/2014 103069	LEW □/batt-court Confer with client re hearing and expected rulings	650.00	0.90	585.00	Billable
8/12/2014 102687	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/13/2014 102688	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/13/2014 103070	LEW □/batt-investigations Research and analyze case law to prepare for class certification	650.00	1.10	715.00	Billable
8/14/2014 102689	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst.	350.00	7.20	2,520.00	Billable
8/15/2014 102690	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
8/15/2014 103071	LEW □/batt-litigation strategy Confer re position of CCSF re case involvement	650.00	0.30	195.00	Billable
8/18/2014 102691	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/19/2014 102692	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/20/2014 102693	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	3.50	1,225.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/21/2014 102694	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/22/2014 102695	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/24/2014 102696	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	4.50	1,575.00	Billable
8/25/2014 102697	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/26/2014 102698	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/26/2014 103074	LEW □/batt-litigation strategy Attend to logistics of document review	650.00	0.40	260.00	Billable
8/27/2014 102699	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/28/2014 102700	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
8/28/2014 103075	LEW □/batt-litigation strategy Update [redacted]re case status	650.00	0.20	130.00	Billable
8/29/2014 102701	RSK □/batt-doc rev Review and coding of defendant Samsung SDI's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
9/10/2014 103076	LEW □/batt-litigation strategy Coordinate re document preservation of governmental entities	650.00	0.50	325.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
9/10/2014 103077	LEW □/batt-rev pldgs Review and analyze requirements of USDC - Northern District for ESI preservation	650.00	1.20	780.00	Billable
9/11/2014 103078	LEW □/batt-litigation strategy Prepare for and attend conference call with co-leads re document preservation by clients	650.00	1.30	845.00	Billable
9/11/2014 103079	LEW □/batt-litigation strategy [redacted]	650.00	0.30	195.00	Billable
9/12/2014 103080	LEW □/batt-litigation strategy Review list seeking ESI information from clients (.2); coordinate stay answer (.2)	650.00	0.40	260.00	Billable
9/15/2014 103081	LEW □/batt-litigation strategy Follow-up on document preservation issues	650.00	0.30	195.00	Billable
9/16/2014 103082	LEW □/batt-litigation strategy Prepare for and attend call with co-leads and [redacted] re document collection and preservation	650.00	0.60	390.00	Billable
9/19/2014 103083	LEW □/batt-litigation strategy Receive and review [redacted] (.2); confer re same (.2).	650.00	0.40	260.00	Billable
9/23/2014 103084	LEW □/batt-litigation strategy Follow-up on status of document review; coordinate re next phase of review	650.00	0.50	325.00	Billable
9/23/2014 103085	LEW □/batt-litigation strategy Follow-up conversations re issues relating to plaintiff discovery	650.00	0.70	455.00	Billable
9/24/2014 103086	LEW □/batt-litigation strategy Prepare for and attend call with clients re next phase of case	650.00	0.60	390.00	Billable
9/29/2014 102830	RSG □/batt-investigations Review information produced by [redacted] and begin review for [redacted]	695.00	1.50	1,042.50	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
9/29/2014 102831	RSG □/batt-investigations	695.00	1.50	1,042.50	Billable
9/29/2014 103087	LEW □/batt-litigation strategy Coordinate re call for document reviewers	650.00	0.30	195.00	Billable
9/30/2014 102713	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	3.00	1,050.00	Billable
9/30/2014 102832	RSG □/batt-investigations Further work on documents from [redacted]	695.00	1.20	834.00	Billable
10/1/2014 102714	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/2/2014 102715	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	6.50	2,275.00	Billable
10/3/2014 102716	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/3/2014 103088	LEW □/batt-court Review and analyze court's order on motion to dismiss	650.00	0.80	520.00	Billable
10/6/2014 102717	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/7/2014 102718	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
10/7/2014 103089	LEW □/batt-litigation strategy Follow-up re declaration for [redacted]	650.00	0.20	130.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
10/7/2014	LEW	650.00	0.30	195.00	Billable
103090	□/batt-litigation strategy Follow-up re letter clarifying custodians				
10/8/2014	RSK	350.00	8.00	2,800.00	Billable
102719	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/8/2014	LEW	650.00	0.30	195.00	Billable
103091	□/batt-disc resp Coordinate re plaintiff's discovery responses				
10/9/2014	RSK	350.00	8.00	2,800.00	Billable
102720	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/9/2014	LEW	650.00	0.50	325.00	Billable
103092	□/batt-litigation strategy Confer re CCSF's reluctance to be responsive				
10/11/2014	LEW	650.00	0.60	390.00	Billable
103093	□/batt-investigations Research re Rule 41 dismissal for [redacted]				
10/13/2014	RSK	350.00	8.00	2,800.00	Billable
102721	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/14/2014	RSK	350.00	8.00	2,800.00	Billable
102722	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/15/2014	RSK	350.00	8.00	2,800.00	Billable
102723	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/16/2014	RSK	350.00	8.00	2,800.00	Billable
102724	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				
10/17/2014	RSK	350.00	8.00	2,800.00	Billable
102725	□/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.				

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
10/20/2014 102726	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/21/2014 102727	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/22/2014 102728	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/22/2014 103094	LEW □/batt-court Attend Rule 41 dismissal	650.00	0.40	260.00	Billable
10/22/2014 104051	LEW □/batt-rev pldgs Attend to Rule 41 dismissal	650.00	0.40	260.00	Billable
10/23/2014 102729	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
10/24/2014 102730	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/27/2014 102731	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/28/2014 102732	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
10/28/2014 102735	RSK □/batt-doc rev Document review conference call.	350.00	0.80	280.00	Billable
10/29/2014 102733	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
10/30/2014 102734	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
10/30/2014 103095	LEW □/batt-litigation strategy Follow-up re [redacted] request for dismissal	650.00	0.20	130.00	Billable
11/3/2014 102702	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/4/2014 102703	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
11/4/2014 102712	RSK □/batt-doc rev Document review conference call	350.00	0.50	175.00	Billable
11/5/2014 102704	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/6/2014 102705	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/7/2014 102706	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/10/2014 102707	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/11/2014 102708	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
11/12/2014 102709	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/13/2014 102710	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/14/2014 102711	RSK □/batt-doc rev Review and coding of defendant Sony documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/17/2014 102736	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/18/2014 102737	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
11/18/2014 102744	RSK □/batt-doc rev Document review conference call	350.00	0.50	175.00	Billable
11/19/2014 102738	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	2.00	700.00	Billable
11/20/2014 102739	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/21/2014 102740	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	5.50	1,925.00	Billable
11/24/2014 102741	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
11/25/2014 102742	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
11/28/2014 102743	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/1/2014 103048	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable
12/2/2014 103049	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.70	2,695.00	Billable
12/2/2014 103059	RSK □/batt-doc rev Document Review Conference Call	350.00	0.30	105.00	Billable
12/3/2014 103050	RSK □/batt-doc rev Review and coding of defendant Sony's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable
12/4/2014 103051	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/5/2014 103052	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
12/5/2014 103096	LEW □/batt-litigation strategy Confer with clients re draft discovery plan	650.00	0.50	325.00	Billable
12/8/2014 103053	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/8/2014 103097	LEW □/batt-litigation strategy Follow-up re revised discovery plan	650.00	0.60	390.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
12/9/2014 103054	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/9/2014 103098	LEW □/batt-disc m&c Review and revise proposed discovery plan; confer with client re same.	650.00	1.20	780.00	Billable
12/10/2014 103055	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/11/2014 103056	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.50	2,625.00	Billable
12/12/2014 103057	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	8.00	2,800.00	Billable
12/15/2014 102833	RSG □/batt-investigations Receive and review documents from [redacted]	695.00	0.90	625.50	Billable
12/15/2014 103058	RSK □/batt-doc rev Review and coding of defendant Panasonic's documents in Catalyst at the direction of Ronnie Spiegel.	350.00	7.00	2,450.00	Billable
4/29/2015 104577	RSG □/batt-disc resp Begin review of prepared drafts of [redacted] discovery responses	695.00	1.50	1,042.50	Billable
4/30/2015 104578	RSG □/batt-disc resp Further work on [redacted] discovery responses	695.00	0.80	556.00	Billable
5/5/2015 104579	RSG □/batt-disc resp Review [redacted] documents and related discovery responses	695.00	2.30	1,598.50	Billable
5/6/2015 104580	RSG □/batt-disc resp Telephone conference with [redacted] and J. Jasnoch re [redacted] discovery responses	695.00	1.20	834.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
5/12/2015 104581	RSG □/batt-disc resp Review and assess revised discovery responses for [redacted] Communicated with client re same.	695.00	1.70	1,181.50	Billable
5/22/2015 104582	RSG □/batt-disc resp Review and pass on [redacted] verification re interrogatory	695.00	0.50	347.50	Billable
6/18/2015 104665	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.50	3,825.00	Billable
6/19/2015 104666	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	5.20	2,340.00	Billable
6/20/2015 104667	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	2.00	900.00	Billable
6/22/2015 104668	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	9.70	4,365.00	Billable
6/23/2015 104669	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.90	4,005.00	Billable
6/24/2015 104670	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.40	3,780.00	Billable
6/25/2015 104671	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.20	3,690.00	Billable
6/26/2015 104672	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	2.80	1,260.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
6/27/2015 104673	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	2.00	900.00	Billable
6/29/2015 104674	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	10.40	4,680.00	Billable
6/30/2015 104675	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	7.60	3,420.00	Billable
7/1/2015 104757	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	10.10	4,545.00	Billable
7/2/2015 104758	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	7.30	3,285.00	Billable
7/3/2015 104759	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	3.00	1,350.00	Billable
7/4/2015 104760	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	1.60	720.00	Billable
7/6/2015 104761	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.60	3,870.00	Billable
7/7/2015 104762	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	9.70	4,365.00	Billable
7/8/2015 104763	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	7.40	3,330.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
7/9/2015 104764	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	2.30	1,035.00	Billable
7/10/2015 104765	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	6.20	2,790.00	Billable
7/11/2015 104766	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	3.20	1,440.00	Billable
7/12/2015 104767	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	2.60	1,170.00	Billable
7/13/2015 104768	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	9.00	4,050.00	Billable
7/14/2015 104769	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.40	3,780.00	Billable
7/15/2015 104770	ME□ □/batt-doc rev Review and coding of custodial files of H Kubo of defendant Toshiba in Catalyst.	450.00	8.00	3,600.00	Billable
8/1/2015 104782	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	2.90	1,305.00	Billable
8/3/2015 104783	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	8.00	3,600.00	Billable
8/4/2015 104784	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	8.00	3,600.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/5/2015 104785	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	3.50	1,575.00	Billable
8/6/2015 104786	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	4.00	1,800.00	Billable
8/7/2015 104787	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	8.50	3,825.00	Billable
8/8/2015 104788	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	3.60	1,620.00	Billable
8/9/2015 104789	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	4.40	1,980.00	Billable
8/10/2015 104790	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	11.70	5,265.00	Billable
8/11/2015 104791	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.60	2,970.00	Billable
8/12/2015 104792	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	4.30	1,935.00	Billable
8/13/2015 104793	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	10.90	4,905.00	Billable
8/16/2015 104794	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	5.30	2,385.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/18/2015 104795	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.00	2,700.00	Billable
8/19/2015 104796	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	8.60	3,870.00	Billable
8/20/2015 104797	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	7.10	3,195.00	Billable
8/21/2015 104798	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	7.50	3,375.00	Billable
8/22/2015 104799	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	4.80	2,160.00	Billable
8/23/2015 104800	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.00	2,700.00	Billable
8/24/2015 104801	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	4.50	2,025.00	Billable
8/25/2015 104802	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	8.00	3,600.00	Billable
8/26/2015 104803	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	7.70	3,465.00	Billable
8/27/2015 104804	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	7.30	3,285.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/28/2015 104805	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.50	2,925.00	Billable
8/29/2015 104806	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.00	2,700.00	Billable
8/31/2015 104807	ME□ □/batt-doc rev Review and coding of custodial files of K. Takeshima of defendant NEC in Catalyst	450.00	6.30	2,835.00	Billable
9/1/2015 105221	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	7.50	3,375.00	Billable
9/2/2015 105222	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	8.00	3,600.00	Billable
9/3/2015 105223	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	5.50	2,475.00	Billable
9/4/2015 105224	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	4.10	1,845.00	Billable
9/8/2015 105225	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	4.20	1,890.00	Billable
9/9/2015 105226	ME□ □/batt-doc rev Review and coding of custodial files of K Takeshima of defendant NEC in Catalyst.	450.00	7.00	3,150.00	Billable
9/10/2015 105227	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
9/11/2015 105228	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.80	2,160.00	Billable
9/14/2015 105229	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.10	1,845.00	Billable
9/15/2015 105230	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.30	1,935.00	Billable
9/16/2015 105271	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
9/17/2015 105272	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.70	1,665.00	Billable
9/18/2015 105273	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.90	1,755.00	Billable
9/21/2015 105274	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.60	1,620.00	Billable
9/23/2015 105275	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.40	1,530.00	Billable
9/24/2015 105276	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.10	495.00	Billable
9/26/2015 105277	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	7.60	3,420.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
9/27/2015 105278	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.30	1,935.00	Billable
9/28/2015 105279	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.60	1,170.00	Billable
9/29/2015 105280	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.50	1,575.00	Billable
9/30/2015 105281	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.70	1,665.00	Billable
10/2/2015 105282	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.30	1,485.00	Billable
10/3/2015 105283	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
10/4/2015 105284	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.70	1,215.00	Billable
10/6/2015 105285	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
10/8/2015 105286	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.00	2,250.00	Billable
10/9/2015 105287	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.10	1,845.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
10/10/2015 105288	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	6.00	2,700.00	Billable
10/11/2015 105289	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	0.90	405.00	Billable
10/13/2015 105290	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.60	1,620.00	Billable
10/14/2015 105291	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.10	1,395.00	Billable
10/15/2015 105292	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.30	2,385.00	Billable
10/16/2015 105529	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
10/17/2015 105530	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
10/19/2015 105531	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
10/20/2015 105532	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	0.70	315.00	Billable
10/21/2015 105533	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.00	900.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
10/22/2015 105534	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.30	585.00	Billable
10/23/2015 105535	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	7.00	3,150.00	Billable
10/24/2015 105536	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.00	2,250.00	Billable
10/26/2015 105537	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.10	1,845.00	Billable
10/27/2015 105538	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.50	1,125.00	Billable
10/28/2015 105539	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
10/29/2015 105540	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
10/30/2015 105541	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.00	450.00	Billable
10/31/2015 105542	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
11/2/2015 105543	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
11/3/2015 105544	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.60	2,070.00	Billable
11/4/2015 105545	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.90	1,755.00	Billable
11/5/2015 105546	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.30	1,485.00	Billable
11/7/2015 105547	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
11/9/2015 105548	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.50	2,025.00	Billable
11/10/2015 105549	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
11/11/2015 105550	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.80	1,710.00	Billable
11/12/2015 105551	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
11/13/2015 105552	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.00	450.00	Billable
11/14/2015 105553	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.50	1,125.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
11/16/2015 105554	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.00	2,250.00	Billable
11/17/2015 105555	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.10	1,845.00	Billable
11/18/2015 105556	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.50	2,475.00	Billable
11/19/2015 105557	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.00	1,350.00	Billable
11/20/2015 105558	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	0.50	225.00	Billable
11/21/2015 105559	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.90	855.00	Billable
11/23/2015 105560	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.10	495.00	Billable
11/24/2015 105561	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.00	1,350.00	Billable
11/25/2015 105562	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.00	2,250.00	Billable
11/26/2015 105563	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	6.30	2,835.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
11/27/2015 105564	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.70	1,215.00	Billable
11/28/2015 105565	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.90	855.00	Billable
11/30/2015 105566	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	6.00	2,700.00	Billable
12/1/2015 105567	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.20	2,340.00	Billable
12/2/2015 105568	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.00	450.00	Billable
12/3/2015 105569	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
12/4/2015 105570	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.50	1,125.00	Billable
12/5/2015 105571	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.30	585.00	Billable
12/7/2015 105572	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.10	1,845.00	Billable
12/8/2015 105573	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.60	1,170.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
12/9/2015 105574	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	3.60	1,620.00	Billable
12/11/2015 105575	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
12/11/2015 105576	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.20	1,890.00	Billable
12/12/2015 105577	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.50	675.00	Billable
12/14/2015 105578	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	5.50	2,475.00	Billable
12/15/2015 105579	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.50	1,125.00	Billable
12/16/2015 105580	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
12/17/2015 105581	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	4.00	1,800.00	Billable
12/18/2015 105582	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.40	630.00	Billable
12/19/2015 105583	ME□ □/batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	2.60	1,170.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
12/20/2015 105584	ME / batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.50	675.00	Billable
12/21/2015 105585	ME / batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	6.60	2,970.00	Billable
12/22/2015 105586	ME / batt-doc rev Review and Select Expert Data documents from defendant Panasonic in Catalyst	450.00	1.00	450.00	Billable
1/4/2016 105813	RSG / batt-disc resp Review email and correspondence re [redacted] document production	750.00	0.50	375.00	Billable
1/7/2016 105814	RSG / batt-investigations Exchange emails with lead counsel re [redacted] production, review documents produced and analyze responses	750.00	1.90	1,425.00	Billable
1/8/2016 105815	RSG / batt-investigations Further work on obtaining documentation from [redacted]	750.00	0.70	525.00	Billable
1/12/2016 105816	RSG / batt-disc resp Review and analyze proposed supplemental responses for [redacted]	750.00	3.50	2,625.00	Billable
1/28/2016 105817	RSG / batt-depo defend Work on scheduling [redacted] deposition	750.00	0.20	150.00	Billable
2/1/2016 105818	RSG / batt-depo defend Further work on [redacted] deposition	750.00	0.40	300.00	Billable
2/2/2016 105819	RSG / batt-depo defend Begin review of Plaintiff deposition transcripts to [redacted] deposition; work on new dates for deposition	750.00	2.70	2,025.00	Billable
2/3/2016 105820	RSG / batt-depo defend Final scheduling for deposition (.3); review transcripts from prior depositions (3.0).	750.00	3.30	2,475.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
2/8/2016 105826	RSG □/batt-disc resp Receive and review requests for verification of responses, protective order and such	750.00	2.60	1,950.00	Billable
2/26/2016 105821	RSG □/batt-depo defend Review notice of deposition of [redacted] (.3); review and follow up on specific requests for [redacted] (1.8)	750.00	2.10	1,575.00	Billable
3/1/2016 105822	RSG □/batt-depo defend Work on deposition preparation for, review and assess discovery responses	750.00	1.70	1,275.00	Billable
3/3/2016 105823	RSG □/batt-depo defend Work on deposition preparation and discovery responses	750.00	2.00	1,500.00	Billable
3/7/2016 105824	RSG □/batt-depo defend Work on deposition preparation and discovery responses	750.00	3.80	2,850.00	Billable
3/8/2016 105825	RSG □/batt-depo defend Prepare for deposition while traveling, meet with client and co-counsel for deposition prep and find discovery responses	750.00	8.10	6,075.00	Billable
3/9/2016 105829	RSG □/batt-depo defend Prepare for and attend [redacted] deposition and follow-up	750.00	9.20	6,900.00	Billable
3/15/2016 105827	RSG □/batt-disc resp Telephone conference with D. Lambrinos re new discovery responses	750.00	0.50	375.00	Billable
3/16/2016 105828	RSG □/batt-disc resp Work on new discovery responses; communicate with client and D. Lambrinos re same.	750.00	3.40	2,550.00	Billable
3/18/2016 105830	RSG □/batt-settle Review lead counsel's correspondence re settlement; review terms of settlement in preparation for client approval.	750.00	4.30	3,225.00	Billable
4/5/2016 105831	RSG □/batt-disc resp Correspond with co-counsel and experts re electronic transfer of [redacted] docs	750.00	1.50	1,125.00	Billable

BATT:Young v. LG Chem, LTD (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
4/6/2016 105832	RSG □/batt-disc resp Review information provided by co-counsel in preparation for client document review and further discovery responses	750.00	1.10	825.00	Billable
4/7/2016 105833	RSG □/batt-disc resp Review responses to document requests for client information, communicate with client	750.00	1.90	1,425.00	Billable
4/8/2016 105834	RSG □/batt-disc resp Conference call with client and lead counsel re discovery responses and follow-up	750.00	2.20	1,650.00	Billable
4/18/2016 105836	RSG □/batt-depo defend Review deposition transcript of [redacted]	750.00	5.30	3,975.00	Billable
4/20/2016 105835	RSG □/batt-disc resp Communicate with client re content of most recent discovery responses and obtain verification	750.00	1.70	1,275.00	Billable
12/19/2016 106048	RSG □/batt-settle Review and analysis of Hitachi-Maxell settlement.	750.00	2.00	1,500.00	Billable
12/20/2016 106049	RSG □/batt-settle Further review of Hitachi-Maxell settlement.	750.00	1.00	750.00	Billable
1/5/2017 106050	RSG □/batt-settle Review and analysis of NEC Settlement.	750.00	2.50	1,875.00	Billable
1/10/2017 106051	RSG □/batt-settle Conference with client and B. Siegel re settlements.	750.00	0.60	450.00	Billable
T□TAL	Billable Fees		1825.40		$817,360.50

Total of billable expense slips $0.00

BATT:Young v. LG Chem, LTD (continued)

Calculation of Fees and Costs

	Amount	Total
Fees Bill Arrangement: Slips By billing value on each slip.		
Total of billable time slips	$817,360.50	
Total of Fees (Time Charges)		$817,360.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$817,360.50
New Balance Current	$817,360.50	
Total New Balance		$817,360.50

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
GREEN & NOBLIN, P.C.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	0.00
Litigation Assessment	$50,000.00
Court Fees (Filing, etc.)	$2,032.00
Document Production	0.00
Experts/Consultants	0.00
Federal Express	$211.05
Transcripts (Hearing, Deposition, etc.)	$59.40
Investigation	0.00
Lexis/Westlaw	0000
Messenger/Delivery	$248.00
Photocopies – In House (capped at $0.20 per copy)	0.00
Photocopies – Outside	0.00
Postage	0.00
Service of Process	$78.75
Supplies	0.00
Telephone/Telecopier	0.00
Travel	$2,173.66
Miscellaneous	0.00
TOTAL:	$54,802.86

EXHIBIT 27

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JUDD B. GROSSMAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GROSSMAN LLP**

I, Judd B. Grossman, declare:

1. I am the Founder and Managing Partner of Grossman LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Plaintiff David Tolchin and as counsel for IPPs throughout the course of this litigation. The background and experience of Grossman LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Grossman LLP performed the following work: Preparation and defense of Plaintiff David Tolchin's deposition testimony; coordinating, drafting and completion of discovery responses, including interrogatories and document production; communicating with Plaintiff regarding terms of proposed settlements; and review of all proposed settlement agreements and communications with Plaintiff regarding duties to the class in settlement approval.

5. A summary of work performed by Grossman LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Judd B. Grossman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Grossman LLP and filed on May 26, 2017. (ECF No. 1813-18). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Grossman LLP since June 1, 2013 was 27.6, with a corresponding lodestar of $14,659.50 based on current rates.

7. Attached hereto as **Exhibit B** is a summary of the expenses Grossman LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Grossman LLP expended a total of $1,075.30 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Grossman LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Grossman LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019, at New York, New York.

/s/ Judd B. Grossman

Judd B. Grossman

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

EXHIBIT A

GROSSMAN LLP

ATTORNEYS AT LAW

Grossman LLP is a litigation law firm representing individual and corporate clients in a wide range of matters, including consumer-fraud class actions, complex commercial disputes, and securities litigation.

Class Actions

Grossman LLP's attorneys have a broad range of experience in all phases of litigating complex class actions from trial to appeals, including before the United States Supreme Court, resulting in recoveries for clients aggregating well over $1 billion.

The Firm's attorneys have taken on cutting edge issues resulting in landmark decisions. *See, e.g.*, *Ross v. Bernhard,* 396 U.S. 531 (establishing the right to a jury trial in shareholder derivative actions); *EBC I, In.c (eToys) v. Goldman, Sachs & Co.,* 5 N.Y.3d 11, 799 N.Y.S.2d 170 (2005) (holding for the first time that an Issuer may assert a cause of action for breach of fiduciary duty against an underwriter). And, acting as lead, or co-lead counsel, the Firm's lawyers have helped obtain substantial recoveries for shareholders. *See, e.g.*, *Caiafa v. Comverse Technology, Inc., 1:06-cv-01825* (E.D.N.Y.) ($225 million); *in re Salomon Brothers Treasury Litigation,* 91 Civ. 5471 (S.D.N.Y. 1994) (recovering $100 million for class of treasury note customers arising out of an alleged market squeeze); *in re First Executive Corporation Securities Litigation,* CV-89-7135 (C.D. Cal. 1994) (claims against Drexel and Michael Milken resulting in a $100 million recovery).

Grossman LLP's Senior Counsel, Stanley Grossman, has been a leader in the plaintiff's class-action bar for 40 years, and he was featured in the New York Law Journal article: "Top Litigators in Securities Field – A Who's Who of City's Leading Courtroom Combatants." In 2008, he argued before the United States Supreme Court in the landmark case *Stoneridge Inv. Partners, LLC v. Scientific-Atlanta, Inc.* 552 U.S. 148 (2008).

Civic Commitment

Grossman LLP's attorneys have demonstrated a firm commitment to civic responsibility and *pro bono* work. The Firm has provided free legal services in a variety of matters, from small cases, all the way to the United States Supreme Court, including in *American Tradition Partnership, Inc. v. Bullock*, No. 11-1179, a significant case dealing with critical issues concerning campaign-finance laws in the wake of the Supreme Court's *Citizens United* ruling in 2010, where Grossman LLP co-authored and filed an *amicus curiae* brief.

Stanley Grossman is recognized for his commitment to ethical practices and the enhanced quality of legal representation. He served for three years on the New York City Bar Association's Committee on Ethics, as well as on the Association's Judiciary Committee. He is also actively involved in civic affairs, having served as a director of the Appleseed Foundation, a national public advocacy group, and the Lincoln Center Institute for the Arts In Education. In 1999, he

was appointed by the Association of the Bar of the City of New York to chair a special Blue Ribbon Commission on the future of the City University of New York.

ATTORNEYS

Stanley Grossman

Stanley M. Grossman is Senior Counsel to Grossman LLP. He has litigated complex class actions for over 40 years, and is recognized as a leader in the bar. Mr. Grossman's broad experience has included trials of complex consumer and securities matters, as well as appellate work in federal and state courts across the country, resulting in recoveries for his clients aggregating well over $1 billion.

On an annual basis he has been named by *Super Lawyers Magazine* as an outstanding attorney in the United States, and was featured in an *New York Law Journal* article entitled *"Top Litigators in Securities Field — A Who's Who of City's Leading Courtroom Combatants"* (8/1/83). In 2008, he argued before the United States Supreme Court in the landmark case of *Stoneridge Investment Partners v. Scientific-Atlanta*.

Many courts have acknowledged on the record the high quality of the legal representation provided by Mr. Grossman to classes. For example, in *Gartenberg v. Merrill Lynch Asset Management, Inc.*, 79 Civ. 3123 (S.D.N.Y.), where Mr. Grossman was lead trial counsel for plaintiff, Judge Pollack noted at the completion of the trial (Tr. 507):

> *[I] can fairly say, having remained abreast of the law on the factual and legal matters that have been presented, that I know of no case that has been better presented so as to give the Court an opportunity to reach a determination, for which the Court thanks you.*

He has lectured to the profession on various occasions under the auspices of the Southern Federal Securities Institute, Columbia University School of Law, Duke University Law School, University of Arizona Law School, Brooklyn Law School, ALI-ABA, PLI, the New York State Bar Association, and the Association of the Bar of the City of New York. Mr. Grossman is the author of "Commentary: The Social Meaning of Shareholder Suits," 65 BROOKLYN LAW REV. (1999), among other articles.

Mr. Grossman has been active in numerous professional organizations. He is the former president of the National Association of Securities Attorneys ("NASCAT") – an organization of attorneys specializing in securities class action litigation. During his tenure, he represented NASCAT in meetings with the Chairman of the Securities and Exchange Commission, members of Congress and of the Executive Branch in furnishing input and commentary on legislation which became the Private Securities Litigation Reform Act of 1995 ("PSLRA"). In the summer of 1998, at the invitation of Chairman of the Judiciary Committee Henry Hyde, Mr. Grossman testified before Congress on proposed legislation dealing with "federalization of state class actions." Subsequent to the hearings, Mr. Grossman was requested to participate with Congressional counsel in drafting proposed legislation.

He has served as a member of the Judiciary Committee of the Association of the Bar of the City of New York, the Committee on Professional and Judicial Ethnics; State Courts of Superior Jurisdiction; and Trade and Antitrust. He is also a member of the Litigation Bar dealing with class actions at the American Bar Association.

Mr. Grossman is actively involved in local and national civic affairs. He has served as a director of the Lincoln Center Institute for the Arts in Education, as well as a member of the Appleseed Foundation, a national public interest advocacy group. In June, 1990, he was appointed by the Association of the Bar of the City of New York to chair a special Blue Ribbon Commission on the future of the City University of New York. Upon the publication of the Commission's Report, the President of the Association described it as "insightful, measured and persuasive . . . a striking example of the very best of what this Association can do."

Stanley Grossman graduated from Brooklyn Law School (J.D. 1967) and from New York University and College of the City of New York (B.B.A. 1964). He is admitted to practice in the U.S. Supreme Court, the U.S. Courts of Appeals for the First and Second Circuits, the U.S. District Courts for the Southern and Eastern Districts of New York, and New York.

Judd B. Grossman

Judd Grossman represents plaintiffs and defendants in a wide range of complex commercial cases, including consumer fraud, securities, insurance, antitrust, and art-related disputes in state and federal trial and appellate courts throughout the country. Prior to founding Grossman LLP, Mr. Grossman was a Counsel in the securities-litigation practice group of O'Melveny & Myers LLP, before joining the Dontzin Law Firm LLP, an international litigation boutique law firm.

Mr. Grossman graduated *cum laude* from the University of Pennsylvania, where he also received his law degree. Following law school, he served as a law clerk to the Hon. Jerome B. Simandle, currently the Chief Judge for the United States District Court for the District of New Jersey. He is admitted to practice in the U.S. Court of Appeals for the Second Circuit, the U.S. District Courts for the Southern and Eastern Districts of New York, New York and New Jersey.

Lindsay E. Hogan

Lindsay E. Hogan is a partner of Grossman LLP. She has experience in complex commercial litigation, representing corporate and individual clients in federal and state court and in arbitration proceedings. Prior to joining Grossman LLP, Ms. Hogan was an associate in the Business and Commercial Litigation Department at Gibbons, P.C., where she represented hedge funds, banks, and broker-dealers in all aspects of litigation arising out of complex financial transactions, and before that she practiced at a prominent California law firm. Ms. Hogan earned her law degree from Georgetown University Law Center, where she was a member of the Georgetown Journal of Legal Ethics and participated in the Institute for Public Representation. Lindsay earned her bachelor's degree from the University of California, Berkeley.

Kate Lucas

Kate Lucas is an associate of Grossman LLP. Ms. Lucas has experience in complex litigation and contract matters involving companies across a variety of industries, including entertainment, health care, insurance, and education. Prior to joining Grossman LLP, Ms. Lucas was an associate at Ropes & Gray LLP, where she focused on labor and employment law, including advising companies on compliance with state and federal employment laws, and assisting them with developing and implementing employment contracts and policies. Ms. Lucas has represented clients in arbitrations and in litigation before federal and state courts and agencies.

Ms. Lucas served as a judicial clerk to the Honorable J. Clifford Wallace of the United States Court of Appeals for the Ninth Circuit. She earned her law degree, *summa cum laude*, from George Washington University Law School, where she graduated in the top 2% of her class and was a two-year member of the George Washington University Law Review. Ms. Lucas graduated, *cum laude*, from Harvard University, where she earned her bachelor's degree in English and American Literature and Language.

Matthew A. Marcucci

Matthew Marcucci has experience litigating complex commercial cases in both federal and state courts. Before joining Grossman LLP, Mr. Marcucci was an associate at a boutique law firm in Manhattan where he represented clients in a diverse array of industries, including advertising, arts and entertainment, banking and finance, and hospitality. Mr. Marcucci graduated Fordham University School of Law, *cum laude*, and he received his B.A., *magna cum laude*, from the University of Pennsylvania. During law school, Mr. Marcucci served as the Senior Writing & Research Editor of the Fordham Intellectual Property, Media & Entertainment Law Journal, and as a Teaching Assistant for Legal Writing and Research. Matt has sung professionally, including a 2014 performance at Carnegie Hall.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
GROSSMAN LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	$1,075.30
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$1,075.30

EXHIBIT 28

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JUDD B. GROSSMAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF GROSSMAN LLP**

I, Judd B. Grossman, declare:

1. I am the Founder and Managing Partner of Grossman LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Plaintiff David Tolchin and as counsel for IPPs throughout the course of this litigation. The background and experience of Grossman LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Grossman LLP performed the following work: Preparation and defense of Plaintiff David Tolchin's deposition testimony; coordinating, drafting and completion of discovery responses, including interrogatories and document production; communicating with Plaintiff regarding terms of proposed settlements; and review of all proposed settlement agreements and communications with Plaintiff regarding duties to the class in settlement approval.

5. Attached hereto as **Exhibit B** is a billing summary of Grossman LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Grossman LLP during this period of time was 27.6, with a corresponding lodestar based on current rates of $14,659.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Grossman LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Grossman LLP has incurred during the course of this litigation. Grossman LLP expended a total of $1,075.30 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Grossman LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Grossman LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at New York, New York.

/s/ Judd B. Grossman

Judd B. Grossman

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

GROSSMAN LLP

ATTORNEYS AT LAW

Grossman LLP is a litigation law firm representing individual and corporate clients in a wide range of matters, including consumer-fraud class actions, complex commercial disputes, securities and antitrust litigation.

Class Actions

Grossman LLP's attorneys have a broad range of experience in all phases of litigating complex class cases from trial to appeals, including before the United States Supreme Court. The Firm's attorneys' broad experience has included trials of complex corporate and securities matters, as well as appellate work in federal and state courts across the country, resulting in recoveries for clients aggregating well over $1 billion.

The Firm's attorneys have taken on cutting edge issues resulting in landmark decisions. *See, e.g., Ross v. Bernhard*, 396 U.S. 531 (establishing the right to a jury trial in shareholder derivative actions); *EBC I, In.c (eToys) v. Goldman, Sachs & Co.*, 5 N.Y.3d 11, 799 N.Y.S.2d 170 (2005) (holding for the first time that an Issuer may assert a cause of action for breach of fiduciary duty against an underwriter). And, acting as lead, or co-lead counsel, the Firm's lawyers have helped obtain substantial recoveries for shareholders. *See, e.g., Caiafa v. Comverse Technology, Inc., 1:06-cv-01825* (E.D.N.Y.) ($225 million); *in re Salomon Brothers Treasury Litigation*, 91 Civ. 5471 (S.D.N.Y. 1994) (recovering $100 million for class of treasury note customers arising out of an alleged market squeeze); *in re First Executive Corporation Securities Litigation*, CV-89-7135 (C.D. Cal. 1994) (claims against Drexel and Michael Milken resulting in a $100 million recovery).

Grossman LLP's Senior Counsel, Stanley Grossman, has been a leader in the plaintiff's class action bar for 40 years, and he was featured in the New York Law Journal article: "Top Litigators in Securities Field – A Who's Who of City's Leading Courtroom Combatants." In 2008, he argued before the United States Supreme Court in the landmark case *Stoneridge Inv. Partners, LLC v. Scientific-Atlanta, Inc.* 552 U.S. 148 (2008).

Civic Commitment

Grossman LLP's attorneys have demonstrated a firm commitment to civic responsibility and *pro bono* work. The Firm has provided free legal services in a variety of matters, from small cases, all the way to the United States Supreme Court.

Grossman LLP co-authored and filed an *amicus curiae* brief with the United States Supreme Court in *American Tradition Partnership, Inc. v. Bullock*, No. 11-1179, a significant case dealing with critical issues concerning campaign-finance laws in the wake of the Supreme Court's *Citizens United* ruling in 2010.

Stanley Grossman is recognized for his commitment to ethical practices and the enhanced quality of legal representation. He served for three years on the New York City Bar Association's Committee on Ethics, as well as on the Association's Judiciary Committee. He is also actively

involved in civic affairs, having served as a director of the Appleseed Foundation, a national public advocacy group, and the Lincoln Center Institute for the Arts In Education. In 1999, he was appointed by the Association of the Bar of the City of New York to chair a special Blue Ribbon Commission on the future of the City University of New York.

Judd Grossman previously assisted in researching and writing an *amicus curiae* brief on behalf of the prevailing party in *Utah v. Evans*, 536 U.S. 452 (2002). Mr. Grossman also has advised Holocaust survivors seeking reparations for work performed in ghettos, he has represented Hurricane Katrina victims in connection with their efforts to obtain FEMA benefits, and, acting as a Special Prosecutor, he obtained a unanimous affirmance of a criminal conviction in *People v. Smith*, 849 N.Y.S.2d 789 (2d Dep't 2008). Mr. Grossman currently serves on the board of directors of Urban Arts Partnership, a nonprofit organization in New York that advances the academic and social development of underserved public-school students through art-based curricula. And he is a member of Lincoln Center Education, whose mission is to enrich academics through arts-integrated education.

ATTORNEYS

Stanley Grossman

Stanley M. Grossman is Senior Counsel to Grossman LLP. He has litigated complex securities and antitrust actions for over 40 years, and is recognized as a leader in the bar. Mr. Grossman's broad experience has included trials of complex corporate and securities matters, as well as appellate work in federal and state courts across the country, resulting in recoveries for his clients aggregating well over $1 billion.

For numerous consecutive years he has been named by *Super Lawyers Magazine* as an outstanding attorney in the United States, and he was featured in an *New York Law Journal* article entitled "*Top Litigators in Securities Field — A Who's Who of City's Leading Courtroom Combatants"* (8/1/83). In 2008, he argued before the United States Supreme Court in the landmark case of *Stoneridge Investment Partners v. Scientific-Atlanta*.

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> *[I] can fairly say, having remained abreast of the law on the factual and legal matters that have been presented, that I know of no case that has been better presented so as to give the Court an opportunity to reach a determination, for which the Court thanks you.*

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Judd B. Grossman

Judd Grossman is the Managing Partner of Grossman LLP. Mr. Grossman represents plaintiffs and defendants in a wide range of complex commercial cases, including consumer fraud, securities, insurance, antitrust, and art-related disputes in state and federal trial and appellate courts throughout the country. Prior to founding Grossman LLP, Mr. Grossman was a Counsel in the securities-litigation practice group of O'Melveny & Myers LLP, before joining the Dontzin Law Firm LLP, an international litigation boutique law firm. Mr. Grossman was named a New York Super Lawyers "Rising Star" for Litigation for each of the past three years.

Mr. Grossman graduated *cum laude* from the University of Pennsylvania, where he also received his law degree. Following law school, he served as a law clerk to the Hon. Jerome B. Simandle, currently the Chief Judge for the United States District Court for the District of New Jersey. He is admitted to practice in the U.S. Court of Appeals for the Second Circuit, the U.S. District Courts for the Southern and Eastern Districts of New York, New York and New Jersey.

Kate Lucas

Kate Lucas has experience in complex litigation and contract matters involving companies across a variety of industries, including entertainment, health care, insurance, and education. Prior to joining Grossman LLP, Ms. Lucas was an associate at Ropes & Gray LLP, where she focused on labor and employment law, including advising companies on compliance with state and federal employment laws, and assisting them with developing and implementing employment contracts and policies. Ms. Lucas has represented clients in arbitrations and in litigation before federal and state courts and agencies.

Ms. Lucas served as a judicial clerk to the Honorable J. Clifford Wallace of the United States Court of Appeals for the Ninth Circuit. She earned her law degree, *summa cum laude*, from George Washington University Law School, where she graduated in the top 2% of her class and was a two-year member of the George Washington University Law Review. Ms. Lucas graduated, *cum laude*, from Harvard University, where she earned her bachelor's degree in English and American Literature and Language.

Lindsay Hogan

Lindsay E. Hogan has experience in complex commercial litigation, representing corporate and individual clients in federal and state court and in arbitration proceedings. Prior to joining Grossman LLP, Lindsay was an associate in the Business and Commercial Litigation Department at Gibbons, P.C., where she represented hedge funds, banks, and broker-dealers in all aspects of litigation arising out of complex financial transactions, and before that she practiced at a prominent California law firm. Lindsay earned her law degree from Georgetown University Law Center, where she was a member of the Georgetown Journal of Legal Ethics and participated in the Institute for Public Representation. Lindsay earned her bachelor's degree from the University of California, Berkeley.

Amanda M.F. Bakale

Amanda M.F. Bakale has experience in complex commercial litigation, including intellectual-property matters, and she has represented clients from a variety of industries in federal and state courts. Prior to joining Grossman LLP, Amanda was an associate in the litigation department of Gibson, Dunn & Crutcher LLP, where she represented media and technology companies in all aspects of litigation. Amanda earned her law degree from New York University School of Law, where she served as a teaching assistant to President John Sexton and she was a founding member of the Intellectual Property and Entertainment Law Ledger. She also earned a master's degree in Law and Society from New York University. Amanda did her undergraduate studies at the University of Pittsburgh, where she was a member of Phi Beta Kappa and graduated magna cum laude with a bachelor's degree in physics, philosophy, and political science. Amanda serves on the Pro Bono Associate Advisory Board of Legal Services NYC, providing legal services to low-income New Yorkers.

EXHIBIT B

EXHIBIT B

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

Firm Name: Grossman LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Judd B. Grossman (P)					9.50										9.50	$600.00	$5,700.00
Lindsay E. Hogan (A)			6.30		10.10							1.70			18.10	$495.00	$8,959.50
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**6.30**	**0.00**	**19.60**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.70**	**0.00**	**0.00**	**27.60**		**$14,659.50**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**6.30**	**0.00**	**19.60**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.70**	**0.00**	**0.00**	**27.60**		**$14,659.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

GROSSMAN LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Judd B. Grossman	June 1, 2013 to February 28, 2017	$600
Lindsay E. Hogan	June 1, 2013 to February 28, 2017	$495

EXHIBIT D

(REDACTED)

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
GROSSMAN LLP
Detailed Billing Records
June 1, 2013 through February 28, 2017

DETAILED TIME REPORT (REDACTED)

Date	Name	Historical Billing Rate	Task Code	Description	Hours
1/7/2016	Lindsay E. Hogan (A)	$495	5	[redacted] (0.4) and preparation concerning same (3.7).	4.1
1/13/2016	Lindsay E. Hogan (A)	$495	5	[redacted]	6.0
1/14/2016	Judd B. Grossman (P)	$600	5	Attend and defend deposition of [redacted]	9.5
2/1/2016	Lindsay E. Hogan (A)	$495	3	Review updated verification and interrogatories.	0.4
3/2/2016	Lindsay E. Hogan (A)	$495	3	[redacted] on outstanding discovery to be produced and tax issues.	0.8
3/10/2016	Lindsay E. Hogan (A)	$495	3	Correspond with [redacted] regarding supplemental interrogatory responses and verification.	0.4
3/15/2016	Lindsay E. Hogan (A)	$495	3	Discussion with [redacted] regarding discovery materials and responses produced and necessary productions (1.9); and send follow up emails to [redacted] regrading discovery (0.2).	2.1

Date	Name	Historical Billing Rate	Task Code	Description	Hours
3/21/2016	Lindsay E. Hogan (A)	$495	3	Call with Co-Lead counsel and [redacted] regarding necessary discovery.	1.2
3/28/2016	Lindsay E. Hogan (A)	$495	3	Update and communicate with [redacted] concerning verification of interrogatories.	0.3
4/20/2016	Lindsay E. Hogan (A)	$495	3	Review and edit new interrogatory responses.	1.1
11/20/2016	Lindsay E. Hogan (A)	$495	12	[redacted]	0.4
11/28/2016	Lindsay E. Hogan (A)	$495	12	[redacted] (0.2).	1.1
1/5/2017	Lindsay E. Hogan (A)	$495	12	[redacted]	0.2
Total					**27.6**

(P) Partner
(OC) Of Counsel
(A) Associate
(PL) Paralegal
(LC) Law Clerk

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
GROSSMAN LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	$1,075.30
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$1,075.30

EXHIBIT 29

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DANIEL R. KARON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KARON LLC**

I, Daniel R. Karon, declare:

1. I am Partner of Karon LLC, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to IPPs throughout the course of this litigation. The background and experience of Karon LLC and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Karon LLC performed the following work: conducted T1 and T2 merits-based review, analysis and coding of Sony documents provided by custodians Greg King, Doug Kreifles, Steve Jaska, and Robert McCaul relating to meetings, worksheets and various other matters for use in depositions and class-certification briefings.

5. A summary of work performed by Karon LLC and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Daniel R. Karon in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Karon LLC and filed on May 26, 2017. (ECF No. 1813-19. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Karon LLC since June 1, 2013 was 277, with a corresponding lodestar of $96,950.00.

7. Attached hereto as **Exhibit B** is a summary of the expenses Karon LLC has incurred from June 1, 2013 to present, plus applicable case filing fees. Karon LLC expended a

total of $.00 in unreimbursed costs and expenses in connection with the prosecution of this case. I have reviewed the time and expenses reported by Karon LLC in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on 28th day of March, 2019 at Cleveland, Ohio.

/s/ Daniel R. Karon

Daniel R. Karon

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

Daniel R. Karon

Karon LLC
700 W. St. Clair Ave., Suite 200
Cleveland, OH 44113–1998
Telephone: (216) 622–1851
Facsimile: (216) 241–8175
E–mail: dkaron@karonllc.com
Web: www.karonllc.com

SUMMARY

Mr. Karon is a class-action trial attorney specializing in antitrust, consumer–fraud, and wage-and-hour litigation. He began his class-action career with Much Shelist Freed Denenberg Ament & Rubenstein, P.C. in Chicago. He now manages Karon LLC. He represents individuals in antitrust, consumer-fraud, wage-and-hour, and other class-actions, and he has represented domestic and international corporations in domestic and international antitrust class-action matters. He also defends corporations in consumer-fraud class actions.

Mr. Karon teaches class-action law as a lecturer in law at Columbia Law School. He has also been a lecturer in law at Cleveland State University's Cleveland-Marshall College of Law. He lectures on class-action law at multiple other law schools and serves on Loyola University Chicago School of Law's Institute for Consumer Antitrust Studies' U.S. Advisory Board. He chairs the ABA's National Institute on Class Actions, writes a bimonthly column for Law360, was an editorial board member and contributing author to the ABA's Litigation Section's *Class Actions Today-Jurisdiction to Resolution* magazine, was a member of the Ohio Association of Justice's Board of Trustees, and served as an editorial board member for the Ohio Academy of Justice's *Ohio Trial* magazine. He has published multiple law review and bar journal articles on class-action topics, and he lectures nationally on class actions for the ABA and other bar associations.

In addition to various antitrust and consumer-fraud class actions, Mr. Karon was extensively involved in the *LCD–TFT Indirect Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for $1.1 billion), *Vitamins Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that resolved for $2 billion), *NASDAQ Market-Makers Antitrust Litigation* (nationwide price-fixing class action that settled for $1.027 billion), *Cathode Ray Tubes (CRT) Antitrust Litigation* (nationwide price-fixing class action that settled for $586 million), *Monosodium Glutamate Antitrust Litigation* (nationwide price-fixing class action that settled for $130 million), *Methionine Antitrust Litigation* (nationwide price-fixing class action that settled for $101 million), and *Sorbates Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for $94.5 million). He serves or served as lead counsel in multiple cases, including *Magnesium Oxide Antitrust Litigation, Aftermarket Sheet Metal Indirect Purchaser Antitrust Litigation, City of Lorain v. Medical Mutual Insurance Co., Dairy Indirect-Purchaser Antitrust Litigation, Johnson v. Evangelical Lutheran Church of America, Schwartz v. Avis Rent-A-Car Corp., Klein v. Budget Rent-A-Car Group*, *Bausch & Lomb Contact Lens Product Liability Litigation* and *Schwartz v. Alltel Corp*. He was discovery co-chair in the *Bulk Graphite Antitrust Litigation,* class-certification co-chair in the *Pressure Sensitive Labelstock Antitrust Litigation,* and briefing co-chair in the *EPDM Antitrust Litigation* and *Carbon Black Antitrust Litigation.*

EDUCATION

J.D., 1991
Michael E. Moritz College of Law, The Ohio State University
Member, *The Ohio State Journal on Dispute Resolution*
Quarterfinalist, First-Year Moot Court Competition

B.A., Speech Communication, 1988
Certificate, Jewish Studies, 1988
Indiana University-Bloomington
Dean's List, 1984–1987

TEACHING EXPERIENCE

Lecturer in Law, Columbia Law School
Spring 2018–Present
Complex litigation and class-action law

Lecturer in Law, Cleveland-Marshall College of Law, Cleveland State University
February 2005–2007
Class-action law

Lecturer, Michael E. Moritz College of Law, The Ohio State University
February 2008–Present
Class-action law

Lecturer, Columbia Law School
February 2013–2017
Class-action law

Lecturer, University of Michigan Law School
October 2018
Class-action law

Lecturer, Vanderbilt Law School
April 2013
Class-action law

Lecturer, Notre Dame Law School
February 2015
Class-action law

Lecturer, Tulane Law School
November 2013
Class-action law

Lecturer, University of Georgia School of Law
November 2015
Class-action law

Lecturer, Benjamin N. Cardozo School of Law, Yeshiva University
April 2014
Class-action law

Lecturer, Loyola University Chicago School of Law
November 2013, February 2019
Class-action law

BAR ADMISSIONS

United States Court of Appeals for the Third Circuit 2016

United States District Court for the Eastern District of Michigan, 2015

United States Court of Appeals for the Sixth Circuit 2013

United States District Court for the Southern District of Ohio, 2004

United States District Court for the Northern District of Ohio, 1998

United States Court of Appeals for the Seventh Circuit, 1995

United States District Court for the Northern District of Illinois, 1991

Ohio, 1997

Illinois, 1991

CLASS-ACTION EXPERIENCE

Karon LLC, Cleveland, OH
Owner, 2014–Present

Goldman Scarlato Karon & Penny, P.C., Cleveland, OH
Owner, 2002–2014

Gallagher Sharp Fulton & Norman, Cleveland, OH
Attorney, 2000–2002

Law Offices of Daniel R. Karon, Cleveland, OH
Owner, 1998–2000

Much Shelist Freed Denenberg Ament & Rubenstein, P.C., Chicago, IL
Attorney, 1994–1998

PUBLICATIONS

"Can't We All Just Get Along?" Civility Across the V., THE BENCHER, May/June 2019

Editorial, *Simple Secrets for Writing a Killer Brief*, LAW360 (Feb. 28, 2019)

Class Action Strategy & Practice Guide, Chapter 8, Managing Multiple Class and Enforcement Actions (2019)

Editorial, *Simple Secrets for Improving Your CLE*, LAW360 (Nov. 14, 2018)

Editorial, *Kavanaugh and the Confirmation of Third-Branch Bias*, OurFuture.org (Oct. 9, 2018)

Editorial, *It's Prime Time for a Dose of Reality on Brett Kavanaugh*, LAW360 (Aug. 2, 2018)

Editorial, *After Trump's Policy Purges, Who Speaks for the Victims?*, LAW360 (May 2, 2018)

Editorial, *Why Contempt for the CFPB Is a Big Business Mistake*, LAW360 (Oct. 28, 2017)

Editorial, *How Plaintiffs and Defense Counsel Misperceive Each Other*, LAW360 (Sept. 25, 2017)

Why "Class Action Attorney Fees" Are Such Dirty Words, NATIONAL ASSOCIATION OF LEGAL FEE ANALYSIS (July 18, 2017)

Editorial, *Why "Class Action Attorney Fees" Are Such Dirty Words,* LAW360 (July 14, 2017)

Editorial, *Bundle Up Defense Counsel. Winter's Coming,* LAW360 IN-DEPTH (May 2, 2017)

Killing Class Actions Means Everybody Loses, THE CLS BLUE SKY BLOG—COLUMBIA LAW SCHOOL BLOG ON CORPORATIONS AND THE CAPITAL MARKETS, (Apr. 7, 2017)

The Death of Class Actions?, ACSBLOG, AMERICAN CONSTITUTION SOCIETY (Mar. 3, 2017)

Editorial, *Killing Class Actions Means Everybody Loses,* LAW360 (Mar. 17, 2017)

The "Fairness" in Class Action Litigation Act, 42:4 LITIGATION 8 (Summer 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight,* THE NATIONAL LAW JOURNAL, SUPREME COURT BRIEF (Apr. 25, 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight,* THE NATIONAL LAW JOURNAL (Apr. 25, 2016)

Editorial, *Federal Class-Action Reform Effort Courts Serious Risks,* CLEVELAND PLAIN DEALER (Nov. 20, 2015)

Is it CAFA or Kafka? Effectively Pleading Multistate Class-action cases after the Class Action Fairness Act, THE OHIO ASSOCIATION FOR JUSTICE QUARTERLY 21 (Oct. 2014)

Reflections from the 2013 National Institute on Class Actions, 24 ABA's CLASS ACTIONS & DERIVATIVE SUITS 1 (Fall 2013)

Suspicionless Strip Searches—What's Next?, 39:1 LITIGATION 8 (Winter 2013)

Ripped from the Headlines—Ten Lawyers Look at the Story, 38:2 LITIGATION 25 (Winter 2012)

"T'was Three Years After Twombly and All Through the Bar, Not a Plaintiff Was Troubled From Near or From Far." The Unremarkable Effect of the U.S. Supreme Court's Re-expressed Pleading Standard in Bell Atlantic Corp. v. Twombly, 44 U.S.F. L. REV. 571 (2010)

The Unremarkable Effect of Bell Atlantic Corp. v. Twombly on Pleading Class–Action Complaints, 11:2 ABA's COMM'L & BUS. LITIG. 6 (Spring 2010)

Is it CAFA or Kafka, AAJ's TRIAL MAGAZINE 24 (July 2009)

ABA's Consumer Protection Law Developments, Chapter 5 State Consumer Law, § 36 Ohio (2009).

"When Congress Gives You Lemons . . ." Plaintiffs' Attorneys are Forced by the Class Action Fairness Act to Devise Innovative New Ways to Prosecute Interstate Class Actions, PLAINTIFF MAGAZINE 1 (Feb. 2008)

Multi–State Class Actions After CAFA—Preserving Consumers' Rights by Pleading Creatively, ABA's CLASS ACTIONS TODAY 9 (2007)

"How Do You Take Your Multi–State, Class action Litigation? One Lump or Two?" Infusing State Class action Jurisprudence into Federal, Multi-State Class-Certification Analyses in a "CAFA-nated" World, 46 SANTA CLARA L. REV. 567 (2006)

Unjust Enrichment's Application to Consumer Price fixing, Class action Claims, 16 ABA's CLASS ACTIONS & DERIVATIVE SUITS 1 (Winter 2006)

Undoing the Otherwise Perfect Crime. Applying Unjust Enrichment to Consumer Price fixing Claims, 108 W. VA. L. REV. 395 (2005)

A Non-Class-action lawyer's Guide to Ohio Consumer Class Actions—Understanding the Basics and Recognizing Opportunities, 14:3 OHIO TRIAL 26 (2005)

Price Fixing and Market Allocation—What to Avoid, What to Watch For, 2.2 ABA'S ANTITRUST COUNSELOR 1 (2005)

"Your Honor, Tear Down that Illinois Brick Wall!" The National Movement Toward Indirect Purchaser Antitrust Standing and Consumer Justice, 30 WM. MITCHELL L. REV. 1351 (2004)

Price Fixing, Market Allocation and Bid Rigging Conspiracies: How to Counsel Your Clients to Detect Violations and Inform You of Potential Claims, 25 AMER. J. TRIAL ADVOC. 241 (2002)
Collusion Central. Helping Your Clients Deal with Price Fixers, 11:3 ABA'S BUS. L. TODAY 9 (2002)

A Practitioner's Primer on Securities Fraud Class Action Litigation, 69:6 CLEV. BAR J. 8 (1998)

Kicking Our Gift Horse in the Mouth—Arbitration and Arbitrator Bias: Its Source, Symptoms and Solutions, 7 OHIO ST. J. ON DISP. RESOL. 315 (1992)

Winning Isn't Everything, It's the Only Thing. Violence in Professional Sports: The Need for Federal Regulation and Criminal Sanctions, 25 IND. L. REV. 147 (1991)

SPEAKING ENGAGEMENTS

Program Chair and Moderator, "Who Needs *Playhouse Square*?" Class Certification from A(rsenio) to (O)Z: A Three-Act Play," Cleveland, OH, March 13, 2019, sponsored by the William K. Thomas Inns of Court

Program Chair and Moderator, ABA's 23rd Annual National Institute on Class Actions, "Second to None. Class Actions 101," "Write to the Point. Class Actions 201," Nashville, TN, October 17–18, 2019, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Speaker, AAJ's 2019 Annual Convention, "The Craft of Beautiful Legal Writing," San Diego, CA, July 28, 2019, sponsored by American Association for Justice

Speaker, "Class Actions 101," January 17, 2019, New York, NY, sponsored by the New York State Bar Association

Panelist, "Why Antitrust Matters," October 30, 2018, Cleveland, OH, sponsored by the ABA's Antitrust Section

Program Chair and Moderator, ABA's 22nd Annual National Institute on Class Actions, "Second to None. Class Actions 101," "Write to the Point. Class Actions 201," Chicago, IL, October 18–19, 2018, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, GMA Legal Conference, "What in the World was He Thinking? A Look Inside the Mind of a Plaintiff's Attorney, and How to Respond," February 26–27, 2018, sponsored by the Grocery Manufacturers Association

Plenary Moderator, ABA's Corporate Counsel Seminar, "Class Actions Scared Straight: Real Class-Action Stories, Strategies, and Solutions from Both Sides of the 'v.,'" La Quinta, CA, February 17, 2018, sponsored by the ABA's Corporate Counsel Section

Panelist, ABA Environmental & Energy, Mass Torts, and Products Liability Litigation Committees' Joint CLE Seminar, "Brave New World: Perspectives on the Regulatory and Legal Landscape One Year into Trump's Administration," January 27, 2018, Whistler, BC, sponsored by the ABA's Environmental & Energy, Mass Torts, and Products Liability Litigation Committees

Panelist, Harris Martin Plaintiff Opioid MDL Conference, "Third-Party Payor, Class, and Hospital Claims," January 8, 2018, sponsored by Harris Martin

Program Chair and Moderator, ABA's 21st Annual National Institute on Class Actions, "Debating the Language. Class Actions 101," "Let's Vote on It. Class Actions 201," "Join the Writing Revolution. Class Actions 301," "Build That Wall . . . or Maybe Not. H.R. 985 and the End of Class Actions?" Washington, DC, October 26–27, 2017, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Speaker, AAJ's 2017 Annual Convention, "How to Grow Your Practice by Recognizing Antitrust Cases" and "The Art of Beautiful Legal Writing," Boston, MA, July 22, 2017, sponsored by American Association for Justice

Speaker, AAJ Continuing Legal Education Conference, "The Future of Class Actions: Teamwork, Savvy Defense, and Smart Offense," Nashville, TN, May 11, 2017, sponsored by American Association for Justice

Panelist, GMA 2017 Legal Conference, "Fighting Back Against Class Action Litigation," San Diego, CA, February 27–28, 2017, sponsored by the Grocery Manufacturers Association
Panelist, OSBA Federal Courts & Practice Committee Bench Bar Conference, "Class Certification Analysis after *Duke* & *Comcast*, October 27–28, 2016, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA's 20th Annual National Institute on Class Actions, "'Coming Out!" It's Class Actions 101," "'Box the Trifecta.' Let's Play Class Actions 301," "'From Mirage to Immense.' The Genesis, Creation, and Evolution of Rule 23 with Professor Arthur Miller," and "'Hitting the Jackpot!' A One-on-One Class-Action Conversation with Judge Richard Posner," Las Vegas, NV, October 19–20, 2016, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "No BigLaw? No Problem! How Small-Firm Plaintiff and Defense Lawyers Are Managing Some of the Largest Class-Action Litigation Matters," May 27, 2016, sponsored by the ABA

Panelist, "Cross-Industry Interdisciplinary Summit on Class Actions," New York, NY, April 11–12, 2016, sponsored by American Conference Institute

Panelist, "Is this CAFA or Kafka? Multi-State Actions in a Time of Metamorphosis," Litigation Section Annual Conference, Chicago, IL, April 14, 2016, sponsored by the ABA

Program Chair and Moderator, ABA's 19th Annual National Institute on Class Actions, "'Who Dat?!' It's the Return of Class Actions 101 and Class Actions 201" and "You Have a Choice, *Picayune*—'Economic Loss' or 'No-Injury' Class Actions. Either Way, Does a Legal Claim Exist?" New Orleans, LA, October 22–23, 2015, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Program Chair, "Antitrust for Non-Antitrust Lawyers: How to Grow Your Business by Recognizing New Opportunities," National Teleseminar, January 15, 2015, sponsored by American Association for Justice

Program Chair and Moderator, ABA's 18th Annual National Institute on Class Actions, "Second to None. Class Actions 101" and "Who Needs *The Second City*?" Class Certification from A(kroyd) to (Lovit)Z: A Three-Act Play," Chicago, IL, October 23–24, 2014, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, Ohio Association of Justice's Annual Convention, "Class Actions for Non-Class Action Attorneys. How to Grow Your Business by Recognizing New Opportunities," Columbus, OH, May 8, 2014, sponsored by Ohio Association for Justice

Panelist, Article III Standing and Rule 23(b)(3) Certification: Emerging Litigation Trends, December 3, 2013, National Teleseminar, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 17th Annual National Institute on Class Actions, "Listen Co-Counsel, You'll Learn a Ton, It's Time for Class Actions 101" and "'Show Me the Money!!! . . . or Don't.' *Cy Pres* Recoveries, Requests for Attorneys' Fees, and Does This Amount to a Hill of Beans?" Boston, MA, October 23–24, 2013, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, Ohio State Bar Association's 2012 Great Lakes Antitrust Institute, "New Developments in Antitrust Law," Columbus, OH, November 2, 2012, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA's 16th Annual National Institute on Class Actions, "'The Class Definition that Works . . . or Does It?' Strategies for Pleading and Attacking Class Definitions—The Most Basic and Most Ignored Step in a Class-action lawsuit's Success or Failure," Chicago, IL October 25, 2012, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Program Chair and Moderator, "Reexamining the Class Action Practice and Considering Where it—Indeed, *We*—Go From Here," Chicago, IL, August 3, 2012, sponsored by the ABA

Moderator and Panelist, "Everything MDL. First-Hand Perspectives from MDL Panel Judges, MDL District Court Judges, and MDL Lawyers," Cleveland, OH, July 25, 2012, sponsored by the Cleveland Metropolitan Bar Association and the Federal Bar Association, Northern District of Ohio Chapter

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, January 31, 2012, sponsored by Strafford Publications

Panelist, "Trends in Federal Circuit Class Certification Rulings," National Teleseminar, January 19, 2012, Law Seminars International

Program Chair and Moderator, ABA's 15th Annual National Institute on Class Actions, "The Practice that Never Sleeps: Reexamining the Class action Practice and Considering Where it—Indeed, *We*—Go From Here," New York, NY, October 14, 2011, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, *Wal–Mart v. Dukes,* Practical Implications of the Supreme Court's Landmark Class Action Ruling, National Teleseminar, June 30, 2011, sponsored by Law Seminars International

Panelist, ABA's 59th Annual Antitrust Law Spring Meeting, "Guilt by Association? Trade Associations, Cartel Investigations, and *Twombly,*" Washington, D.C., March 30, 2011, sponsored by the ABA's Antitrust Law Section

Panelist, "Pleading and Defending Class Actions: Leveraging the Latest Developments in CAFA Removal Jurisdiction," National Teleseminar, December 8, 2010, sponsored by Strafford Publications

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, November 2, 2010, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 14th Annual National Institute on Class Actions, "'The Standard that Works . . . or Does It?' Deciding Choice–of–Law and Reliance/Causation/ Deception Standards in Multistate, Consumer fraud Class actions After CAFA," Chicago, IL, October 14, 2010, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Consumer Class action Litigation: Leveraging New Developments in Class Certification, Causation, and Reliance," National Teleseminar, April 20, 2010, sponsored by Strafford Publications

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, "A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes," Washington DC, November 20, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes, San Francisco, CA, October 30, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, August 11, 2009, sponsored by Strafford Publications

Panelist, "It Ain't Over Till it's Over: Litigating Class Actions After Class Certification and Before Trial," National Teleseminar, May 27, 2009, sponsored by ABA Litigation Section

Panelist, "Antitrust 101: Understanding, Pleading, and Defending Price fixing Claims," ABA Brown Bag Teleseminar, February 18, 2009, sponsored by the ABA's Section on Litigation

Panelist, "Pleading, Defending, and Settling Class Actions. Emerging Trends," National Teleseminar, December 9, 2008, sponsored by Strafford Publications

Panelist, Ohio State Bar Association's 2008 Antitrust Program, "When Opportunity Knocks . . . . Growing Your Business or Company's Bottom Line by Recognizing When, Whether, and How to Pursue Class action, Price fixing Claims," Columbus, OH, November 14, 2008, sponsored by the Ohio State Bar Association

Panelist and Moderator, ABA's 12th Annual National Institute on Class Actions, "'I Could Have Sworn It was CAFA, *not Kafka*!' The Metamorphosis of Pleading, Defending, and Settling Multi-State Class Actions—A Surreal-Life, Three-Act Play," New York, NY, November 7, 2008, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, October 31, 2008, sponsored by the Cleveland Bar Association

Panelist, "Pleading, Defending, and Settling Class Actions. Emerging Trends," National Teleseminar, May 13, 2008, sponsored by Strafford Publications

Panelist, Ohio Association for Justice's 2008 Annual Convention, "New Developments in Plaintiffs' Antitrust Law," Columbus, OH, May 9, 2008, sponsored by the Ohio Association for Justice

Lecturer, "Class Actions for Non-Class-action lawyers. Growing Your Business by Understanding the Basics and Recognizing Opportunities," Los Angeles, CA, February 21, 2008, sponsored by the Los Angeles County Bar Association

Panelist, "Class Action Removal Standards in Flux. New Litigation Strategies for Plaintiff and Defense Counsel," National Teleseminar, February 19, 2008, sponsored by Strafford Publications

Panelist and Moderator, ABA's 11th Annual National Institute on Class Actions, "The Nationwide Class: White Elephant, Endangered Species, or Alive and Well?" Chicago, IL, October 19, 2007, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panel Co–Chair, ABA's 2007 Annual Meeting, "'Is this CAFA or Kafka?' Multi–State Class Actions in a Time of Metamorphosis—A Surreal-Life, Three-Act Play," San Francisco, CA, August 9–12, 2007, sponsored by the ABA

Panelist, ABA's 2007 Litigation Section Annual Conference, "The Last Laugh-Perspectives on CAFA," San Antonio, TX, April 11–14, 2007, sponsored by the ABA

Lecturer, "Class Actions for Non–Class-action lawyers," Los Angeles, CA, February 23, 2007, sponsored by the Los Angeles County Bar Association

Moderator, ABA's 10th Annual National Institute on Class Actions, Chicago, IL, October 27, 2006, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, "The Business Litigation Seminar," Cleveland, OH, June 21, 2006, sponsored by the Cleveland Bar Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim," Cleveland, OH, June 16, 2006, sponsored by the Cleveland Chemical Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, June 6, 2006, sponsored by the Cleveland Bar Association

Lecturer/Panelist, "Civil Practice and Litigation Techniques in Federal and State Courts," Charleston, SC, May 31, 2006, sponsored by ALI-ABA

Lecturer, "Class Actions for Non–Class-action lawyers," Los Angeles, CA, February 25, 2006, sponsored by the Los Angeles County Bar Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, December 6, 2005, sponsored by the Cleveland Bar Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, November 18, 2005, sponsored by the Cuyahoga County Bar Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business-How to Avoid Being a Victim," Pittsburgh, PA, November 11, 2005, sponsored by the Pittsburgh Chemical Association

Moderator, "ABA's 9th Annual National Institute on Class Actions," Chicago, IL, September 23, 2005, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business-How to Avoid Being a Victim," Cleveland, OH, September 16, 2005, sponsored by the Cleveland Chemical Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business–How to Avoid Being a Victim," Vail, CO, July 26, 2005, sponsored by the OC Chemical Dealers' Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, May 20, 2005, sponsored by the Cleveland Bar Association

Lecturer, "Class Actions for Non-Class-action lawyers," Miami, FL, May 13, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, "Class Actions for Non-Class-action lawyers: Understanding the Basics and Recognizing Opportunities," Phoenix, AZ, March 25, 2005, sponsored by the Maricopa County Bar Association

Lecturer, "Class Actions for Non-Class-action lawyers," Chicago, IL, January 21, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, "Recognizing Class Action Opportunities," Columbus, OH, December 12, 2004, sponsored by the Columbus Bar Association

Lecturer, "Class Actions: Understanding the Basics and Recognizing Opportunities," Cleveland, OH, May 28, 2004, sponsored by the Cleveland Bar Association
Lecturer, "Select Topics for Trial Lawyers, A Primer on Class Actions for the Non–Class Action Litigator in New York," New York, NY, August 11, 2004, sponsored by Lorman Educational Services, Eau Claire, WI

Lecturer, "The Business Litigation Seminar—Advanced Tactics and Motions," Cleveland, OH, December 12, 2003, sponsored by the Cleveland Bar Association

Lecturer, "Community Litigation Workshop," Detroit, MI, June 5, 1998, sponsored by the Firearms Litigation Clearinghouse, Washington D.C.

PROFESSIONAL ACTIVITIES

American Bar Association, 2003–Present
- Chairperson, National Institute on Class Actions, 2010–Present
- Litigation Section, Co-Chair, Class Action and Derivative Suits Committee's Antitrust Subcommittee, 2007–2008
- Antitrust Section, 2008–2010

Contributor, A. Scalia & B. Garner, *Reading Law: The Interpretation of Legal Texts* (2012)

Law360, Columnist, 2017–Present

American Society of Writers on Legal Subjects, 2004–Present
- Law Review Award Committee, 2004–2009
- Brief-Writing Committee, 2004–2009

American Association for Justice, 1998–Present
Co-Chair, Class Action Litigation Group, 2018–Present
Co-Vice Chair, Class Action Litigation Group, 2016–2018
Secretary, Class Action Litigation Group, 2015–2016
Litigation Group Leaders Council, 2018–Present
Co-Chair, Antitrust Subcommittee, 2016–Present
Vice Co–Chair, Antitrust Subcommittee, 2015–2016
ABA Liaison Committee, 2014–Present
Rule 23 Subcommittee, 2014–Present

Loyola Chicago Consumer Law Review Advisory Board, 2018–Present

The William K. Thomas American Inn of Court—American Inns of Court, 2018–Present

Class Action Trial Lawyers' Association, 2011–Present
Executive Committee, 2011–Present

Cleveland Bar Association, 1997–2009

National Association for Consumer Advocates, 2003–2013

BOARD MEMBERSHIPS AND CIVIC ACTIVITIES

Ohio Association for Justice, 2003–Present
Board of Trustees, 2012–2016
Chair, Consumer Law Section, 2014–2016

Cleveland Metropolitan Bar Association, Multidistrict Litigation Task Force, 2010–2012

Consumer-law correspondent, Your Legal Minute with the Lovable Lawyer, The Weekly Pulse, WKYC-Cleveland, 2018–Present

Loyola University Chicago School of Law, Institute for Consumer Antitrust Studies' U.S. Advisory Board, 2004–Present

IUvisors Student Advisors, Indiana University Alumni Foundation, 2014–Present

Antitrust Section Council Member, Ohio State Bar Association, 2007–Present
Great Lakes Antitrust Institute Planning Committee, 2013

Cleveland Legal Aid Society
Volunteer Attorney, 2014–2016

Public Justice, 2011–Present

Editorial Board, Ohio Academy of Trial Lawyers' *Ohio Trial* Magazine, 2004–2010

Class Action Advisory Board, Strafford Legal Publications, 2008–Present

Editorial Board, American Bar Association, Litigation Section's *Class Actions Today. Jurisdiction to Resolution* (special publication), 2007–2008

Assistant Coach, Northern Ohio Warriors Traveling Youth Baseball Club, 2014–2016

Fellow, Litigation Counsel of America Trial Lawyer Honorary Society, 2008–2010

Women's Community Foundation, Men's Executive Committee, 2004–2010

Judge, Landskroner Foundation for Children's 9th Annual Law Student Closing Argument Competition, 2007

Anti-Defamation League's Steinberg Leadership Institute, 1998–2000

Associate Attorney's Committee Co-Chair, Lawyers' Division, Jewish Federation of Metropolitan Chicago, 1995–1997

DePaul University College of Law, Moot Court Judge, 1993–1994

Sigma Alpha Mu, Sigma Zeta Housing Corporation, 2004–2009

Young Leadership Board, Jewish Federation of Metropolitan Chicago, 1993–1997

Young Leadership Board, Jewish Community Federation of Cleveland, 1997–2000

HONORS AND AWARDS

Norvelle Scholarship for Academic Excellence, Indiana University, 1986

Ohio Super Lawyer, 2012–Present

Global Directory of Who's Who (Top Lawyer), 2015–Present

ABA Center for Professional Development Partner Appreciation Award Winner for Most Innovative Presentation, 2015

ABA Award for Outstanding Subcommittee Chair for the Class Actions & Derivative Suits Committee 2010–2011

Top Attorneys of North America, 2017–Present

Best Lawyers in America, Mass Tort Litigation/Class Actions—Plaintiffs, 2018–Present

Martindale-Hubbell AV Preeminent® Peer-Review Rating (reflecting combination of very high general ethical standards and legal ability and measuring legal knowledge, analytical capabilities, judgment, communication ability, and legal experience), 2012–Present

AcademicKeys Who's Who in Law Higher Education, 2017–Present

US News Best Lawyers–Best Law Firms, 2019

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
KARON LLC
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	0.00
Court Fees (Filing, etc.)	0.00
Experts/Consultants	0.00
Online document database	0.00
Federal Express	0.00
Hearing Transcripts	0.00
Investigation	0.00
Lexis/Westlaw	0.00
Messenger/Delivery	0.00
Photocopies – In House (capped at $0.20 per copy)	0.00
Photocopies – Outside	0.00
Postage	0.00
Service of Process	0.00
Special Supplies	0.00
Telephone/Telecopier	0.00
Travel	0.00
Miscellaneous	0.00
TOTAL:	$0.00

EXHIBIT 30

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DANIEL R. KARON IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KARON LLC**

I, Daniel R. Karon, declare:

1. I am managing partner of Karon LLC Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to the Indirect Purchaser Plaintiffs throughout the course of this litigation. The background and experience of Karon and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Karon LLC performed the following work: Conducted T1 and T2 merits-based review, analysis and coding of Sony documents provided by custodians Greg King, Doug Kreifles, Steve Jaska, Hameed Chaudhury, Alan Sund, Marcel VandenBogert, Jisette Tran, Tomoya Hayakawa, Robert McCaul, Christopher Bourassa, Aki Hasegawa, Jack Hamilton, and Ronnie Tao relating to meetings, worksheets and various other matters for use in depositions and class-certification briefings.

5. Attached hereto as **Exhibit B** is a billing summary of Karon LLC's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Karon LLC during this period of time was 277, with a corresponding lodestar based on current rates of $96,950.00 The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Karon LLC.

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

7. Attached hereto as **Exhibit D** is a compilation of my firm's detailed records at historical billing rates.

8. Karon LLC expended a total of $0.00 in unreimbursed costs and expenses in connection with the prosecution of this case and is not seeking any reimbursement of costs or expenses.

9. I have reviewed the time and expenses reported by Karon LLC in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Cleveland, Ohio.

/s/Daniel R. Karon

Daniel R. Karon

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Daniel R. Karon

Karon LLC
700 W. St. Clair Ave., Suite 200
Cleveland, OH 44113–1998
Telephone: (216) 622–1851
Facsimile: (216) 241–8175
E–mail: dkaron@karonllc.com
Web: www.karonllc.com

SUMMARY

Mr. Karon is a class-action trial attorney specializing in antitrust, consumer–fraud, and wage-and-hour litigation. He began his class-action career with Much Shelist Freed Denenberg Ament & Rubenstein, P.C. in Chicago. He now manages Karon LLC. He represents individuals in antitrust, consumer-fraud, wage-and-hour, and other class-actions, and he has represented domestic and international corporations in domestic and international antitrust class-action matters. He also defends corporations in consumer-fraud class actions.

Mr. Karon teaches class-action law as a lecturer in law at Columbia Law School. He has also been a lecturer in law at Cleveland State University's Cleveland-Marshall College of Law. He lectures on class-action law at multiple other law schools and serves on Loyola University Chicago School of Law's Institute for Consumer Antitrust Studies' U.S. Advisory Board. He chairs the ABA's National Institute on Class Actions, writes a bimonthly column for Law360, was an editorial board member and contributing author to the ABA's Litigation Section's *Class Actions Today-Jurisdiction to Resolution* magazine, was a member of the Ohio Association of Justice's Board of Trustees, and served as an editorial board member for the Ohio Academy of Justice's *Ohio Trial* magazine. He has published multiple law review and bar journal articles on class-action topics, and he lectures nationally on class actions for the ABA and other bar associations.

In addition to various antitrust and consumer-fraud class actions, Mr. Karon was extensively involved in the *LCD–TFT Indirect Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for $1.1 billion), *Vitamins Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that resolved for $2 billion), *NASDAQ Market-Makers Antitrust Litigation* (nationwide price-fixing class action that settled for $1.027 billion), *Cathode Ray Tubes (CRT) Antitrust Litigation* (nationwide price-fixing class action that settled for $586 million), *Monosodium Glutamate Antitrust Litigation* (nationwide price-fixing class action that settled for $130 million), *Methionine Antitrust Litigation* (nationwide price-fixing class action that settled for $101 million), and *Sorbates Direct Purchaser Antitrust Litigation* (nationwide price-fixing class action that settled for $94.5 million). He also serves or served as lead counsel in *Magnesium Oxide Antitrust Litigation, Aftermarket Sheet Metal Indirect Purchaser Antitrust Litigation, Dairy Indirect-Purchaser Antitrust Litigation, Johnson v. Evangelical Lutheran Church of America, Schwartz v. Avis Rent-A-Car Corp., Klein v. Budget Rent-A-Car Group*, *Bausch & Lomb Contact Lens Product Liability Litigation* and *Schwartz v. Alltel Corp.* He was discovery co-chair in the *Bulk Graphite Antitrust Litigation,* class-certification co-chair in the *Pressure Sensitive Labelstock Antitrust Litigation,* and briefing co-chair in the *EPDM Antitrust Litigation* and *Carbon Black Antitrust Litigation.*

EDUCATION

J.D., 1991
Michael E. Moritz College of Law, The Ohio State University
Member, *The Ohio State Journal on Dispute Resolution*
Quarterfinalist, First-Year Moot Court Competition

B.A., Speech Communication, 1988
Certificate, Jewish Studies, 1988
Indiana University-Bloomington
Dean's List, 1984–1987

TEACHING EXPERIENCE

Lecturer in Law, Columbia Law School
Spring 2018
Complex litigation and class-action law

Lecturer in Law, Cleveland-Marshall College of Law, Cleveland State University
February 2005–2007
Class-action law

Lecturer, Michael E. Moritz College of Law, The Ohio State University
February 2008–Present
Class-action law

Lecturer, Columbia Law School
February 2013–2017
Class-action law

Lecturer, Vanderbilt Law School
April 2013
Class-action law

Lecturer, Notre Dame Law School
February 2015
Class-action law

Lecturer, Tulane Law School
November 2013
Class-action law

Lecturer, University of Georgia School of Law
November 2015
Class-action law

Lecturer, Benjamin N. Cardozo School of Law, Yeshiva University
April 2014
Class-action law

Lecturer, Loyola University Chicago School of Law
November 2013
Class-action law

BAR ADMISSIONS

United States Court of Appeals for the Third Circuit 2016

United States District Court for the Eastern District of Michigan, 2015

United States Court of Appeals for the Sixth Circuit 2013

United States District Court for the Southern District of Ohio, 2004

United States District Court for the Northern District of Ohio, 1998

United States Court of Appeals for the Seventh Circuit, 1995

United States District Court for the Northern District of Illinois, 1991

Ohio, 1997

Illinois, 1991

CLASS-ACTION EXPERIENCE

Karon LLC, Cleveland, OH
Owner, 2014–Present

Goldman Scarlato Karon & Penny, P.C., Cleveland, OH
Owner, 2002–2014

Gallagher Sharp Fulton & Norman, Cleveland, OH
Attorney, 2000–2002

Law Offices of Daniel R. Karon, Cleveland, OH
Owner, 1998–2000

Much Shelist Freed Denenberg Ament & Rubenstein, P.C., Chicago, IL
Attorney, 1994–1998

PUBLICATIONS

Bundle Up Defense Counsel. Winter's Coming, LAW360 IN-DEPTH (May 2, 2017)

Killing Class Actions Means Everybody Loses, THE CLS BLUE SKY BLOG—COLUMBIA LAW SCHOOL'S BLOG ON CORPORATIONS AND THE CAPITAL MARKETS, (Apr. 7, 2017)

The Death of Class Actions?, ACSBLOG, AMERICAN CONSTITUTION SOCIETY (Mar. 3, 2017)

Killing Class Actions Means Everybody Loses, LAW360 (Mar. 17, 2017)

The Class Action Fairness Act: Law and Strategy, Chapter 9 (2016)

The "Fairness" in Class Action Litigation Act, 42:4 LITIGATION 8 (Summer 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight,* THE NATIONAL LAW JOURNAL, SUPREME COURT BRIEF (Apr. 25, 2016)

Editorial, *Dow Chemical's Post-Scalia Settlement is a Spin Doctor's Delight,* THE NATIONAL LAW JOURNAL (Apr. 25, 2016)

Editorial, *Federal Class-Action Reform Effort Courts Serious Risks,* CLEVELAND PLAIN DEALER (Nov. 20, 2015)

Is it CAFA or Kafka? Effectively Pleading Multistate Class-action cases after the Class Action Fairness Act, THE OHIO ASSOCIATION FOR JUSTICE QUARTERLY 21 (Oct. 2014)

Reflections from the 2013 National Institute on Class Actions, 24 ABA's CLASS ACTIONS & DERIVATIVE SUITS 1 (Fall 2013)

Suspicionless Strip Searches—What's Next?, 39:1 LITIGATION 8 (Winter 2013)

Ripped from the Headlines—Ten Lawyers Look at the Story, 38:2 LITIGATION 25 (Winter 2012)

"T'was Three Years After Twombly and All Through the Bar, Not a Plaintiff Was Troubled From Near or From Far." The Unremarkable Effect of the U.S. Supreme Court's Re-expressed Pleading Standard in Bell Atlantic Corp. v. Twombly, 44 U.S.F. L. REV. 571 (2010)

The Unremarkable Effect of Bell Atlantic Corp. v. Twombly on Pleading Class–Action Complaints, 11:2 ABA's COMM'L & BUS. LITIG. 6 (Spring 2010)

Is it CAFA or Kafka, AAJ's TRIAL MAGAZINE 24 (July 2009)

ABA's Consumer Protection Law Developments, Chapter 5 State Consumer Law, § 36 Ohio (2009).

"When Congress Gives You Lemons . . ." Plaintiffs' Attorneys are Forced by the Class Action Fairness Act to Devise Innovative New Ways to Prosecute Interstate Class Actions, PLAINTIFF MAGAZINE 1 (Feb. 2008)

Multi–State Class Actions After CAFA—Preserving Consumers' Rights by Pleading Creatively, ABA's CLASS ACTIONS TODAY 9 (2007)

"How Do You Take Your Multi–State, Class action Litigation? One Lump or Two?" Infusing State Class action Jurisprudence into Federal, Multi-State Class-Certification Analyses in a "CAFA-nated" World, 46 SANTA CLARA L. REV. 567 (2006)

Unjust Enrichment's Application to Consumer Price fixing, Class action Claims, 16 ABA's CLASS ACTIONS & DERIVATIVE SUITS 1 (Winter 2006)

Undoing the Otherwise Perfect Crime. Applying Unjust Enrichment to Consumer Price fixing Claims, 108 W. VA. L. REV. 395 (2005)

A Non-Class-action lawyer's Guide to Ohio Consumer Class Actions—Understanding the Basics and Recognizing Opportunities, 14:3 OHIO TRIAL 26 (2005)

Price Fixing and Market Allocation—What to Avoid, What to Watch For, 2.2 ABA'S ANTITRUST COUNSELOR 1 (2005)

"Your Honor, Tear Down that Illinois Brick Wall!" The National Movement Toward Indirect Purchaser Antitrust Standing and Consumer Justice, 30 WM. MITCHELL L. REV. 1351 (2004)

Price Fixing, Market Allocation and Bid Rigging Conspiracies: How to Counsel Your Clients to Detect Violations and Inform You of Potential Claims, 25 AMER. J. TRIAL ADVOC. 241 (2002)

Collusion Central. Helping Your Clients Deal with Price Fixers, 11:3 ABA'S BUS. L. TODAY 9 (2002)

A Practitioner's Primer on Securities Fraud Class Action Litigation, 69:6 CLEV. BAR J. 8 (1998)

Kicking Our Gift Horse in the Mouth—Arbitration and Arbitrator Bias: Its Source, Symptoms and Solutions, 7 OHIO ST. J. ON DISP. RESOL. 315 (1992)

Winning Isn't Everything, It's the Only Thing. Violence in Professional Sports: The Need for Federal Regulation and Criminal Sanctions, 25 IND. L. REV. 147 (1991)

SPEAKING ENGAGEMENTS

Speaker, AAJ's 2017 Annual Convention, "How to Grow Your Practice by Recognizing Antitrust Cases" and "The Art of Beautiful Legal Writing," July 22, 2017, sponsored by AAJ

Speaker, AAJ Continuing Legal Education Conference, "The Future of Class Actions: Teamwork, Savvy Defense, and Smart Offense," May 11, 2017, sponsored by AAJ

Panelist, GMA 2017 Legal Conference, "Fighting Back Against Class Action Litigation," February 27–28, 2017, sponsored by the Grocery Manufacturers Association

Panelist, OSBA Federal Courts & Practice Committee Bench Bar Conference, "Class Certification Analysis after *Duke* & *Comcast*, October 27–28, 2016, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA's 20th Annual National Institute on Class Actions, "'Coming Out!" It's Class Actions 101," "'Box the Trifecta.' Let's Play Class Actions 301," "'From Mirage to Immense.' The Genesis, Creation, and Evolution of Rule 23 with Professor Arthur Miller," and "'Hitting the Jackpot!' A One-on-One Class-Action Conversation with Judge Richard Posner," Las Vegas, NV, October 19–20, 2016, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "No BigLaw? No Problem! How Small-Firm Plaintiff and Defense Lawyers Are Managing Some of the Largest Class-Action Litigation Matters," May 27, 2016, sponsored by the ABA

Panelist, "Cross-Industry Interdisciplinary Summit on Class Actions," New York, NY, April 11–12, 2016, sponsored by American Conference Institute

Panelist, "Is this CAFA or Kafka? Multi-State Actions in a Time of Metamorphosis," Litigation Section Annual Conference, Chicago, IL, April 14, 2016, sponsored by the ABA

Program Chair and Moderator, ABA's 19th Annual National Institute on Class Actions, "'Who Dat?!' It's the Return of Class Actions 101 and Class Actions 201" and "You Have a Choice, *Picayune*—'Economic Loss' or 'No-Injury' Class Actions. Either Way, Does a Legal Claim Exist?" New Orleans, LA, October 22–23, 2015, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Program Chair, "Antitrust for Non-Antitrust Lawyers: How to Grow Your Business by Recognizing New Opportunities," National Teleseminar, January 15, 2015, sponsored by American Association for Justice

Program Chair and Moderator, ABA's 18th Annual National Institute on Class Actions, "Second to None. Class Actions 101" and "Who Needs *The Second City*?" Class Certification from A(kroyd) to (Lovit)Z: A Three-Act Play," Chicago, IL, October 23–24, 2014, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, Ohio Association of Justice's Annual Convention, "Class Actions for Non-Class Action Attorneys. How to Grow Your Business by Recognizing New Opportunities," Columbus, OH, May 8, 2014, sponsored by Ohio Association for Justice

Panelist, Article III Standing and Rule 23(b)(3) Certification: Emerging Litigation Trends, December 3, 2013, National Teleseminar, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 17th Annual National Institute on Class Actions, "Listen Co-Counsel, You'll Learn a Ton, It's Time for Class Actions 101" and "'Show Me the Money!!! . . . or Don't.' *Cy Pres* Recoveries, Requests for Attorneys' Fees, and Does This Amount to a Hill of Beans?" Boston, MA, October 23–24, 2013, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, Ohio State Bar Association's 2012 Great Lakes Antitrust Institute, "New Developments in Antitrust Law," Columbus, OH, November 2, 2012, sponsored by the Ohio State Bar Association

Program Chair and Moderator, ABA's 16th Annual National Institute on Class Actions, "'The Class Definition that Works . . . or Does It?' Strategies for Pleading and Attacking Class Definitions—The Most Basic and Most Ignored Step in a Class-action lawsuit's Success or Failure," Chicago, IL October 25, 2012, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Program Chair and Moderator, "Reexamining the Class Action Practice and Considering Where it—Indeed, *We*—Go From Here," Chicago, IL, August 3, 2012, sponsored by the ABA

Moderator and Panelist, "Everything MDL. First-Hand Perspectives from MDL Panel Judges, MDL District Court Judges, and MDL Lawyers," Cleveland, OH, July 25, 2012, sponsored by the Cleveland Metropolitan Bar Association and the Federal Bar Association, Northern District of Ohio Chapter

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, January 31, 2012, sponsored by Strafford Publications

Panelist, "Trends in Federal Circuit Class Certification Rulings," National Teleseminar, January 19, 2012, Law Seminars International

Program Chair and Moderator, ABA's 15th Annual National Institute on Class Actions, "The Practice that Never Sleeps: Reexamining the Class action Practice and Considering Where it—Indeed, *We*—Go From Here," New York, NY, October 14, 2011, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, *Wal–Mart v. Dukes,* Practical Implications of the Supreme Court's Landmark Class Action Ruling, National Teleseminar, June 30, 2011, sponsored by Law Seminars International

Panelist, ABA's 59th Annual Antitrust Law Spring Meeting, "Guilt by Association? Trade Associations, Cartel Investigations, and *Twombly,*" Washington, D.C., March 30, 2011, sponsored by the ABA's Antitrust Law Section

Panelist, "Pleading and Defending Class Actions: Leveraging the Latest Developments in CAFA Removal Jurisdiction," National Teleseminar, December 8, 2010, sponsored by Strafford Publications

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, November 2, 2010, sponsored by Strafford Publications

Program Chair and Moderator, ABA's 14th Annual National Institute on Class Actions, "'The Standard that Works . . . or Does It?' Deciding Choice–of–Law and Reliance/Causation/ Deception Standards in Multistate, Consumer fraud Class actions After CAFA," Chicago, IL, October 14, 2010, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Consumer Class action Litigation: Leveraging New Developments in Class Certification, Causation, and Reliance," National Teleseminar, April 20, 2010, sponsored by Strafford Publications

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, "A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes," Washington DC, November 20, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist and Moderator, ABA's 13th Annual National Institute on Class Actions, A Funny Thing Happened on the Way to the Courthouse . . . I Had to Litigate an Arbitration Clause! Crafting, Opposing, and Arguing Arbitration Clauses and Class action Waivers in Three Scenes, San Francisco, CA, October 30, 2009, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panelist, "Litigating Class Actions Between Class Certification and Trial," National Teleseminar, August 11, 2009, sponsored by Strafford Publications

Panelist, "It Ain't Over Till it's Over: Litigating Class Actions After Class Certification and Before Trial," National Teleseminar, May 27, 2009, sponsored by ABA Litigation Section

Panelist, "Antitrust 101: Understanding, Pleading, and Defending Price fixing Claims," ABA Brown Bag Teleseminar, February 18, 2009, sponsored by the ABA's Section on Litigation

Panelist, "Pleading, Defending, and Settling Class Actions. Emerging Trends," National Teleseminar, December 9, 2008, sponsored by Strafford Publications

Panelist, Ohio State Bar Association's 2008 Antitrust Program, "When Opportunity Knocks . . . . Growing Your Business or Company's Bottom Line by Recognizing When, Whether, and How to Pursue Class action, Price fixing Claims," Columbus, OH, November 14, 2008, sponsored by the Ohio State Bar Association

Panelist and Moderator, ABA's 12th Annual National Institute on Class Actions, "'I Could Have Sworn It was CAFA, *not Kafka*!' The Metamorphosis of Pleading, Defending, and Settling Multi-State Class Actions—A Surreal-Life, Three-Act Play," New York, NY, November 7, 2008, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, October 31, 2008, sponsored by the Cleveland Bar Association

Panelist, "Pleading, Defending, and Settling Class Actions. Emerging Trends," National Teleseminar, May 13, 2008, sponsored by Strafford Publications

Panelist, Ohio Association for Justice's 2008 Annual Convention, "New Developments in Plaintiffs' Antitrust Law," Columbus, OH, May 9, 2008, sponsored by the Ohio Association for Justice

Lecturer, "Class Actions for Non-Class-action lawyers. Growing Your Business by Understanding the Basics and Recognizing Opportunities," Los Angeles, CA, February 21, 2008, sponsored by the Los Angeles County Bar Association

Panelist, "Class Action Removal Standards in Flux. New Litigation Strategies for Plaintiff and Defense Counsel," National Teleseminar, February 19, 2008, sponsored by Strafford Publications

Panelist and Moderator, ABA's 11th Annual National Institute on Class Actions, "The Nationwide Class: White Elephant, Endangered Species, or Alive and Well?" Chicago, IL, October 19, 2007, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Panel Co–Chair, ABA's 2007 Annual Meeting, "'Is this CAFA or Kafka?' Multi–State Class Actions in a Time of Metamorphosis—A Surreal-Life, Three-Act Play," San Francisco, CA, August 9–12, 2007, sponsored by the ABA

Panelist, ABA's 2007 Litigation Section Annual Conference, "The Last Laugh-Perspectives on CAFA," San Antonio, TX, April 11–14, 2007, sponsored by the ABA

Lecturer, "Class Actions for Non–Class-action lawyers," Los Angeles, CA, February 23, 2007, sponsored by the Los Angeles County Bar Association

Moderator, ABA's 10th Annual National Institute on Class Actions, Chicago, IL, October 27, 2006, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Lecturer, "The Business Litigation Seminar," Cleveland, OH, June 21, 2006, sponsored by the Cleveland Bar Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business—How to Avoid Being a Victim," Cleveland, OH, June 16, 2006, sponsored by the Cleveland Chemical Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, June 6, 2006, sponsored by the Cleveland Bar Association

Lecturer/Panelist, "Civil Practice and Litigation Techniques in Federal and State Courts," Charleston, SC, May 31, 2006, sponsored by ALI-ABA

Lecturer, "Class Actions for Non–Class-action lawyers," Los Angeles, CA, February 25, 2006, sponsored by the Los Angeles County Bar Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, December 6, 2005, sponsored by the Cleveland Bar Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, November 18, 2005, sponsored by the Cuyahoga County Bar Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business-How to Avoid Being a Victim," Pittsburgh, PA, November 11, 2005, sponsored by the Pittsburgh Chemical Association

Moderator, "ABA's 9th Annual National Institute on Class Actions," Chicago, IL, September 23, 2005, sponsored by the ABA's Litigation Section's Class Action and Derivative Suits Committee

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business-How to Avoid Being a Victim," Cleveland, OH, September 16, 2005, sponsored by the Cleveland Chemical Association

Featured Speaker, "Price Fixing and Market Allocation Schemes in the Commodity Chemicals Business–How to Avoid Being a Victim," Vail, CO, July 26, 2005, sponsored by the OC Chemical Dealers' Association

Lecturer, "Class Actions: Growing Your Business by Understanding the Basics and Recognizing Opportunities," Cleveland, OH, May 20, 2005, sponsored by the Cleveland Bar Association

Lecturer, "Class Actions for Non-Class-action lawyers," Miami, FL, May 13, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, "Class Actions for Non-Class-action lawyers: Understanding the Basics and Recognizing Opportunities," Phoenix, AZ, March 25, 2005, sponsored by the Maricopa County Bar Association

Lecturer, "Class Actions for Non-Class-action lawyers," Chicago, IL, January 21, 2005, sponsored by Lighthouse Seminar Group, Dallas, TX

Lecturer, "Recognizing Class Action Opportunities," Columbus, OH, December 12, 2004, sponsored by the Columbus Bar Association

Lecturer, "Class Actions: Understanding the Basics and Recognizing Opportunities," Cleveland, OH, May 28, 2004, sponsored by the Cleveland Bar Association

Lecturer, "Select Topics for Trial Lawyers, A Primer on Class Actions for the Non–Class Action Litigator in New York," New York, NY, August 11, 2004, sponsored by Lorman Educational Services, Eau Claire, WI

Lecturer, "The Business Litigation Seminar—Advanced Tactics and Motions," Cleveland, OH, December 12, 2003, sponsored by the Cleveland Bar Association

Lecturer, "Community Litigation Workshop," Detroit, MI, June 5, 1998, sponsored by the Firearms Litigation Clearinghouse, Washington D.C.

PROFESSIONAL ACTIVITIES

American Bar Association, 2003–Present
Chairperson, National Institute on Class Actions, 2010–Present
Litigation Section, Co-Chair, Class Action and Derivative Suits Committee's Antitrust Subcommittee, 2007–2008
Antitrust Section, 2008–2010

Contributor, A. Scalia & B. Garner, *Reading Law: The Interpretation of Legal Texts* (2012)

Law360, Columnist, 2017–Present

American Society of Writers on Legal Subjects, 2004–Present
Law Review Award Committee, 2004–2009
Brief-Writing Committee, 2004–2009

American Association for Justice, 1998–Present
Co-Vice Chair, Class Action Litigation Group, 2016–Present
Secretary, Class Action Litigation Group, 2015–2016
Co-Chair, Antitrust Subcommittee, 2016–Present
Vice Co–Chair, Antitrust Subcommittee, 2015–2016
ABA Liaison Committee, 2014–Present
Rule 23 Subcommittee, 2014–Present

Class Action Trial Lawyers' Association, 2011–Present
Executive Committee, 2011–Present

Cleveland Bar Association, 1997–2009

National Association for Consumer Advocates, 2003–Present

BOARD MEMBERSHIPS AND CIVIC ACTIVITIES

Ohio Association for Justice, 2003–Present
Board of Trustees, 2012–2016
Chair, Consumer Law Section, 2014–2016

Cleveland Metropolitan Bar Association, Multidistrict Litigation Task Force, 2010–2012

Loyola University Chicago School of Law, Institute for Consumer Antitrust Studies' U.S. Advisory Board, 2004–Present

IUvisors Student Advisors, Indiana University Alumni Foundation, 2014–Present

Antitrust Section Council Member, Ohio State Bar Association, 2007–Present
Great Lakes Antitrust Institute Planning Committee, 2013

Cleveland Legal Aid Society
Volunteer Attorney, 2014–2016

Public Justice, 2011–Present

Editorial Board, Ohio Academy of Trial Lawyers' *Ohio Trial* Magazine, 2004–2010

Class Action Advisory Board, Strafford Legal Publications, 2008–Present

Editorial Board, American Bar Association, Litigation Section's *Class Actions Today. Jurisdiction to Resolution* (special publication), 2007–2008

Assistant Coach, Northern Ohio Warriors Traveling Youth Baseball Club, 2014–2016

Fellow, Litigation Counsel of America Trial Lawyer Honorary Society, 2008–2010

Women's Community Foundation, Men's Executive Committee, 2004–2010

Judge, Landskroner Foundation for Children's 9th Annual Law Student Closing Argument Competition, 2007

Anti-Defamation League's Steinberg Leadership Institute, 1998–2000

Associate Attorney's Committee Co-Chair, Lawyers' Division, Jewish Federation of Metropolitan Chicago, 1995–1997

DePaul University College of Law, Moot Court Judge, 1993–1994

Sigma Alpha Mu, Sigma Zeta Housing Corporation, 2004–2009

Young Leadership Board, Jewish Federation of Metropolitan Chicago, 1993–1997

Young Leadership Board, Jewish Community Federation of Cleveland, 1997–2000

HONORS AND AWARDS

Norvelle Scholarship for Academic Excellence, Indiana University, 1986

Ohio Super Lawyer, 2012–Present

Global Directory of Who's Who (Top Lawyer), 2015–Present

ABA Center for Professional Development Partner Appreciation Award Winner for Most Innovative Presentation, 2015

ABA Award for Outstanding Subcommittee Chair for the Class Actions & Derivative Suits Committee 2010–2011

Top Attorneys of North America, 2017–Present

EXHIBIT B

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

Firm Name: Karon LLC

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Natalie Kabasakalian (OC)							277.00								277.00	$350.00	$96,950.00
															0.00	$0.00	$0.00
SUB-TOTAL															0.00	$0.00	$0.00
	0.00	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**277.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**277.00**		**$96,950.00**
SUB-TOTAL																	
GRAND TOTAL:															0.00	$0.00	$0.00
	0.00	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
	0.00	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**277.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**277.00**		**$96,950.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

C

TT E	D TE E	H TE
Natalie Kabasakalian	11/21/14-1/30/15	$350
_		

TT E	D TE E	H TE

EXHIBIT D

LIB Indirect Litigation
Karon LLC
Detailed Time Report
06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
Timekeeper: Kabasakalian						
LIB Indirect	Kabasakalian	10/1/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000017367-000017472, Sony custodian Hameed Chaudhury, Bates Nos. SONY-LIB000020763-000020777, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021556-000021571.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/2/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021572-000021586, Sony custodian Greg King, Bates Nos. SONY-LIB000021944-000021983, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022530-000022529.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022532-000022599.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/6/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023951-000024052.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/7/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000025071-000025099, Sony Custodian Marcel VandenBogert, Bates Nos. SONY-LIB000026016-000026023.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/8/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Marcel VandenBogert, Bates Nos. SONY-LIB000026024-000026052, Sony Custodians Alan Sund and Jisette Tran, Bates Nos. SONY-LIB 000037153-000037155, Sony custodian Alan Sund, Bates Nos. SONY-LIB000037156-000037168.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/9/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Alan Sund and Jisette Tran, Bates No. SONY-LIB000037171, Sony custodian Alan Sund, Bates Nos. SONY-LIB000037172-000037176, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000039125-000039127, Sony custodian Greg King, Bates Nos. SONY-LIB000039282-000040344.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000040399-000040405, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041980-000042082, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000068243-68250, Sony custodian Hameed Chaudhury, Bates No. SONY-LIB0000688222, Sony custodian Steve Jaska, Bates Nos. SONY-LIB0000069812-000069817.	4.00	$1,400.00

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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/13/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070126-000070305, Sony custodian Christopher Bourassa, Bates No. SONY-LIB000070948, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072366-000072411, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000082683-000082684, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000085406-000090013, Sony custodians Robert McCaul, Alan Sund, and Steve Jaska, Bates Nos. SONY-LIB000091744-000091756, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000091758-000098330.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/14/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Hameed Chaudhury, Bates No. SONY-LIB000105146, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000105406-000105417, Sony custodian Greg King, Bates Nos. SONY-LIB000105464-000105469, Sony custodian Doug Kreifles, Bates No. SONY-LIB000105742, Sony custodian Alan Sund, Bates Nos. SONY-LIB000109963-000110052, Sony custodian Steve Jaske, Bates Nos. SONY-LIB000123072-000123256, Sony custodians Robert McCaul and Alan Sund, Bates No. SONY-LIB000129965, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200N, Sony custodian Steve Jaska, Bates No. 000123258N, Sony custodian Robert McCaul, Bates Nos. 000070126N-000070301N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/15/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates No. 000123281, Sony custodian Robert McCaul, Bates No. 000125313, Sony custodians Robert McCaul and Alan Sund, Bates No. SONY-LIB 000129965, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000105200N, Sony custodian Steve Jaska, Bates No. SONY-LIB000123258N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB00070126N-000070301N, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000082683N-00008330N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/16/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawy, Bates Nos. SONY-LIB000141584-000141585, Sony custodian Greg King, Bates Nos. SONY-LIB000143370, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000157802-000157804, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000159048-000185856.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000185856-000157894N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000159051N-000185856N, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000050583-000052501.	4.00	$1,400.00

LIB Indirect Litigation
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(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/20/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000053801-000053951.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/21/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054001-000054088, Sony custodian Greg King, Bates Nos. SONY-LIB000055135-000055796.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/22/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000055798-000055831, Sony custodian Alan Sund, Bates Nos. SONY-LIB000058961-000059016.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/23/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000059017-000062162, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000066130-67556.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000058961N-000059151N, Sony custodian Greg King, Bates Nos. SONY-LIB000039283-000039284, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041816-000041871.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/27/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041773-000041890, Sony custodian Chaudhury Hameed, Bates Nos. SONY-LIB000068823-000041921.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/28/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000059087-00005907N, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022579-000022568, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000041942, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022567, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000017447-000017451.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/29/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000061903-000079317N, Sony custodian Alan Sund, Bates Nos. SONY-LIB000059046-0000109973N.	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	10/30/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019549-000019556, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000075693-000075701, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000081009-000081024N, Sony custodian Christopher Bourassa, Bates Nos. SONY-LIB000045245-000042005.	4.00	$1,400.00
LIB Indirect	Kabasakalian	10/31/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019607-000019562, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000078068-000076301, Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000127619-0000127619N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000075944-000059090, Sony custodian Steve Jaske, Bates Nos. SONY-LIB000114275-000114274N, Sony custodian Jack Hamilton, Bates Nos. SONY-LIB000019637-000019644, Sony custodians Greg King and Steve Jaska, Bates No. SONY-LIB000055039.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/4/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000037177-000081545, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000081433-81403.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/5/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tran Jisette, Bates Nos. SONY-LIB000075592-000075633, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000077947-000069808.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/6/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000068238-000068238N, Sony custodian Greg King, Bates Nos. SONY-LIB0000105454-0000105459, Sony custodian Chaudhury Hameed, Bates Nos. SONY-LIB000020804-000020787, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000055030-000055031, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072907-000072963.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/7/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000072963-00007560, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000075662-000075677, Sony custodian Alan Sund, Bates Nos. SONY-LIB0000072964N-000073085N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates No. SONY-LIB0000143371, Sony custodian Aki Hasegawa, Bates Nos. SONY-LIB000037949-unnumbered document.	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
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Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	11/11/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/12/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/13/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/14/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Greg King, Aki Hasegawa, Robert McCaul – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/18/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/19/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Alan Sund, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, company background, Internet HTMLs, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/20/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Adobe Acrobat (PDF), expense and travel records, company background, Microsoft Excel 2000, phone records/directories/Rolodex, expense and travel records (Bates numbers unavailable).	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
Detailed Time Report
06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	11/21/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, Christopher Bourassa, Marcel VandenBogert, Doug Kreifles, Greg King, Aki Hasegawa – Adobe Acrobat (PDF), expense and travel records, phone records/directories/Rolodex, calendars, diaries, dayplanners, Microsoft Outlook Message File, outlook appointment (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	11/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Marcel VandenBogert, Christopher Bourassa, Steve Jaska, Robert McCaul, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files(Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/2/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, Alan Sund, Greg King, Aki Hasegawa – Outlook appointments, Adobe Acrobat (PDF), calendars, diaries, dayplanners, Microsoft message files, Microsoft PowerPoint 97/98 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/3/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Hameed Chaudhury, Christopher Bourassa, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/4/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Hameed Chaudhury, Greg King, Aki Hasegawa – Outlook appointments, calendars, diaries, dayplanners, Microsoft message files, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/5/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Robert McCaul, Aki Hasegawa, Doug Kreifles – prices/policy pricing, Adobe Acrobat (PDF), Outlook appointments, Microsoft PowerPoint 97/98, Microsoft Excel 2000 (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/8/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Steve Jaska, Alan Sund, Doug Kreifles – plain textcalendars, diaries, dayplanners, Adobe Acrobat (PDF), Microsoft message files (Bates numbers unavailable).	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/9/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, 000089327-000089470.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/10/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodians Robert McCaul, 000065512-000170046.	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
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06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	12/11/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054574-000054538.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/12/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054546-000105394.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/15/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000105395-000105401, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023719-000159191, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000148971-000105209N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/16/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000021483-000039256, Sony custodian Greg King, Bates Nos. SONY-LIB000039462-000039466.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/17/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates Nos. SONY-LIB000039444-000039425, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000190068-000144865, Sony custodian Greg King, Bates Nos. SONY-LIB000039423-000039395.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/18/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg King, Bates Nos. SONY-LIB000039396-000039394, Sony custodian Alan Sund, Bates Nos. SONY-LIB000025077-000040652, Sony custodian Robert McCaul, Bates No. SONY-LIB000023965, Sony custodian Greg King, Bates Nos. SONY-LIB000039393-000039403.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/19/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000129942-00013042, Sony custodian Greg King, Bates Nos. SONY-LIB000039389-000039392, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070134-000040505.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/22/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000023969-000174491, Sony custodian Greg King, Bates No. SONY-LIB 000039294, Sony custodian Robert McCaul, Bates No. SONY-LIB 000023979, Sony custodian Greg King, Bates Nos. SONY-LIB000039296 -000039301, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB 0000105208, Sony custodian Greg King, Bates Nos. SONY-LIB000039289-000039305, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000070140-000039304, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054080-000054082.	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
Detailed Time Report
06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	12/23/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000144908-000056124, Sony custodian Greg King, Bates No. SONY-LIB 000039311, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054052-0000540521.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/24/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054022-000054024, Sony custodian Greg King, Bates Nos. SONY-LIB000039276-000105461.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/29/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates No. SONY-LIB000024011, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000036901-000105382.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/30/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000105450-000084965, Sony custodian Greg King, Bates Nos. SONY-LIB000039375-000039385, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123280-000123280N, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB000053946, Sony custodian Robert McCaul, Bates Nos. SONY-LIB0000174552-000174527.	4.00	$1,400.00
LIB Indirect	Kabasakalian	12/31/2014	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000174528-000174502N.	2.00	$700.00
LIB Indirect	Kabasakalian	1/4/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Jisette Tran, Bates Nos. SONY-LIB00115240-000115244, Sony custodian Greg King, Bates Nos. SONY-LI 000039380-000039382.	8.00	$2,800.00
LIB Indirect	Kabasakalian	1/5/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123264-00008201, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106177-000106172, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062186-000105424.	4.00	$1,400.00

LIB Indirect Litigation
Karon LLC
Detailed Time Report
06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	1/6/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Emi Crochiere, Bates No. SONY-LIB000058510, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000039260-000123279, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106181-000196182, Sony custodian Tomoya Hayakawa, Bates No. SONY-LIB0001053880, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106167-000123009, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000127031-000089940, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000122942-000082027, Sony custodian Jisette Tran, Bates Nos. SONY-LIB000115280-000061758.	4.00	$1,400.00
LIB Indirect	Kabasakalian	1/8/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062418-000123278N, Sony custodian Alan Sund, Bates Nos. SONY-LIB000024936-000024949, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000171089-000090122.	4.00	$1,400.00
LIB Indirect	Kabasakalian	1/11/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000024926-000024925, Sony custodian Tomota Hayakawa, Bates Nos. SONY-LIB000071835-000071836N.	4.00	$1,400.00
LIB Indirect	Kabasakalian	1/12/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates No. SONY-LIB0000105448, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022891-000022890, Sony custodian Alan Sund, Bates Nos. SONY-LIB000072783-000072784N, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB00016184-000022884, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022885-000022886, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000058452-000058455.	4.00	$1,400.00
LIB Indirect	Kabasakalian	1/26/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Steve Jaska, Bates Nos. SONY-LIB000123256-000157800, Sony custodian Robert McCaul, Bates No. SONY-LIB000022883, Sony custodian Steve Jaska, Bates No. SONY-LIB000062161, Sony custodian Alan Sund, Bates No. SONY-LIB000040541, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062169-000062184, Sony custodian Alan Sund, Bates Nos. SONY-LIB000040540-000052385.	3.00	$1,050.00
LIB Indirect	Kabasakalian	1/27/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022875-000022862, Sony custodian Alan Sund, Bates Nos. SONY-LIB000073134-000073150N, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022858-000022851.	3.00	$1,050.00

LIB Indirect Litigation
Karon LLC
Detailed Time Report
06-01-13 thru 02-28-17
(Historic Rates)

Client	Attorney	Date	Activity	Description	Hours	Value
LIB Indirect	Kabasakalian	1/28/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022847-000022811.	3.00	$1,050.00
LIB Indirect	Kabasakalian	1/29/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Alan Sund, Bates Nos. SONY-LIB000109954-000109952, Sony custodian Ronnie Tao, Bates Nos. SONY-LIB000106180-00061832, Sony custodian Robert McCaul, Bates Nos. SONY-LIB000022801-00022809, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062117-000062118, Sony custodian Ronnie Tao, Bates No. SONY-LIB000106185, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062111-00062109, Sony custodian Emi Crochiere, Bates No. SONY-LIB000058496, Sony custodian Steve Jaska, Bates No. SONY-LIB000062119, Sony custodian Alan Sund, Bates No. SONY-LIB000058950, Sony custodian Steve Jaska, Bates Nos. SONY-LIB000062121-000062113, Sony custodian Greg King, Bates No. SONY-LIB000039386.	3.00	$1,050.00
LIB Indirect	Kabasakalian	1/30/2015	07 - Document Review	Conducted T1 and T2 merits-based review, analysis, and coding of documents from Sony custodian Greg Kind, Bates Nos. SONY-LIB000040276-000040330, Sony custodian Doug Kreifles, Bates Nos. SONY-LIB000022635-000022653, Sony custodian Tomoya Hayakawa, Bates Nos. SONY-LIB000054018-000054014, Sony custodian Greg King, Bates No. SONY-LIB000143453.	3.00	$1,050.00
Total: Kabasakalian					277.00	$96,950.00
Grand Total					277.00	$96,950.00

EXHIBIT 31

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ERIC A. GROVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KELLER GROVER LLP**

I, ERIC A. GROVER, declare:

1. I am a founding partner of Keller Grover LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. Keller Grover LLP has served as counsel for IPPs throughout the course of this litigation. Keller Grover is a law firm that specializes in matters involving antitrust, consumer protection, data privacy, and plaintiffs'-side employment issues. The firm is also active in the area of whistleblower and *qui tam* actions. Keller Grover's two partners (each of whom has more than thirty years of experience) have been counsel in scores of cases that have resulted in the recovery of hundreds of millions of dollars on behalf of class members in antitrust, consumer, privacy, and employment class actions. Lawyers in the firm regularly litigate matters throughout California state and federal courts and federal courts around the United States.

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

4. During the pendency of the litigation, Keller Grover LLP performed the following work: extensive document review from the voluminous documents produced by defendants in this case, responding to written discovery, including interrogatories, and preparing for and defending the full-day deposition of Keller Grover's client, Richard Johns.

5. Detailed billing records and a summary of the work performed by Keller Grover LLP from June 1, 2013 through February 28, 2017 were submitted with the Declaration of Eric A. Grover in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Keller Grover LLP filed on May 26, 2017. (ECF No.

1813–20. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Keller Grover LLP since June 1, 2013 was 942.30, with a corresponding lodestar of $290,370.00. The lodestar amount reflected in the summary and detailed billing records submitted on May 26, 2017 (ECF No. 1813–20) represents work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Keller Grover LLP.

7. Attached hereto as **Exhibit A** is a summary of the expenses Keller Grover LLP has incurred during the court of this litigation. The only pre-June 1, 2013 expense that is included is the $350.00 fee associated with the filing of the initial complaint on behalf of Keller Grover LLP's client. The two other expenses included in the summary relate to the deposition of Keller Grover LLP's client and were incurred in 2016. Keller Grover LLP expended a total of $2,474.85 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Keller Grover LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit A** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

8. I have reviewed the time and expenses reported by Keller Grover LLP in this case which are included in this declaration and the declaration submitted on May 26, 2017, and I affirm that they are true and accurate.

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

Executed on April 12, 2019, at San Francisco, California.

/s/ Eric A. Grover

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

NAME: Keller Grover LLP

IN RE: LITHIUM ION BATTERIES INDIRECT
MONTHLY COSTS REPORT

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Court Costs	Specialized Legal			$350.00
Hearing Transcripts	Client Depo Trans.			$2,090.85
Miscellaneous	Parking (Depo)			$34.00
TOTAL				$2,474.85

EXHIBIT 32

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ERIC A. GROVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KELLER GROVER LLP**

I, ERIC A. GROVER, declare:

1. I am a founding partner of Keller Grover LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Richard Johns and as counsel for IPPs throughout the course of this litigation. Keller Grover LLP specializes in matters involving antitrust, consumer protection, data privacy and plaintiffs'-side employment issues. Keller Grover's two partners (each of whom has more than twenty five years of experience) have recovered hundreds of millions of dollars on behalf of class members. The firm is also active in the area of whistleblower and *qui tam* actions. Lawyers in the firm regularly litigate matters throughout California and around the United States.

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

4. During the pendency of the litigation, Keller Grover LLP performed the following work: extensive document review from the voluminous documents produced by Defendants in this case, responding to written discovery, including interrogatories, and preparing and defending the full-day deposition of Keller Grover's client, Richard Johns.

5. Attached hereto as **Exhibit A** is a billing summary of Keller Grover LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Keller Grover LLP during this period of time was 942.30, with a corresponding lodestar of $290,370.00. The lodestar amount reflected in Exhibit A is for work assigned by Lead Counsel,

and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Keller Grover LLP.

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

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

8. Attached hereto as **Exhibit D** is a summary of the expenses Keller Grover LLP has incurred during the course of this litigation. Keller Grover LLP expended a total of $2,726.95 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Keller Grover LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit D** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Keller Grover LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on 23rd of May, 2017 at San Francisco, California.

/s/ Eric A. Grover

ERIC A. GROVER

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

IN RE: LITHIUM ION BATTERIES INDIRECT

REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Firm Name: KELLER GROVER LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	HOURLY RATE	TOTAL LODESTAR
Kathleen R. Scanlan (A)	0.00	0.00	2.00	0.00	11.50	0.00	0.00	0.00	9.00	0.00	2.80	0.30	0.00	0.00	25.60	$600.00	$15,360.00
Rachel Perez (A)	0.00	0.00	0.00	0.00	0.00	0.00	916.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	916.70	$300.00	$275,010.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**2.00**	**0.00**	**11.50**	**0.00**	**916.70**	**0.00**	**9.00**	**0.00**	**2.80**	**0.30**	**0.00**	**0.00**	**942.30**	**$900.00**	**$290,370.00**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**$0.00**	**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**2.00**	**0.00**	**11.50**	**0.00**	**916.70**	**0.00**	**9.00**	**0.00**	**2.80**	**0.30**	**0.00**	**0.00**	**942.30**	**$900.00**	**$290,370.00**

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation

KELLER GROVER LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Kathleen R. Scanlan	6/1/13-4/30/15	$575.00
Kathleen R. Scanlan	5/1/15-2/28/17	$600.00
Rachel Perez	6/1/13-2/28/17	$300.00
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

Selection Criteria

Clie.Selection	Include: Li-Ion Batterie
Slip.Transaction Date	6/1/2013 - 2/28/2017
Time.Selection	Include: K. Scanlan; R. Perez

Rate Info - identifies rate source and level

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
67032	TIME	R. Perez	8.00	300.00	2400.00
3/10/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents regarding motion to dismiss; amended complaint in preparation of reviewing documents (1.50); participated in training conference call (6.50).			0.00		
67033	TIME	R. Perez	7.00	300.00	2100.00
3/11/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed conference materials and completed review of amended complaint in preparation of reviewing documents (2.00); document review (5.00).			0.00		
67034	TIME	R. Perez	7.00	300.00	2100.00
3/12/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch LG_EN_0001.			0.00		
67036	TIME	R. Perez	4.00	300.00	1200.00
3/13/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch LG_EN_0001.			0.00		
67038	TIME	R. Perez	8.00	300.00	2400.00
3/14/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch LG_EN_0001.			0.00		
67039	TIME	R. Perez	7.75	300.00	2325.00
3/17/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch LG_EN_0001.			0.00		
67041	TIME	R. Perez	8.00	300.00	2400.00
3/18/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch LG_EN_0001.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
67042 3/19/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
67043 3/20/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
67044 3/21/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.00 0.00 0.00 0.00	300.00 T@3	2100.00
67045 3/24/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
67046 3/25/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
67047 3/26/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	1.00 0.00 0.00 0.00	300.00 T@3	300.00
68569 6/3/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.00 0.00 0.00 0.00	300.00 T@3	1200.00
68570 6/4/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.00 0.00 0.00 0.00	300.00 T@3	2100.00
68571 6/5/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
68572 6/6/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.00 0.00 0.00 0.00	300.00 T@3	1200.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
68573 6/7/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	2.00 0.00 0.00 0.00	300.00 T@3	600.00
68574 6/8/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	2.00 0.00 0.00 0.00	300.00 T@3	600.00
68575 6/9/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
68576 6/10/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
68876 6/11/2014 WIP Reviewed documents from batch LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
68877 6/12/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
68878 6/13/2014 WIP Review documents LG_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.00 0.00 0.00 0.00	300.00 T@3	1200.00
68881 6/15/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	3.00 0.00 0.00 0.00	300.00 T@3	900.00
68884 6/16/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
68887 6/17/2014 WIP Reviewed documents from batch	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
SONY_EN_0001.					
69602 6/18/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
69605 6/19/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69606 6/20/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.00 0.00 0.00 0.00	300.00 T@3	1200.00
69607 6/21/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	2.00 0.00 0.00 0.00	300.00 T@3	600.00
69608 6/23/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	0.50 0.00 0.00 0.00	300.00 T@3	150.00
69609 6/24/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69659 6/25/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69662 6/26/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.50 0.00 0.00 0.00	300.00 T@3	1950.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
69663 6/30/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69664 7/1/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00
69785 7/2/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
69788 7/3/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
69789 7/6/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	2.00 0.00 0.00 0.00	300.00 T@3	600.00
69790 7/7/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69792 7/8/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
69970 7/9/2014 WIP Reviewed documents from batch SONY_EN_0001.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
69974 7/10/2014 WIP Reviewed documents from batch	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.50 0.00 0.00 0.00	300.00 T@3	2250.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
SONY_EN_0001.					
69975	TIME	R. Perez	6.00	300.00	1800.00
7/11/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
69978	TIME	R. Perez	7.50	300.00	2250.00
7/14/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
69980	TIME	R. Perez	7.50	300.00	2250.00
7/15/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70204	TIME	R. Perez	7.00	300.00	2100.00
7/17/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70207	TIME	R. Perez	5.50	300.00	1650.00
7/18/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70210	TIME	R. Perez	1.00	300.00	300.00
7/20/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70212	TIME	R. Perez	8.00	300.00	2400.00
7/21/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70213	TIME	R. Perez	8.00	300.00	2400.00
7/22/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70296	TIME	R. Perez	7.50	300.00	2250.00
7/23/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70299	TIME	R. Perez	7.00	300.00	2100.00
7/24/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
70302	TIME	R. Perez	7.00	300.00	2100.00
7/25/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70303	TIME	R. Perez	7.00	300.00	2100.00
7/26/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70824	TIME	R. Perez	2.00	300.00	600.00
7/29/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70658	TIME	R. Perez	6.30	300.00	1890.00
7/30/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70661	TIME	R. Perez	6.70	300.00	2010.00
7/31/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70663	TIME	R. Perez	6.00	300.00	1800.00
8/1/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70665	TIME	R. Perez	5.50	300.00	1650.00
8/4/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70668	TIME	R. Perez	6.50	300.00	1950.00
8/5/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70890	TIME	R. Perez	8.00	300.00	2400.00
8/6/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70892	TIME	R. Perez	8.00	300.00	2400.00
8/7/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
70895	TIME	R. Perez	5.50	300.00	1650.00
8/7/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
70896	TIME	R. Perez	8.50	300.00	2550.00
8/7/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0002.			0.00		
70932	TIME	R. Perez	4.40	300.00	1320.00
8/13/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
70935	TIME	R. Perez	7.80	300.00	2340.00
8/14/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
70937	TIME	R. Perez	7.00	300.00	2100.00
8/15/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
70940	TIME	R. Perez	7.00	300.00	2100.00
8/18/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71039	TIME	R. Perez	4.00	300.00	1200.00
8/19/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71043	TIME	R. Perez	7.50	300.00	2250.00
8/20/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71044	TIME	R. Perez	7.10	300.00	2130.00
8/21/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71046	TIME	R. Perez	5.00	300.00	1500.00
8/22/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
71047	TIME	R. Perez	4.00	300.00	1200.00
8/25/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71050	TIME	R. Perez	3.50	300.00	1050.00
8/25/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71176	TIME	R. Perez	2.00	300.00	600.00
8/28/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
71879	TIME	K. Scanlan	0.50	575.00	287.50
9/22/2014		(11) Lit Strat	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Review correspondence from lead counsel regarding additional information required of class representative (.30). Communication with client Richard Johns regarding same (.20).			0.00		
71880	TIME	K. Scanlan	0.30	575.00	172.50
9/29/2014		(3) Dt Dsco A/R	0.00	T	
WIP		Li-Ion Batterie	0.00		
Coordinate with client Richard Johns regarding declaration on preservation (.20). Provide same to lead counsel (.10).			0.00		
71897	TIME	R. Perez	5.15	300.00	1545.00
9/30/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72035	TIME	R. Perez	7.50	300.00	2250.00
10/1/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72036	TIME	R. Perez	8.00	300.00	2400.00
10/2/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72037	TIME	R. Perez	4.00	300.00	1200.00
10/3/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
72038	TIME	R. Perez	4.00	300.00	1200.00
10/5/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72039	TIME	R. Perez	5.90	300.00	1770.00
10/6/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72041	TIME	R. Perez	7.50	300.00	2250.00
10/7/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72441	TIME	R. Perez	7.80	300.00	2340.00
10/8/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72442	TIME	R. Perez	7.00	300.00	2100.00
10/9/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0015.			0.00		
72443	TIME	R. Perez	4.00	300.00	1200.00
10/10/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72623	TIME	R. Perez	7.80	300.00	2340.00
10/27/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72624	TIME	R. Perez	7.80	300.00	2340.00
10/28/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72976	TIME	R. Perez	7.00	300.00	2100.00
10/29/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72977	TIME	R. Perez	6.80	300.00	2040.00
10/30/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
72978	TIME	R. Perez	3.50	300.00	1050.00
10/31/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72980	TIME	R. Perez	4.00	300.00	1200.00
11/1/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72981	TIME	R. Perez	8.00	300.00	2400.00
11/3/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
72982	TIME	R. Perez	7.50	300.00	2250.00
11/4/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73164	TIME	R. Perez	7.80	300.00	2340.00
11/5/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73165	TIME	R. Perez	4.50	300.00	1350.00
11/6/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73168	TIME	R. Perez	7.50	300.00	2250.00
11/7/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73170	TIME	R. Perez	7.90	300.00	2370.00
11/10/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73171	TIME	R. Perez	8.00	300.00	2400.00
11/11/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73634	TIME	R. Perez	6.00	300.00	1800.00
11/12/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
73635	TIME	R. Perez	7.50	300.00	2250.00
11/13/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73636	TIME	R. Perez	6.80	300.00	2040.00
11/14/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73637	TIME	R. Perez	2.20	300.00	660.00
11/16/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73639	TIME	R. Perez	7.10	300.00	2130.00
11/17/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73641	TIME	R. Perez	6.90	300.00	2070.00
11/18/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0016.			0.00		
73517	TIME	R. Perez	2.00	300.00	600.00
11/19/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73518	TIME	R. Perez	8.80	300.00	2640.00
11/20/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73521	TIME	R. Perez	8.10	300.00	2430.00
11/21/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73522	TIME	R. Perez	4.00	300.00	1200.00
11/23/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73523	TIME	R. Perez	8.00	300.00	2400.00
11/24/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
73531	TIME	R. Perez	4.00	300.00	1200.00
11/29/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.			0.00		
73535	TIME	R. Perez	7.20	300.00	2160.00
12/1/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73537	TIME	R. Perez	9.20	300.00	2760.00
12/2/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73644	TIME	R. Perez	9.30	300.00	2790.00
12/3/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73646	TIME	R. Perez	7.30	300.00	2190.00
12/4/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73648	TIME	R. Perez	5.00	300.00	1500.00
12/5/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73651	TIME	R. Perez	4.00	300.00	1200.00
12/6/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73653	TIME	R. Perez	9.00	300.00	2700.00
12/8/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73654	TIME	R. Perez	0.80	300.00	240.00
12/9/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		
73894	TIME	R. Perez	7.70	300.00	2310.00
12/10/2014		(7) Doc Review	0.00	T@3	
WIP		Li-Ion Batterie	0.00		
Reviewed documents from batch SONY_EN_0027.			0.00		

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
73896 12/11/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.50 0.00 0.00 0.00	300.00 T@3	1950.00
73897 12/12/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.20 0.00 0.00 0.00	300.00 T@3	2460.00
73903 12/15/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	3.50 0.00 0.00 0.00	300.00 T@3	1050.00
73905 12/16/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	5.00 0.00 0.00 0.00	300.00 T@3	1500.00
73909 12/17/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.90 0.00 0.00 0.00	300.00 T@3	2070.00
73911 12/18/2014 WIP Reviewed documents from batch SONY_EN_0027.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.80 0.00 0.00 0.00	300.00 T@3	2640.00
74006 12/19/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.00 0.00 0.00 0.00	300.00 T@3	2400.00
74008 12/20/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	2.00 0.00 0.00 0.00	300.00 T@3	600.00
74009 12/22/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	5.50 0.00 0.00 0.00	300.00 T@3	1650.00
74016 12/24/2014 WIP Reviewed documents from batch Toshiba-Toshiba	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.60 0.00 0.00 0.00	300.00 T@3	1380.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
America-TOS_0010.					
74060 12/29/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.10 0.00 0.00 0.00	300.00 T@3	2130.00
74062 12/30/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	8.50 0.00 0.00 0.00	300.00 T@3	2550.00
74064 12/31/2014 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
74067 1/2/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.30 0.00 0.00 0.00	300.00 T@3	2190.00
74069 1/5/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
74230 1/7/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	4.50 0.00 0.00 0.00	300.00 T@3	1350.00
74232 1/8/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
74237 1/9/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	5.50 0.00 0.00 0.00	300.00 T@3	1650.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
74238 1/11/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	1.50 0.00 0.00 0.00	300.00 T@3	450.00
74239 1/12/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.00 0.00 0.00 0.00	300.00 T@3	2100.00
74240 1/13/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.00 0.00 0.00 0.00	300.00 T@3	1800.00
74830 1/14/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.20 0.00 0.00 0.00	300.00 T@3	2160.00
74835 1/15/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	6.30 0.00 0.00 0.00	300.00 T@3	1890.00
74836 1/16/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.70 0.00 0.00 0.00	300.00 T@3	2310.00
74824 1/17/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.00 0.00 0.00 0.00	300.00 T@3	2100.00
74953 1/21/2015 WIP Reviewed documents from batch Toshiba-Toshiba America-TOS_0010.	TIME	R. Perez (7) Doc Review Li-Ion Batterie	7.90 0.00 0.00 0.00	300.00 T@3	2370.00
74958 1/22/2015 WIP Reviewed documents from batch Toshiba-Toshiba	TIME	R. Perez (7) Doc Review Li-Ion Batterie	5.80 0.00 0.00 0.00	300.00 T@3	1740.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
America-TOS_0010.					
78000 5/4/2015 WIP [redacted]	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
78021 5/7/2015 WIP [redacted] e-mail with co-counsel regarding same (.10).	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
77533 5/10/2015 WIP Finalize [redacted] interrogatory responses.	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.50 0.00 0.00 0.00	600.00 T	300.00
77669 5/19/2015 WIP E-mail with co-counsel regarding verifications for [redacted]	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.10 0.00 0.00 0.00	600.00 T	60.00
77672 5/20/2015 WIP [redacted]	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.10 0.00 0.00 0.00	600.00 T	60.00
80259 9/15/2015 WIP Telephone call with class counsel regarding Toshiba discovery (.10); [redacted] (.10).	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
83762 12/29/2015 WIP [redacted]	TIME	K. Scanlan (5) Depo Defend Li-Ion Batterie	0.50 0.00 0.00 0.00	600.00 T	300.00
83291 1/4/2016 WIP E-mails regarding [redacted]	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
83339 1/7/2016 WIP E-mails with K. Houk regarding [redacted] to Interrogatory set two.	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
83215 1/11/2016 WIP [redacted] regarding upcoming deposition and preparation.	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.10 0.00 0.00 0.00	600.00 T	60.00
83222 1/12/2016 WIP Telephone call with K. Houk regarding deposition of [redacted]	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.10 0.00 0.00 0.00	600.00 T	60.00
83228 1/13/2016 WIP E-mails with K. Houk and client [redacted] regarding deposition.	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
83179 1/19/2016 WIP Prepare for deposition of [redacted]	TIME	K. Scanlan (5) Depo Defend Li-Ion Batterie	2.00 0.00 0.00 0.00	600.00 T	1200.00
83192 1/20/2016 WIP E-mails with Kathryn Houk regarding preparation for [redacted]	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.50 0.00 0.00 0.00	600.00 T	300.00
83193 1/20/2016 WIP Prepare for deposition of [redacted]	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	3.00 0.00 0.00 0.00	600.00 T	1800.00
83196 1/21/2016 WIP Prepare for deposition of [redacted]	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	5.00 0.00 0.00 0.00	600.00 T	3000.00
83198 1/21/2016 WIP Conference call preparation [redacted] and Lindsey Godfrey Eccles.	TIME	K. Scanlan (5) Depo Defend Li-Ion Batterie	1.00 0.00 0.00 0.00	600.00 T	600.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
83204 1/22/2016 WIP Attend deposition of [redacted]	TIME	K. Scanlan (5) Depo Defend Li-Ion Batterie	8.00 0.00 0.00 0.00	600.00 T	4800.00
83205 1/22/2016 WIP E-mail to L. Godrey-Eccles regarding outstanding issues from deposition.	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.50 0.00 0.00 0.00	600.00 T	300.00
84182 1/25/2016 WIP [redacted]	TIME	K. Scanlan (3) Dt Dsco A/R Li-Ion Batterie	0.40 0.00 0.00 0.00	600.00 T	240.00
85166 2/4/2016 WIP E-mails regarding deposition transcripts.	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
85189 2/9/2016 WIP E-mails regarding transcript and supplemental Interrogatory responses for [redacted]	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
84121 2/18/2016 WIP E-mails regarding signature of [redacted] for deposition transcript.	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
85119 3/14/2016 WIP Review supplemental discovery responses (.30); e-mails with lead counsel regarding verifications (.10).	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	0.40 0.00 0.00 0.00	600.00 T	240.00
85284 3/21/2016 WIP [redacted]	TIME	K. Scanlan (12) Negot Sett Li-Ion Batterie	0.30 0.00 0.00 0.00	600.00 T	180.00
85304 3/21/2016 WIP E-mails to lead counsel regarding request to	TIME	K. Scanlan (11) Lit Strat Li-Ion Batterie	0.30 0.00 0.00 0.00	600.00 T	180.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time / Est. Time / Variance	Rate / Rate Info / Bill Status	Slip Value
search for electronic documents.					
85330 3/23/2016 WIP Review letter from lead counsel regarding dismissal (.10); [redacted]	TIME	K. Scanlan (9) Read/Rev Li-Ion Batterie	0.20 0.00 0.00 0.00	600.00 T	120.00
Grand Total					
		Billable	942.30		290350.00
		Unbillable	0.00		0.00
		Total	942.30		290350.00

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
KELLER GROVER LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	$445.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	$2090.85
Investigation	
Lexis/Westlaw	$43.20
Messenger/Delivery	$44.90
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	$69.00
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	$34.00
TOTAL:	**$2,726.95**

EXHIBIT 33

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF MARK A. GRIFFIN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KELLER ROHRBACK L.L.P.**

I, Mark A. Griffin, declare:

1. I am a partner of Keller Rohrback L.L.P., Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to [insert named class representative's name, if applicable] and as counsel for IPPs throughout the course of this litigation. The background and experience of Keller Rohrback L.L.P. and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Keller Rohrback L.L.P. has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While [insert firm name] devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Keller Rohrback L.L.P. performed the following work: Investigated and filed a complaint and coordinated this filing with lead counsel, responding to inquiries about discovery and expert issues.

5. Attached hereto as **Exhibit B** is a billing summary of Keller Rohrback L.L.P.'s total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Keller Rohrback L.L.P. during this period of time was 32, with a corresponding lodestar based on current rates of $25,593.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared Keller Rohrback L.L.P.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Keller Rohrback L.L.P. has incurred during the course of this litigation. Keller Rohrback L.L.P. expended a total of $1,761.65 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Keller Rohrback L.L.P. on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Keller Rohrback L.L.P. in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23rd, 2017at Seattle, Washington.

/s/ Mark A. Griffin

Mark A. Griffin

ATTESTATION

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

By: */s/ Steven N. Williams*
Steven N. Williams

4823-2598-7401, v. 1

EXHIBIT A

KELLER
ROHRBACK
LAW OFFICES ◆ L.L.P.

COMPLEX
LITIGATION

SEATTLE OAKLAND NEW YORK PHOENIX SANTA BARBARA RONAN
800-776-6044 | info@kellerrohrback.com | www.krcomplexlit.com

ABOUT KELLER ROHRBACK

Devoted to Justice

"[Keller Rohrback] has performed an important public service in this action and has done so efficiently and with integrity…[Keller Rohrback] has also worked creatively and diligently to obtain a settlement from WorldCom in the context of complex and difficult legal questions…"
In re WorldCom, Inc. ERISA Litigation (Cote, J.).



Keller Rohrback's lawyers excel by being prepared and persuasive. It's a simple formula that combines our strengths: outstanding writing and courtroom skill, together with unparalleled passion and integrity. We have recovered billions of dollars for our clients, and have served as lead counsel in many prominent cases, including numerous financial crisis cases against Wall Street banks and mortgage originators. Our lawyers are widely recognized as leaders in their fields who have dedicated their careers to combating corporate fraud and misconduct. We have the talent as well as the financial resources to litigate against Fortune 500 companies – and do so every day.



Who We Are

Keller Rohrback's Complex Litigation Group has a national reputation as the go-to plaintiffs' firm for large-scale, complex individual and class action cases. We represent public and private investors, businesses, governments, and individuals in a wide range of actions, including securities fraud, fiduciary breach, antitrust, whistleblower, environmental, and product liability cases. Our approach is straightforward—we represent clients who have been harmed by conduct that is wrong, and we litigate with passion and integrity to obtain the best results possible. Every case is different, but we win for the same reason: we are persuasive. When you hire us, you hire smart, creative lawyers who are skilled in court and in negotiations.

Founded in 1919, Keller Rohrback's sixty-nine attorneys and over 100 staff members are based in six offices across the country in Seattle, Oakland, Santa Barbara, Phoenix, New York, and Ronan. Over the past century, our firm has built a distinguished reputation by providing top-notch representation. We offer exceptional service and a comprehensive understanding of federal and state law nationwide. We also are well known for our abilities to collaborate with co-counsel and to work together to achieve outstanding results—essential skills in large-scale cases in which several firms represent the plaintiffs. We pride ourselves on our reputation for working smartly with opposing counsel, and we are comfortable and experienced in coordinating high-stakes cases with simultaneous state and federal government investigations. Keller Rohrback attorneys earn the respect of our colleagues and our opponents through our deft handling of the array of complex issues and obstacles our clients face.

ABOUT KELLER ROHRBACK

What We Do

Keller Rohrback's Complex Litigation Group represents plaintiffs in large-scale cases involving corporate wrongdoing. We litigate against companies that pollute, commit fraud, fix prices, and take advantage of consumers, employees, and investors. We are passionate advocates for justice. In addition, the Complex Litigation Group regularly calls on attorneys in the firm's other practice areas for expertise in areas such as bankruptcy, constitutional law, corporate transactions, financial institutions, insurance coverage, and intellectual property. Our group's access to these in-house resources distinguishes Keller Rohrback from other plaintiffs' class action firms and contributes to the firm's success. We also have a history of working with legal counsel from other countries to vigorously pursue legal remedies on behalf of clients around the globe.

We have won verdicts in state and federal courts throughout the nation and have obtained judgments and settlements on behalf of clients in excess of seven billion dollars. Courts around the country have praised our work, and we are regularly appointed lead counsel in nationally prominent class action cases. Our work has had far-reaching impacts for our clients in a variety of settings and industries, creating a better, more accountable society.

Who We Serve

We represent individuals, institutions, and government agencies. The common denominators of our clients is a desire to see justice done—and to be represented by attorneys who practice law with integrity, honesty, and devotion to serving our clients' interests.



"Despite substantial obstacles to recovery, Keller Rohrback was willing to undertake the significant risks presented by this case…Class Counsel achieved real and substantial benefits for members of the Class. [Their] extensive prior experience in complex class action securities litigation… enabled the Class to analyze and achieve this excellent result." Getty v. Harmon (SunAmerica Securities Litigation) (Dwyer, J.).

ANTITRUST AND TRADE REGULATION

KR

ATTORNEYS

Lynn Lincoln Sarko
Raymond Farrow
Mark Griffin
Amy N.L. Hanson
Cari Campen Laufenberg
Elizabeth A. Leland
Tana Lin
Ryan McDevitt
Karin Swope

Keller Rohrback's antitrust and trade regulation practice represents Plaintiffs in state and federal courts to ensure that consumers get the benefits of free and fair competition in the marketplace. Keller Rohrback has successfully litigated cases on behalf of both consumers and businesses who have been harmed by illegal anti-competitive conduct, such as price fixing, price discrimination, misleading and deceptive marketing practices, and the monopolization and attempted monopolization of markets.

For decades, Keller Rohrback has served as lead counsel, on MDL executive committees, and in other prominent roles in large price-fixing and price discrimination cases.

REPRESENTATIVE CASES

Nurse Wage Litigation: Fleischman v. Albany Medical Center; Cason-Merenda v. Detroit Medical Center (N.D.N.Y.); (E.D. Mich.)

Keller Rohrback was Co-Lead Counsel in these long-running antitrust actions which recovered $105 million in underpaid wages resulting from an alleged conspiracy among hospitals to set the compensation of their nurse employees in Albany, New York, and Detroit, Michigan.

Ferko v. National Ass'n For Stock Car Auto Racing, Inc., No. 02-50 (E.D. Tex.)

Keller Rohrback was Counsel for Plaintiff, a shareholder in Texas Motor Speedway (TMS), in a lawsuit that charged NASCAR with breach of contract, unlawful monopolization, and conspiring with International Speedway Corporation (ISC) to restrain trade in violation of the antitrust laws. The settlement agreement allowed TMS to purchase North Carolina Speedway from ISC and required NASCAR to sanction a Nextel Cup Series race at TMS in the future, relief that was valued at $100.4 million.

In re Vitamins Antitrust Litigation, MDL No. 1285 (D.D.C.)

Keller Rohrback played a significant role in litigating this MDL case, one of the largest and most successful antitrust cases in history. Chief Judge Thomas Hogan certified two classes of businesses who directly purchased bulk vitamins and were overcharged as a result of a ten-year global price-fixing and market-allocation conspiracy. Recoveries for the class through settlement and verdict totaled over $1 billion.

In re Online DVD Rental Antitrust Litigation, MDL No. 2029 (N.D. Cal.)

Keller Rohrback represented purchasers of online DVD rental services accusing Wal-Mart and Netflix of engaging in a market allocation scheme. The class achieved settlements of over $30 million.

"The Court has repeatedly stated that the lawyering in the case at every stage was superb, and does again." *In re Linerboard Antitrust Litigation*, MDL No. 1261, 2004 WL 1221350 *6 (E.D. Pa. June, 2 2004) (DuBois, J.).

ANTITRUST AND TRADE REGULATION

REPRESENTATIVE CASES continued

Johnson v. Arizona Hospital and Healthcare Association, No. 07-1292 (D. Ariz.)

Keller Rohrback represented agency nurses who worked at various Arizona hospitals seeking to recover the underpayment of wages resulting from a conspiracy to suppress the cost of agency nurses. The class achieved settlements of more than $26 million.

Molecular Diagnostics v. Hoffman-La Roche, Inc., No. 04-1649 (D.D.C.)

Keller Rohrback served on the Executive Committee of this class action lawsuit on behalf of direct purchasers of thermus aquaticus DNA polymerase (Taq), an essential input to technologies used to study DNA. The lawsuit alleged that various Hoffman-La Roche entities, in concert with the Perkins Elmer Corp., fraudulently procured a patent for Taq with the intent and effect of illegally monopolizing the Taq market. The court approved a $33 million settlement in 2008.

Daisy Mountain Fire District v. Microsoft Corp., MDL No. 1332 (D. Md.)

Keller Rohrback obtained a settlement in excess of $4 million on behalf of a class of Arizona governmental entities that indirectly purchased operating systems and software from Microsoft for overcharges resulting from Microsoft's monopolistic practices. The settlement returned millions of dollars to local government entities at a time of severe budget crisis in the state.

Transamerican Refining Corporation v. Dravo Corp., No. 88-789 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed on behalf of all cost-plus purchasers of specialty steel pipe. Fabricators and suppliers of that pipe were sued on allegations of a nationwide price fixing conspiracy. The class, comprised mainly of owners of electric generating plants and oil refineries, achieved a settlement of more than $49 million.

In approving a settlement, Judge Alan McDonald stated, "[T]he Court is impressed by the manner in which the issues have been addressed, the action has been initiated and resolved; and that is, of course, an accolade to the attorneys on both sides of the issue. And, of course, that is the underlying basis for the Court's approval. No one has more respect for the art of settlement than the incumbent of this bench. It is the most difficult of all undertakings by trial lawyers, and settlement always recognizes their composite judgment, oftentimes of nuances which are impossible to articulate. So given the caliber of the attorneys involved on both sides of this matter, the Court is satisfied that if it is good enough for them, it should be good enough for the Court." *In re Soft Drink Bottling Antitrust Litigation* (E.D. Wash. 1990).

APPELLATE PRACTICE

ATTORNEYS

Lynn Lincoln Sarko
T. David Copley
Ben Gould
Ron Kilgard
Cari Campen Laufenberg
Jeffrey Lewis
Derek Loeser
Gretchen Obrist
Erin Riley
Matthew Preusch
Karin Swope

Appeals require specialized skills and experience, and Keller Rohrback has a seasoned appellate team that includes award-winning brief writers and outstanding oral advocates. Our appellate expertise is particularly important in large cases, including complex class actions. Keller Rohrback has the experience and talent to handle any issue that arises involving interlocutory appeals and will work to ensure that any judgment or settlement is affirmed on appeal.

REPRESENTATIVE CASES

Clarke v. Baptist Memorial Healthcare Corp., --F. App'x -- (6th Cir. 2016)

Keller Rohrback overturned the district court's denial of intervention, thus allowing our clients to challenge an earlier denial of class certification.

Baker v. Microsoft Corp., 797 F.3d 607 (9th Cir. 2015)

In this proposed class action arising from a defect in Microsoft's Xbox 360, Keller Rohrback persuaded the Ninth Circuit that the trial court had erred by striking the class allegations from the complaint.

Alcantara v. Bakery & Confectionary Union, 751 F.3d 71 (2d Cir. 2014)

Keller Rohrback successfully defended the trial court's decision and judgment that the Defendants had unlawfully reduced pension benefits.

Gates v. UnitedHealth Group Inc., 561 F. App'x 73 (2d Cir. 2014)

Keller Rohrback persuaded the Second Circuit to reverse the district court's dismissal of our client's claims for medical coverage.

Wurtz v. Rawlings Co., 761 F.3d 232 (2d Cir. 2014)

Keller Rohrback submitted an amicus brief on behalf of the New York State Trial Lawyers Association in support of the appellants. The Second Circuit cited the amicus brief and adopted much of its reasoning in reversing the trial court.

Heckman v. Williamson County, 369 S.W.3d 137 (Tex. 2012)

Keller Rohrback represented a proposed class of indigent criminal Defendants who challenged the constitutionality of a number of pretrial procedures. Keller Rohrback persuaded the Texas Supreme Court to reverse the Texas Court of Appeals and allow the Plaintiffs to proceed with their claims.

Braden v. Wal-Mart Stores, Inc., 588 F.3d 585 (8th Cir. 2009)

Keller Rohrback represented a class of Wal-Mart employees who alleged that Wal-Mart's 401(k) plan charged them excessive fees. Keller Rohrback convinced the Eighth Circuit to reverse the trial court and reinstate the employees' claims.

In re Syncor ERISA Litigation, 516 F.3d 1095 (9th Cir. 2008)

Keller Rohrback represented a group of workers who alleged that their employer had violated the law by investing their retirement savings in the employer's stock. Keller Rohrback convinced the Ninth Circuit to reverse the dismissal of the trial court and reinstate the workers' claims.

BANKRUPTCY-RELATED LITIGATION

ATTORNEYS

Laurie Ashton
Gary A. Gotto
Christopher Graver

Keller Rohrback attorneys have deep and broad experience litigating in the bankruptcy courts on behalf of debtors, creditors, and creditor committees, as well as on behalf of Plaintiffs whose claims were interrupted by bankruptcy petitions. Our experience includes representing class claimants in numerous large-scale bankruptcies. These representations have involved virtually all areas of sophisticated bankruptcy practice, including: (i) pursuing relief from an automatic to litigate claims in district court; (ii) filing and opposing orders to withdraw the reference to the bankruptcy court; (iii) certifying a claimant class in bankruptcy; (iv) asserting rights to officer, director, or fiduciary insurance policies between conflicting bankruptcy claimants; (v) evaluating and negotiating proposals for debtor financing, cash collateral orders, estate sale orders and other bankruptcy administrative matters; (vi) defending against subordination claims, and; (vii) negotiating acceptable terms of a plan of reorganization with the debtors' committee, creditors' committees, and other constituencies.

Keller Rohrback's bankruptcy attorneys also have extensive experience in a wide variety of matters involving corporate restructuring and commercial bankruptcies. Our bankruptcy clients range from tort claimants to operating entities to institutional lenders. Examples include representation of the official committee of victims of clergy sexual abuse in the Chapter 11 reorganization of a Catholic diocese, the debtors in a reorganization of fifty commercial real properties across the nation; and a national services company in the acquisition of a competitor's assets in a bankruptcy court-approved sale in the Northern District of California.

In addition to the representative cases listed below, Keller Rohrback has achieved similar results in numerous other bankruptcy proceedings involving corporations such as Global Crossing Ltd., Mirant Corp., Delphi Corp., and Fremont General Corp.

REPRESENTATIVE CASES

In re Enron Corp., No. 01-16034 (Bankr. S.D.N.Y.)

Keller Rohrback obtained stay relief to pursue litigation in the Southern District of Texas and defended against a motion to subordinate claims. Keller Rohrback achieved a settlement for the class that included the allowance of a $265 million claim in the Enron bankruptcy.

In re WorldCom, Inc., Nos. 02 Civ. 3288(DLC), 02 Civ. 8981(DLC) (Bankr. S.D.N.Y.)

Keller Rohrback defended against a motion to subordinate claims and successfully negotiated a simultaneous resolution of claims in the bankruptcy and district courts against third parties in the total amount of $48 million.

In re Nortel Networks, Inc., No. 09-10138(KG) (Bankr. D. Del.)

Keller Rohrback represented class claimants in simultaneous insolvency proceedings in Canada under the Companies' Creditors Arrangement Act and bankruptcy court in the District of Delaware. Keller Rohrback obtained stay relief to pursue litigation in the Middle District of Tennessee and ultimately settled class claims in Tennessee for over $21 million.

In re Washington Mutual, Inc., No. 08-12229(MFW) (Bankr. D. Del.)

Keller Rohrback sought stay relief to pursue litigation in the Western District of Washington and pursued claims in bankruptcy court in Delaware, resulting in a simultaneous resolution of claims in the bankruptcy and district courts for $20 million.

CONSUMER PROTECTION CLASS ACTIONS KR

ATTORNEYS

Lynn Lincoln Sarko
Gretchen Freeman Cappio
T. David Copley
Raymond Farrow
Eric Fierro
Laura Gerber
Mark Griffin
Amy N.L. Hanson
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David Ko
Cari Campen Laufenberg
Elizabeth A. Leland
Tana Lin
Ryan McDevitt
Michael Meredith
Lisa A. Nowlin
Gretchen Obrist
Lisa Faye Petak
Mark D. Samson
Karin B. Swope
Havila C. Unrein
Amy Williams-Derry
Michael Woerner



For decades, consumers have trusted the attorneys of Keller Rohrback to protect them from harmful and unfair trade practices. Our firm is a leader in representing consumers in class action lawsuits in diverse areas, including vehicles, children's products, food contamination, drugs, mortgage modifications, identity theft, and data breaches. Keller Rohrback currently represents a wide range of consumers, such as vehicle owners and lessees, parents, environmentalists, fishermen, employees, professors, doctors, and nurses.

Through decades of hard work, ingenuity, and creativity, Keller Rohrback has achieved meaningful results for decades. These results impact not just our clients, but future consumers too; for example, homeowners now benefit from improved loan-modification practices at one of the country's biggest banks as a result of our advocacy.

Keller Rohrback attorneys are frequently featured speakers and presenters at prestigious legal education seminars on class actions, consumer protection, and data privacy.

REPRESENTATIVE CASES

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation, MDL No. 2672 (N.D. Cal.)

Keller Rohrback filed the first multi-Plaintiff complaint against Volkswagen on September 20, 2015, two days after the defeat device scheme came to light. Our clients are consumers nationwide who allege they have been damaged by Volkswagen's fraudulent use of an emissions "defeat device" in over 500,000 vehicles in the United States and over eleven million worldwide. Keller Rohrback Managing Partner Lynn Sarko serves on the Plaintiffs' Steering Committee for this national litigation.

In re JPMorgan Chase Mortgage Modification Litigation, MDL No. 2290 (D. Mass.)

Keller Rohrback served as Co-Lead Counsel in this MDL, representing homeowners who attempted to obtain mortgage loan modifications from JPMorgan Chase and related entities. Plaintiffs alleged breach of contract and violations of consumer protection laws when Defendants failed to timely evaluate or approve mortgage modification applications of homeowners who had completed identified prerequisities. Keller Rohrback achieved a settlement for the class valued at over $500 million.

In re Bisphenol-A (BPA) Polycarbonate Plastic Products Liability Litigation, MDL No. 08-1967 (W.D. Mo.)

Keller Rohrback served on the Plaintiffs' Steering Committee in this MDL on behalf of purchasers of plastic baby bottles and "sippy" cups which contained the chemical bisphenol-A (BPA). The action was favorably settled.

REPRESENTATIVE CASES continued

In re Mattel, Inc., Toy Lead Paint Products Liability Litigation, MDL No. 1897 (C.D. Cal.)

Keller Rohrback served as Chair of the Executive Committee in this nationwide MDL against Mattel and Fisher-Price on behalf of purchasers of toys recalled because they were manufactured using lead paint and/or dangerous magnets. On behalf of Plaintiffs, Keller Rohrback achieved a settlement valued at approximately $50 million.

Brotherson v. Professional Basketball Club, L.L.C., No. 07-1787 (W.D. Wash.)

Keller Rohrback represented Seattle Sonics season ticket holders who renewed their 2007–2008 season ticket packages before the team was relocated to Oklahoma City. After Plaintiffs prevailed on summary judgment, the parties negotiated a significant settlement that returned substantial sums to the class.

In re Checking Account Overdraft Litigation, No. 09-2036 (S.D. Fla.)

Keller Rohrback serves as Co-Executive Lead Counsel with regard to Defendant, Key Bank, representing consumers who allege that KeyBank violated state law by changing the order of debit card transactions to increase overdraft fees charged to customers, resulting in unlawful profits to the bank in the tens of millions of dollars. The matter is on appeal to the Eleventh Circuit.

Telephone Consumer Protection Act Cases, (King Cnty. Super. Ct., Wash.)

Keller Rohrback prosecuted numerous class actions concerning the sending of unsolicited facsimiles in violation of the Washington Telephone Consumer Protection Act, resulting in the issuance of eleven permanent injunctions and the recovery of over $56 million on behalf of injured Plaintiffs.

Ormond v. Anthem, Inc., No. 05-1908 (S.D. Ind.)

Anthem Insurance converted from a mutual company to a stock company on November 2, 2001. More than 700,000 former members of the mutual company sued Anthem, alleging that the cash compensation they received as a result of the demutualization was inadequate. After class certification and shortly before the start of trial, Keller Rohrback and co-counsel settled the action for $90 million.

Corona v. Sony Pictures Entertainment, Inc., No. 14-9600 (C.D. Cal.)

Keller Rohrback serves as interim Co-Lead Counsel and Liaison Counsel in this case against Sony Pictures Entertainment, Inc. on behalf of former and current Sony employees affected by the company's highly publicized data breach. Plaintiffs alleged that Sony failed to secure and protect its computer systems, servers, and databases, resulting in the release of the named Plaintiffs and other class members' personal information. Keller Rohrback obtained a significant settlement for the class in October 2015, which was approved in April 2016.

Iacovelli v. SBTickets.com, LLC, No. 15-1459 (Maricopa Cnty. Super. Ct., Ariz.)

Keller Rohrback filed a class action in Arizona state court on behalf of individuals who paid for, but did not receive, tickets to the 2014 Super Bowl (Super Bowl XLIX) from the ticket broker SBTickets. Despite purchasing tickets and receiving numerous representations that their tickets were guaranteed, SBTickets customers were told just days before the game, and in some instances, only hours before kickoff, that their ticket orders would not be fulfilled. The case was settled on favorable terms for the class notwithstanding the Defendant's insolvency and bankruptcy proceedings.

EMPLOYEE BENEFITS

ATTORNEYS

Lynn Lincoln Sarko
Laurie Ashton
Gretchen Freeman Cappio
T. David Copley
Alison Gaffney
Laura Gerber
Matthew Gerend
Gary Gotto
Benjamin Gould
Amy N. L. Hanson
Khesraw (Kash) Karmand
Dean N. Kawamoto
Ron Kilgard
David Ko
Tanya Korkhov
Cari Campen Laufenberg
Elizabeth A. Leland
Jeffrey Lewis
Derek Loeser
Ian Mensher
Gretchen Obrist
David Preminger
Erin Riley
Karin B. Swope
Havila C. Unrein
Amy Williams-Derry

Keller Rohrback is the preeminent firm for Employee Retirement Income Security Act of 1974 (ERISA) and other benefit class action litigation. Our firm is a pioneer of ERISA class action litigation, with over a billion dollars of pension and health benefits recovered for our clients. Keller Rohrback has played a major role in developing the law and establishing that ERISA's strict fiduciary duties apply to all investments in company-sponsored retirement plans, as well as to benefits in health and welfare plans.

Keller Rohrback is routinely appointed lead or co-lead counsel in major employee benefit class actions. Our work in this complex and rapidly developing area has been praised by our clients, our co-counsel, and federal courts. Managing a complex, large-scale employee benefit case requires knowledge of employee benefit, securities, accounting, corporate, bankruptcy, and class action law. Keller Rohrback has excelled in these cases by developing a deep understanding of ERISA and by drawing on our expertise in numerous related practice areas.

Keller Rohrback attorneys are frequently featured speakers and presenters at prestigious legal education seminars on employee benefit class actions and ERISA.

REPRESENTATIVE CASES

Whetman v. IKON Office Solutions, Inc., MDL No. 1318 (E.D. Pa.)

The wave of 401(k) company stock cases began with *Whetman v. IKON Office Solutions, Inc*. In a first-of-its-kind complaint, we alleged that company stock was an imprudent investment for IKON's 401(k) plan, that the fiduciaries of the plan failed to provide complete and accurate information concerning company stock to the participants, and that they failed to address their conflicts of interest. This case resulted in ground-breaking opinions in the ERISA 401(k) area of law on motions to dismiss, class certification, approval of securities settlements with a carve-out for ERISA claims, and approval of ERISA settlements providing a total recovery to the Plans of $111 million. Judge Katz granted final approval of the settlement on August 9, 2002.

In re Enron Corp. ERISA Litigation, MDL No. 1446 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of Texas. After groundbreaking motions to dismiss decisions and several years of discovery, Keller Rohrback negotiated four separate settlements with different groups of Defendants, resulting in recoveries of over $264 million for the class. Judge Melinda Harmon approved the fifth and final settlement on February 23, 2007.

EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued

In re Lucent Technologies, ERISA Litigation, No. 01-3491 (D.N.J.)

Keller Rohrback served as Co-Lead Counsel in this class action brought on behalf of participants and beneficiaries of the Lucent defined contribution plans who invested in Lucent stock. A settlement providing injunctive relief and the payment of $69 million to the plan was approved by Judge Joel Pisano on December 12, 2003.

In re WorldCom, Inc. ERISA Litigation, No. 02-4816 (S.D.N.Y.)

Keller Rohrback served as Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the WorldCom 401(k) Salary Savings Plan who invested in WorldCom stock. Settlements providing for injunctive relief and payments of over $48 million to the plan were approved by Judge Denise Cote on October 26, 2004 and November 21, 2005.

> "[Keller Rohrback] has performed an important public service in this action and has done so efficiently and with integrity...[Keller Rohrback] has also worked creatively and diligently to obtain a settlement from WorldCom in the context of complex and difficult legal questions... [Keller Rohrback] should be appropriately rewarded as an incentive for the further protection of employees and their pension plans not only in this litigation but in all ERISA actions." *In re WorldCom, Inc. ERISA Litigation*, No. 02-4816, 2004 WL 2338151, *10 (S.D.N.Y. Oct. 18, 2004) (Cote, J.).

In re AIG ERISA Litigation, No. 04-9387 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the AIG 401(k) retirement plans who invested in AIG stock. A settlement providing for injunctive relief and the payment of $25 million to the plans was approved by Judge Kevin T. Duffy on October 8, 2008.

In re AIG ERISA Litigation II, No. 08-5722 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the AIG 401(k) retirement plans who invested in AIG stock. A settlement providing for injunctive relief and the payment of $40 million to the plans was approved by Judge Laura Swain on September 18, 2015.

Alvidres v. Countrywide Financial Corp., No. 07-5810 (C.D. Cal.)

Keller Rohrback served as Lead Counsel in this class action filed on behalf of participants and beneficiaries of the Countrywide 401(k) plan who invested in Countrywide stock. A settlement providing for injunctive relief and the payment of $55 million to the plan was approved by Judge John F. Walter on November 16, 2009.

In re CMS Energy ERISA Litigation, No. 02-72834 (E.D. Mich.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Eastern District of Michigan on behalf of participants and beneficiaries of the CMS defined contribution plans who invested in CMS stock. A settlement providing injunctive relief and a payment of $28 million to the plan was approved by Judge George Caram Steeh on December 27, 2004.

EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued

In re Dynegy, Inc. ERISA Litigation, No. 02-3076 (S.D. Tex.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of Texas on behalf of participants and beneficiaries of the Dynegy defined contribution plans who invested in Dynegy stock. A settlement providing injunctive relief and a payment of $30.75 million to the plan was approved by Judge Sim Lake on March 5, 2004.

In re Fremont General Corporation Litigation, No. 07-2693 (C.D. Cal.)

Keller Rohrback served as Lead Counsel in this class action filed in the Central District of California on behalf of participants and beneficiaries of the Freemont 401(k) plan who invested in Fremont stock. A settlement providing injunctive relief and a payment of $21 million to the plan was approved by Judge Jacqueline Nguyen on August 10, 2011.

In re Global Crossing, Ltd. ERISA Litigation, No. 02-7453 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of the GX defined contribution plans who invested in GX stock. A settlement providing injunctive relief and a payment of $79 million to the plan was approved by Judge Gerard Lynch on November 10, 2004.

In re HealthSouth Corp. ERISA Litigation, No. 03-1700 (N.D. Ala.)

Keller Rohrback served as Lead Counsel in this class action filed in the Northern District of Alabama on behalf of participants and beneficiaries of HealthSouth's retirement plans who invested in HealthSouth stock. A settlement providing injunctive relief and a payment of $28.875 million to the plan was approved by Judge Bowdre on June 28, 2006.

In re Household International, Inc. ERISA Litigation, No. 02-7921 (N.D. Ill.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Northern District of Illinois on behalf of participants and beneficiaries of Household's retirement plans who invested in Household stock. A settlement providing injunctive relief and a payment of $46.5 million to the plan was approved by Judge Samuel Der-Yeghiayan on November 22, 2004.

In re Merck & Co., Inc. "ERISA" Litigation, MDL No. 1658 (D.N.J.)

Keller Rohrback served on the Co-Lead Counsel Committee in this class action filed in the District of New Jersey on behalf of participants and beneficiaries of Merck's retirement plans who invested in Merck stock. A settlement providing injunctive relief and a payment of $49.5 million to the plan was approved by Judge Stanley R. Chesler on November 29, 2011.

In re Merrill Lynch & Co., Inc. Securities, Derivative & ERISA Litigation, No. 07-10268 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this class action filed in the Southern District of New York on behalf of participants and beneficiaries of Merrill Lynch's defined contribution plans who invested in Merrill Lynch stock. A settlement providing injunctive relief and a payment of $75 million to the plans was approved by Judge Jed S. Rakoff on August 21, 2009.

In re State Street Bank and Trust Co. ERISA Litigation, No. 07-8488 (S.D.N.Y.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Southern District of New York brought on behalf of participants and beneficiaries in the company's retirement plans. A settlement providing a payment of $89.75 million was approved by Judge Richard J. Holwell on February 19, 2010.

EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued

Overall v. Ascension Health, No. 13-11396 (E.D. Mich.)

Keller Rohrback served as Co-Lead Counsel in this lawsuit that alleged Defendants' claim that the Ascension pension plans are exempt from ERISA's protections because it is a "church plan" is improper because, among other things, Ascension Health is not a church, or a convention or association of churches, and the Ascension Pension Plans were not established by a church or a convention or association of churches. A settlement providing for equitable relief, plus payment of $8 million to the plans was approved by Judge Avern Cohn on April 14, 2015. Keller Rohrback continues to litigate a number of similar cases throughout the country, challenging Defendants' claims that their pension plans are exempt from ERISA.

In re Washington Mutual, Inc. ERISA Litigation, No. 07-1874 (W.D. Wash.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Western District of Washington on behalf of participants and beneficiaries in the company's retirement plans who invested in Washington Mutual stock. On January 7, 2011, Judge Marsha J. Pechman granted final approval of the $49 million settlement in the ERISA action.

In re Williams Companies ERISA Litigation, No. 02-153 (N.D. Okla.)

Keller Rohrback served as Lead Counsel in this ERISA breach of fiduciary duty class action filed in the Northern District of Oklahoma on behalf of participants and beneficiaries in the company's retirement plans who invested in Williams stock. A settlement providing a payment $55 million in cash, plus equitable relief, was approved by Judge Terence C. Kern on November 16, 2005.

In re Xerox Corporation ERISA Litigation, No. 02-1138 (D. Conn.)

Keller Rohrback served as Co-Lead Counsel in this ERISA breach of fiduciary duty class action in the District of Connecticut on behalf of participants and beneficiaries in the company's retirement plans who invested in Xerox stock. A settlement providing for equitable relief plus a payment of $51 million to the plans was approved by Judge Alvin Thompson on April 14, 2009.

> "The Court finds that [Keller Rohrback] is experienced and qualified counsel who is generally able to conduct the litigation as lead counsel on behalf of the putative class. Keller Rohrback has significant experience in ERISA litigation, serving as co-lead counsel in the Enron ERISA litigation, the Lucent ERISA litigation, and the Providian ERISA litigation, and experience in complex class action litigation in other areas of law" *In re Williams Cos. ERISA Litigation*, No. 02-153, 2002 U.S. Dist. LEXIS 27691, *8 (N.D. Okla. Oct. 28, 2002) (Holmes, J.).

EMPLOYEE BENEFITS

REPRESENTATIVE CASES continued



Fish v. Greatbanc Trust Company, No. 09-1668 (N.D. Ill.)

Keller Rohrback represents participants in the Antioch ESOP in this lawsuit filed in the Northern District of Illinois. Plaintiffs allege that Defendants breached their ERISA fiduciary duties by allowing the Antioch Company to redeem the Antioch shares of non-ESOP shareholders for more than they were worth, leaving the Antioch ESOP as the sole shareholder of a company with a greatly reduced value.

Potter v. ConvergEx, No. 13-9150 (S.D.N.Y.)

Keller Rohrback serves as Co-Counsel in this lawsuit filed in the Southern District of New York that alleges Defendants violated ERISA by "double-charging" for transition management and brokerage services. Defendants funneled trade orders to an offshore subsidiary broker located in Bermuda, which created a "spread" between the actual investment price and the reported price by adding markups/markdowns. While the reported price was confirmed with customers, the actual price was undisclosed and constituted unauthorized additional compensation.

Rader v. Bruister, No. 13-1081 (S.D. Miss.)

This case alleges breach of fiduciary duty and prohibited transactions in connection with the purchase by the Bruister Company ESOP of shares from its founder. In 2014, Keller Rohrback obtained a judgment for approximately $6.5 million after a lengthy bench trial. Collection actions are proceeding on the existing judgment. Defendants appealed the judgment. The appeal was fully briefed and argued in 2015.

> "[T]he Court expressly finds that the [Keller Rohrback] attorneys added considerable value to the prosecution of these claims through their briefing, preparation, and courtroom appearances. . . . The [Keller Rohrback] attorneys were skilled and knowledgeable in ESOP litigation . . . ." *Perez v. Bruister*, 2015 WL 5712883, at *4 (S.D. Miss. 2015) (Jordan, J.)

ENVIRONMENTAL LITIGATION

ATTORNEYS

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Alison Chase
Derek Loeser
Daniel Mensher
Matthew Preusch
Amy Williams-Derry
Michael Woerner

Attorneys in Keller Rohrback's Complex Litigation Group have successfully represented individuals, class members, municipalities, and nonprofit organizations in complex and critical environmental litigation. In cases involving oil spills, mishandled hazardous waste, contaminated consumer products, and industrial pollution, Keller Rohrback works to protect human health and the environment. The firm combines its unparalleled experience in consumer protection and its deep knowledge of environmental law, making Keller Rohrback a worldwide leader in litigation to safeguard our environment and the people and animals that rely on it.

REPRESENTATIVE CASES

In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Litigation, No. 3:15-md-02672 (N.D. Cal.)

Keller Rohrback filed the first multi-plaintiff complaint against Volkswagen on September 20, 2015, two days after the defeat device scheme came to light. Our clients are consumers nationwide who allege they have been damaged by Volkswagen's fraudulent use of an emissions "defeat device" in over 500,000 vehicles in the United States and over eleven million worldwide. Keller Rohrback's Lynn Sarko serves on the Plaintiffs' Steering Committee for this national litigation.

In re Exxon Valdez, No. 89-95 (D. Alaska)

Keller Rohrback was trial counsel representing fishermen, landowners, and businesses located in Prince William Sound in their action against Exxon to recover damages caused by the Exxon Valdez oil spill. A federal jury awarded a $5 billion judgment in favor of Keller Rohrback clients. At the time, it was the largest punitive damages verdict in U.S. history. Additional claims against the pipeline owner were settled for $98 million. More than twenty-five years after the tragic spill, the Exxon Valdez spill is still considered one of the most devastating human-caused environmental disasters. In addition, Keller Rohrback Managing Partner Lynn Sarko was appointed to serve as the Administrator of the Exxon and Alaska Qualified Settlement Funds.



Photo: Mark Colman

Andrews v. Plains All American Pipeline, No. 2:15-cv-04113 (C.D. Cal.)

Keller Rohrback serves as interim co-lead counsel representing fisherman, fish processors, tour companies, and others affected by the May 2015 spill from Plains All American's Line 901 pipeline in Santa Barbara County. The oil spill contaminated pristine beaches, closed critical fishing grounds, and damaged natural resources throughout the region. Keller Rohrback seeks compensation for victims of the spill for their present and future damages and to hold Plains accountable for the harm it caused to the local economy and environment.

ENVIRONMENTAL LITIGATION

REPRESENTATIVE CASES continued

Meeker v. Bullseye Glass Co., No. 16CV07002, Circuit Court of the State of Oregon, County of Multnomah

Keller Rohrback has filed the first and only complaint against Bullseye Glass company for contaminating a residential neighborhood in Portland Oregon by emitting hazardous levels of arsenic, cadmium, lead, chromium, and other toxic materials from its facility. Despite using thousands of pounds a year of dangerous heavy metals, Bullseye Glass has used no pollution control technology at all for more than four decades. Using innovative air and soil monitoring, Keller Rohrback is helping this neighborhood to protect itself and hold Bullseye accountable for the harm it has caused.

Wishtoyo Foundation v. Magic Mountain, No. 2:12-cv-05600 (C.D. Cal.)

Keller Rohrback worked with a team of environmental lawyers on behalf of Los Angeles-based clients who successfully negotiated a groundbreaking settlement with Six Flags Magic Mountain to address its stormwater pollution discharged to the Santa Clara River. The settlement significantly reduced the amount of heavy metals and other pollutants entering the Santa Clara from the amusement park by requiring the facility to install state-of-the-art technology, develop and implement a comprehensive site management plan, and fully comply with the Clean Water Act. Additional monetary payments made by Six Flags as a result of the case are being used to perform critical habitat restoration and mitigation projects along the Santa Clara River.

Mapleton Groundwater Litigation (Ruff v. Ensign-Bickford Industries, Inc.), No. 2:99-cv-120B (D. Utah)

Keller Rohrback attorneys successfully litigated a series of groundwater contamination suits against multiple international Defendants accused of releasing hazardous chemicals into the watershed over six decades. The suits were brought on behalf of individuals and their families against Defendants who owned a former explosives plant in Mapleton, Utah. The Plaintiffs alleged that improper waste disposal caused contaminants to seep into the groundwater and that the chemicals caused property damage and non-Hodgkin's lymphoma cancers affecting numerous residents. The matter involved complex scientific issues related to hydrogeology, chemical migration pathways, aquifer dynamics, clean-up methods, and contaminant degradation. The litigation resolved prior to trial after lengthy evidentiary hearings at which Plaintiffs received favorable Daubert rulings.



Photo: Mark Colman

Clean Water Act Enforcement – General Magnaplate

In partnership with the non-profit Environmental Defense Center, one of the oldest environmental organizations in the United States, Keller Rohrback L.L.P. helped reach a final settlement with General Magnaplate California to control the significant pollutants the company discharged via stormwater into the fragile Santa Clara River. Under the settlement, General Magnaplate agreed to implement enhanced storm water management measures at its electroplating facility to ensure that storm water runoff does not contain high levels of pollutants that pose a threat to human health and the environment. These measures include installing effective treatment technology and repairing paved surfaces. In addition, General Magnaplate will contribute $15,000 to the Rose Foundation for Communities and the Environment to be used to improve the water quality in the Santa Clara River watershed.

INTERNATIONAL LAW

ATTORNEYS

Lynn Lincoln Sarko
Laurie Ashton
Alison Chase
Juli Farris
Gary A. Gotto
Ian Mensher

Keller Rohrback has experience in international forums. Keller Rohrback clients include sovereign nations, state and local governments, sovereign Native American tribes, and quasi-governmental agencies where international agreements or other tort or statutory claims are at issue.

Keller Rohrback has been honored to represent sovereigns in litigation and arbitration matters involving governmental and business entities. The firm currently has three cases pending in the International Court of Justice and is pursuing a breach of treaty claim on behalf of a sovereign nation. Keller Rohrback is also investigating environmental contamination claims on behalf of a sovereign nation.

Keller Rohrback attorneys have represented clients in international arbitration proceedings, including International Centre for Dispute Resolution and International Chamber of Commerce arbitrations, as well as ad hoc arbitrations conducted under the United Nations Commission on International Trade Law Arbitration Rules. Domestically, these international arbitrations have given rise to related litigation in U.S. courts, including confirmation and enforcement proceedings under the New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards.



In addition, Keller Rohrback attorneys have represented private clients with international interests in civil litigation in U.S. courts, including state and federal courts in California, New York, Illinois, and Texas. Keller Rohrback attorneys have litigated trademark claims on foreign-registered trademarks in several western European countries and have also succeeded in obtaining rulings to conduct depositions and other discovery in Russia for litigation matters pending in the U.S. federal courts. The firm has also represented claimants in insolvency proceedings in Canada, proceeding under the Companies' Creditors Arrangement Act.

Keller Rohrback is a member firm of several international organizations: the Global Justice Network, a consortium of international counsel working together and across borders for the benefit of victims; the International Financial Litigation Network of attorneys, who handle cross-border litigation in the finance arena; and the Sovereign Wealth Fund Institute, a global organization of asset managers and service providers.

REPRESENTATIVE CASES

The Republic of the Marshall Islands v. United States of America et al., No. 14-1885 (N.D. Cal.)

Keller Rohrback currently represents the Republic of the Marshall Islands (RMI), a sovereign nation, in an action for breach of the Treaty on the Non-Proliferation of Nuclear Weapons, and in multiple similar cases pending at the International Court of Justice against the United Kingdom, India, and Pakistan. For this ground-breaking work, Keller Rohrback has been nominated by the International Peace Bureau for the 2016 Nobel Peace Prize as part of the international legal team representing the RMI, together with the RMI's former Foreign Minister, Tony deBrum, who initiated the litigation.

SECURITIES AND FINANCIAL FRAUD

ATTORNEYS

Lynn Lincoln Sarko
Alison Chase
Juli Farris
Eric Fierro
Matthew Gerend
Gary A. Gotto
Benjamin Gould
Mark Griffin
Dean N. Kawamoto
Ron Kilgard
David Ko
Derek W. Loeser
Ryan McDevitt
Ian Mensher
Michael W. Meredith
Gretchen Obrist
David S. Preminger
Erin Riley
Karin B. Swope
Havila C. Unrein
Amy Williams-Derry

Keller Rohrback enjoys a national reputation for excellence in prosecuting securities and financial fraud matters. We represent a variety of investors ranging from classes of individuals to large institutions. Many of our cases reflect recent financial scandals: we are pursuing claims against a group of international banks for rigging LIBOR; we represent investors in connection with their purchases of billions of dollars of mortgage-backed securities; and we pursued claims on behalf of employee benefit plans in connection with the Madoff Ponzi scheme. While our experience is diverse, our approach is simple and straightforward: we master the factual and legal bases for our claims with a focus on providing clear and concise explanations of the financial fraud and why our clients are entitled to recover.

REPRESENTATIVE CASES & SUCCESSES

Federal Home Loan Bank Litigation

Keller Rohrback has played a prominent role in large securities fraud and other investment cases litigated across the country involving mortgage-backed securities. Keller Rohrback has been retained by several Federal Home Loan Banks (FHLBs) to pursue securities and common law claims against dozens of issuers, underwriters, and sponsors of mortgage-backed securities. The FHLB complaints named more than 120 defendants and involved over 200 securities with a collective original face value of $13 billion. The relief sought by the FHLBs includes rescission and damages under state blue sky laws and the federal securities laws. We have recovered hundreds of millions of dollars on behalf of our clients to date.

In re the Bank of New York Mellon (as Trustee), No. 651786/2011 (N.Y. Sup. Ct.)

Keller Rohrback was a member of the three-firm steering committee addressing significant mortgage repurchase issues that impacted institutional investors. Keller Rohrback represented certificate holders who intervened in a proposed $8.5 billion settlement initiated by Bank of New York Mellon, as Trustee of 530 Countrywide mortgage-backed securities trusts. Our firm played a lead role in discovery and the eight-week bench trial in New York contesting the fairness of the settlement. The objection we pursued and tried was the only objection that the trial court sustained.

In re LIBOR-Based Financial Instruments Antitrust Litig., No. 11-2262 (S.D.N.Y.)

Keller Rohrback represents institutional funds pursuing antitrust claims based on the manipulation of the London Interbank Offered Rate (LIBOR) by the international panel of banks entrusted to set that rate. Multiple government investigations have revealed that certain panel banks manipulated LIBOR to mislead the markets and investors about the state of their financial health. The case is in discovery.

Diebold v. Northern Trust Investments, N.A., 09-1934 (N.D. Ill.)

Keller Rohrback was Class Counsel in this class action litigation against Northern Trust alleging that Northern Trust imprudently structured and managed its securities lending program by improperly investing cash collateral in long term debt, residential mortgage-backed securities, SIVs, and other risky and illiquid assets. On August 7, 2015, Judge Susan E. Cox approved the allocation plan for a $36 million settlement.

SECURITIES AND FINANCIAL FRAUD

SUCCESSES continued

Louisiana Firefighters' Retirement System v. Northern Trust Investments, N.A., No. 09-7203 (N.D. Ill.)

Keller Rohrback is Co-Lead Counsel in this securities lending litigation, a class action brought on behalf of four public retirement systems alleging that Northern Trust breached its fiduciary and contractual duties to investors when it imprudently structured and managed its securities lending program by improperly investing cash collateral in long-term debt, residential mortgage-backed securities, SIVs, and other risky and illiquid assets, rather than conservative, liquid investments. Plaintiffs allege that Northern Trust's imprudent management of the collateral pools caused Plaintiffs and other investors to suffer hundreds of millions of dollars in losses. On May 6, 2011, the Honorable Robert W. Gettleman denied in significant part Defendants' motion to dismiss. Plaintiffs also successfully defeated Defendants' third party complaint. The Court thereafter approved a partial settlement of $24,000,000 in cash, plus interest earned thereon, which represents settlement of the indirect lending claims of settlement class members.

In re Bank of New York Mellon Corp. Forex Transactions Litigation, No. 12-2335 (S.D.N.Y.)

Keller Rohrback served as Lead ERISA Counsel in this class action against the Bank of New York Mellon arising from its undisclosed charges for Standing Instruction Foreign Currency ("SI FX") transactions. Plaintiffs allege that from January 12, 1999 to the present, Bank of New York Mellon breached its fiduciary duties by failing to prudently and loyally manage the Plan's foreign currency transactions in the best interests of the participants, failing to disclose fully the details of the relevant SI FX transactions it was undertaking on behalf of the Plans, and engaging in prohibited transactions. In March 2015, a global resolution of the private and governmental enforcement actions was announced in which $504 million will be paid back to BNY Mellon customers—$335 million of which is directly attributable to funds received in the class litigation.

Madoff Direct & Feeder Fund Litigation: Hartman v. Ivy Asset Management LLC, No. 09-8278 (S.D.N.Y.)

Keller Rohrback successfully litigated this direct action on behalf of the trustees of seventeen employee benefit plans damaged by the Madoff Ponzi scheme. The action alleged that Ivy Asset Management and J.P. Jeanneret Associates, Inc. breached their fiduciary duties under ERISA by causing the plans to be invested directly or indirectly in Madoff funds. Keller Rohrback obtained a settlement of over $219 million in this case and related actions, including claims brought by the United States Secretary of Labor and the New York Attorney General.

In re IKON Office Solutions, Inc. Securities Litigation, MDL No. 1318 (E.D. Pa.)

Keller Rohrback served as Co-Lead Counsel representing the City of Philadelphia and eight other lead Plaintiffs in this certified class action alleging securities fraud. Class counsel achieved the highest securities fraud settlement at that time in the Eastern District of Pennsylvania by settling with Defendant IKON Office Solutions, Inc. for $111 million. The settlement was listed as one of the "largest settlements in class-action securities-fraud lawsuits since Congress reformed securities litigation in 1995" by *USA Today.*

In re Apple Computer, Inc. Derivative Litigation, No. 06-4128 (N.D. Cal.)

Keller Rohrback served on the Management Committee in this federal derivative shareholder action against nominal Defendant Apple Computer, Inc. and current and former directors and officers of Apple. Plaintiffs pursued breach of fiduciary duty, unjust enrichment, and gross mismanagement claims arising from backdated stock options granted between 1993 and 2001, which diverted millions of dollars of corporate assets to Apple executives. We achieved a settlement that awarded $14 million—one of the largest cash recoveries in a stock backdating case—and that required Apple to adopt a series of unique and industry-leading corporate enhancements.

KELLER ROHRBACK
LAW OFFICES ◆ L.L.P.



RAYMOND FARROW

CONTACT INFO

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rfarrow@KellerRohrback.com

PRACTICE EMPHASIS

- Antitrust and Trade Regulation
- Class Actions
- Consumer Protection
- Financial Products and Services

EDUCATION

University of Manchester (England)

B.A., 1979, Economics

University of Essex (England)

M.A., 1980, Economics

Princeton University

M.A., 1984, Economics

University of Washington School of Law

J.D., 2001

Raymond Farrow understands the economics behind his clients' cases. Ray, a member of Keller Rohrback's nationally recognized Complex Litigation Group, is a litigation attorney whose practice focuses on antitrust and consumer protection. His background as an academic economist and teacher makes him uniquely qualified to work with economic experts and to communicate statistics and economic analysis to his clients and to the Court.

Working on antitrust matters, Ray must navigate the rules and issues of varied industries, including hi-tech industries involving constantly changing software and hardware. His many years of experience, strong working relationships with other antitrust litigators, and motivation to redress genuine harms to his clients help him tackle complex issues in litigation and across the negotiating table. Most recently, Ray represented 20,000 nurses in a lawsuit that alleged a conspiracy by certain hospitals in Detroit to depress compensation levels that recovered almost $90 million for the nurses.

Prior to law school, Ray was a member of the Economics Department faculty at Seattle University, University of Washington, and Queen's University in Canada. While in law school, he served as Articles Editor of the Washington Law Review and as an intern for the U.S. Department of Labor.

In his spare time, Ray enjoys playing soccer and skiing.

BAR & COURT ADMISSIONS

2001, Washington

PROFESSIONAL & CIVIC INVOLVEMENT

King County Bar Association, *Member*

Washington State Bar Association, *Member*

Order of the Coif, *Member*

American Economic Association, *Member*

Washington State Trial Lawyers' Association, *Member*

American College of Trust and Estate Counsel, *Fellow*

PUBLICATIONS & PRESENTATIONS

Raymond J. Farrow, *Notes & Comments: Qualifying Immunity: Protecting State Employees' Right to Protect Their Employment Rights After Alden v. Maine*, 76 Wash. U. L. Rev. 149 (2001).

KELLER ROHRBACK
LAW OFFICES ◆ L.L.P.



MARK GRIFFIN

CONTACT INFO

1201 Third Avenue, Suite 3200

Seattle, WA 98101

(206) 623-1900

mgriffin@KellerRohrback.com

PRACTICE EMPHASIS

- Antitrust & Trade Regulation
- Class Actions
- Commercial Litigation
- Consumer Protection
- Intellectual Property
- Mass Personal Injury
- Securities

EDUCATION

Marquette University

B.S., *magna cum laude*, 1983, Economics Faculty Award

Gonzaga University School of Law

J.D., *magna cum laude*, 1986, Thomas More Scholar

Mark Griffin has over 25 years of experience in antitrust litigation. As a member of Keller Rohrback's nationally recognized Complex Litigation Group, Mark has litigated over 80 class action cases to successful conclusions. Mark joined Keller Rohrback in 1988 after serving as a judicial law clerk for Magistrate Judge Philip K. Sweigert of the U.S. District Court for the Western District of Washington. He helped launch the firm's antitrust practice with achievements including $49.5 million in settlements in the *Specialty Steel Pipe Antitrust Litigation*, paving the way for the firm's success in other class action litigation. Mark has been a partner at Keller Rohrback for almost 20 years, has served on the firm's Executive Committee since 2001, and has chaired the Antitrust Practice Group since 2007. Most recently, his leadership in an antitrust class action resulted in settlements totaling almost $90 million for registered nurses employed by hospitals in Detroit, (Cason-Merenda v. VHS Michigan, Inc.).

Since 2004, Mark has volunteered his time as pro bono coordinator at Keller Rohrback. He serves as a member of the Board of Trustees of the Legal Foundation of Washington (LFW) and previously as a board member and officer of the Legal Aid for Washington Fund (LAW Fund). The LFW and the LAW Fund through their Campaign for Equal Justice raise charitable contributions to ensure that justice is a reality, not just for those who can afford it, but for everyone in Washington state. In 2013, the firm received the President's Award from the LFW for its work in *Jerry Cooper, Inc. v. Lifequotes of America, Inc.*, a case in which Mark helped achieve judgments totaling over $760 million in favor of the plaintiff class. Mark also volunteers at Public Justice and has served as chair of the Consumer Protection, Antitrust & Unfair Business Practices Section of the Washington State Bar Association.

BAR & COURT ADMISSIONS

1986, Washington

2010, Arizona

1986, U. S. District Court for the Western District of Washington

1989, U. S. Court of Appeals for the Ninth Circuit

1990, U. S. District Court for the Eastern District of Washington

1993, U. S. Supreme Court

2008, U. S. Court of Appeals for the Fourth Circuit

2009, U. S. District Court for the Eastern District of Michigan

2009, U. S. District Court for the District of Columbia

2010, U. S. Court of Appeals for the Eleventh Circuit

2013, U.S. Court of Appeals for the Sixth Circuit

2014, U.S. Court of Appeals for the Tenth Circuit

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HONORS & AWARDS

AV Rating, Martindale-Hubbell, 2000-Present

President's Award, Legal Foundation of Washington, 2013

Named to Washington Super Lawyers list, 2011-2012, 2014-2016

Named a Rising Star, Super Lawyers – Washington, 2000

Thomas More Scholarship, 1983-1986

American Jurisprudence Award in Antitrust, 1986

American Jurisprudence Award in Remedies, 1986

American Jurisprudence Award in Agency and Partnerships, 1985

American Jurisprudence Award in Corporations, 1985

American Jurisprudence Award in Property, 1984

Alpha Sigma Nu (National Jesuit Honors Society) 1983

Beta Gamma Sigma (National Business Honors Society), 1982

Pi Sigma Alpha (National Political Science Honor Society), 1982

Pi Gamma Mu (International Honor Society in Social Science), 1982

Economics Faculty Award (outstanding student majoring in economics) 1983

Delta Sigma Pi Scholarship, 1979-1983

PROFESSIONAL & CIVIC INVOLVEMENT

King County Bar Association, *Member*

Washington State Bar Association, *Member*; Executive Committee and Chair-elect of the Antitrust, Consumer Protection & Unfair Business Practices Section

American Bar Association, *Member*; Litigation and Antitrust sections

Washington State Trial Lawyer's Association, *Member*

Federal Bar Association, *Member*

PUBLICATIONS & PRESENTATIONS

"The Future of Reverse Payment Settlement Agreements after *FTC v. Actavis*," 30th Annual Antitrust, Consumer Protection and Unfair Business Practices Seminar, November 8, 2013

"Intellectual Property v. Cultural Property: From Colonization to Co-Existence," Intellectual Property Institute of Canada, September 27, 2013

Contributor, "Concurrent Antitrust Criminal and Civil Proceedings: Identifying Problems and Planning for Success," American Bar Association, 2013

"Profile/Lynn Sarko: Leading the Way," Bar Bulletin, December, 2011

"Cy Pres – News on Recent Decisions which may affect cy pres in the future," LAW Fund Executive Committee Meeting, September 15, 2011

"Current Issues in Antitrust, *Twombly* Pleading Standards" (speaking for Mark Samson), State Bar of Arizona, June 20, 2008

The New Rules for Business Litigators: Keeping Ahead of the Curve, "The New Rules in Class Action Litigation," Washington State Bar Association, November 13, 2007

Executive Editor, Washington Antitrust and Consumer Protection Handbook (2007 Supplement)

"Message from the Chair," Antitrust, Consumer Protection Unfair Business Practices Newsletter, Washington State Bar Association, Fall 2005

Program Chair, "The Essentials of Civil Settlement Strategies," Washington State Bar Association, October 8, 2003

Executive Editor, Washington Antitrust and Consumer Protection Handbook (Third Edition 2001)

Program Co-Chair, 2001 Antitrust, Consumer Protection and Unfair Business Practices Conference, Washington State Bar Association, November 9, 2001

Moderator, "How to Avoid Antitrust Actions Against Your Business Clients," Washington State Bar Association, November 6, 1998

Program Committee, "1995 and Counting: A Symposium on Practices, Procedures and Professionalism," Federal Bar Association of Western Washington, December 6, 1995

Program Committee, "Trials Viewed from the Bench: See What We See," Federal Bar Association of Western Washington, December 7, 1994

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Questions of Law Column on Antitrust Law, Washington State Bar Association, 1992

Program Co-Chair, "Trial Practice Seminar," King County Bar Association, 1991

"Civil Service Protections for Police Officers," Washington State Council of Police Officers, October 12, 1989

"Contractual Liability of Companies and Individuals," International Television Association, Seattle Chapter, Legal Workshop, April 19, 1989

Note on Meier and Meier, 595 P.2d 474 (1979), 1986 Canadian-American Law Journal

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AMY N. L. HANSON

CONTACT INFO

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PRACTICE EMPHASIS

- Antitrust & Trade Regulation
- Consumer & Data Privacy Protection
- Employee Benefits & Retirement Security
- Mass Personal Injury

EDUCATION

University of Minnesota

B.A., *summa cum laude*, 1995, Economics and Political Science

University of Wisconsin Law School

J.D., 1998

Amy Hanson helps her clients work past disputes so they can refocus on personal and business goals. As a member of Keller Rohrback's nationally recognized Complex Litigation Group, Amy's practice is focused on class action and other complex litigation. Amy is a practical problem-solver who enjoys rolling up her sleeves to obtain evidence and achieve solutions. She became interested in complex litigation because she wanted to help level the playing field for hard-working people and small businesses that were similarly harmed by large businesses and groups of businesses acting together. In her more than 17 years as a litigator Amy has represented patients who experienced serious medical problems after consuming prescription drugs, small business owners who challenged alleged nationwide price fixing conspiracies, employees who challenged the prudence of allowing their employers' 401(k) plans to hold and acquire company stock and employees who challenged the reasonableness of their employers' data security practices.

Prior to joining Keller Rohrback, Amy was a Student Advocate at the University of Wisconsin Law School's Consumer Litigation Clinic and a judicial law clerk intern for Judge Deininger at the State of Wisconsin Court of Appeals. She is currently honored to serve on the Vioxx Consumer Purchase Claims Subcommittee of the Plaintiffs' Steering Committee in *In re: Vioxx Prods. Liab. Litig.*, MDL No. 1657 (E.D.La.) and the WSAJ Consumer Protection Section Deskbook Editorial Board.

BAR & COURT ADMISSIONS

1998, Wisconsin

1998, Washington

1998, U.S. District Court for the Western District of Washington

2000, U.S. District Court for the Eastern District of Washington

2003, U.S. Court of Appeals for the Ninth Circuit

2005, U.S. District Court for the Eastern District of Michigan

PROFESSIONAL & CIVIC INVOLVEMENT

American Association for Justice, *Member*

American Bar Association, *Member*

King County Bar Association, *Member*

Washington State Association for Justice, *Member*

Washington State Bar Association, *Member*

HONORS & AWARDS

Named to Washington Super Lawyers list, 2016

PUBLICATIONS & PRESENTATIONS

Co-author, *Handbook for Washington Seniors: Legal Rights and Resources*, Legal Voice (Oct. 15, 2012).

KELLER ROHRBACK
LAW OFFICES ◆ L.L.P.



MARK D. SAMSON

CONTACT INFO

3101 North Central Avenue, Suite 1400

Phoenix, AZ 85012

(602) 248-2822

msamson@KellerRohrback.com

PRACTICE EMPHASIS

- Medical Malpractice Litigation
- Products Liability - Plaintiffs
- Personal Injury Litigation
- Commercial Litigation
- Complex Litigation

EDUCATION

Arizona State University

B.S., summa cum laude, 1976, Bio-Ag Sciences

Washington State University College of Veterinary Medicine

D.V.M., summa cum laude, 1980

Washington State University College of Veterinary Medicine

M.S., 1983, Veterinary Anatomy

Arizona State University College of Law

J.D., summa cum laude, 1986, Order of the Coif

As a licensed veterinarian, Mark's medical knowledge helps get his clients the results they deserve. Given his strong medical science background, Mark's practice focuses on tort law, including medical negligence, product liability, and other significant personal injury cases. He has nearly 30 years of experience litigating medical malpractice cases with victories including the landmark Edwards verdict, a transfusion-associated AIDS case which remains one of the largest personal injury verdicts in Arizona history. Mark was born in New York, but he moved to the Phoenix area in 1959 and grew up there. He practiced from 1986 to 1995 at Meyer, Hendricks, Victor, Osborn & Maledon, becoming a member in 1992. In 1995, Mark formed Dalton Gotto Samson & Kilgard, P.L.C. ("DGSK") and was one of the members of DGSK who formed Keller Rohrback P.L.C. in 2002.

BAR & COURT ADMISSIONS

1986, Arizona

1986, U.S. District Court for the District of Arizona

1986, U.S. Court of Appeals for the Ninth Circuit

1986, U.S. Supreme Court

2008, Washington, D.C.

PROFESSIONAL & CIVIC INVOLVEMENT

Maricopa County Bar Association, *Member*

Arizona State Bar Association, *Member*

American Association for Justice, *Member*

Arizona Association for Justice, *Sustaining Member*

PUBLICATIONS & PRESENTATIONS

Speaker, National Meeting of American Veterinary Medical Law Association, Tort and regulatory issues affecting veterinarians,1995.

Chairman, Maricopa County Bar Association Seminar on Anatomy, 1994.

Chairman, Maricopa County Bar Association Seminar on Medical Malpractice in the Ages of Disclosure.

Speaker, Arizona Trial Lawyers Association Medical Malpractice Seminar, *Use of medical literature in the courtroom*, 1996; New legal theories in medical malpractice, 1999.

Co-Chair, Arizona Trial Lawyers Association, Anatomy of Pain, 2002.

Speaker, Arizona Veterinary Medical Association, *Application of legal principles to veterinary medicine*, 1999-2003.

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PUBLICATIONS & PRESENTATIONS (CONT)

Speaker Arizona Paralegal Association, Settlement conferences versus trial in medical malpractice cases, 2002; Changes and issues in Arizona's ethical rules for attorneys, 2003.

Maricopa County Bar Association, P*unitive Damages after Campbell v. State Farm*, May 2003.

Chairman, Arizona State Bar, New Ethical Rules in Arizona, Oct. 2003.

Maricopa County Bar Association, Liens Again, 2004.

Maricopa County Bar Association, Arizona Appellate Update, 2005.

Co-Chairman, Arizona Trial Lawyers Association, Liens, Jan. 2006.

Blackwell's 5-Minute Veterinary Manager, Negotiation (2006).

Chairman, Arizona Trial Lawyers Association, *Rapid Fire on Litigation Issues*, Oct. 2006.

Co-Chairman, Arizona Trial Lawyers Association, Trial Practice - Damages, 2007.

Arizona Trial Lawyers Association, Issues in FTCA Claims, 2008.

Arizona Trial Lawyers Association, *Loss of a Chance in Med Mal Cases,* 2008.

KELLER ROHRBACK

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New York, NY 10036
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RONAN

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Ronan, MT 59864
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EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT

TIME REPORT- SUMMARY

Firm Name: Keller Rohrback

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	HOURLY RATE	TOTAL LODESTAR
Ray Farrow (P)	2.60		2.50			3.10		1.40	1.20						10.80	$750.00	$8,100.00
Ray Farrow (P)	5.10	3.40	0.40					1.40	2.10	0.20	2.10				14.70	$895.00	$13,156.50
Mark Griffin (P)									0.20		0.30				0.50	$525.00	$262.50
Amy Hanson (A)	1.20					1.10									2.30	$850.00	$1,955.00
Mark Samson (P)	1.80														1.80	$940.00	$1,692.00
															0.00	$0.00	$0.00
SUB-TOTAL	**10.70**	**3.40**	**2.90**	**0.00**	**0.00**	**4.20**	**0.00**	**2.80**	**3.50**	**0.20**	**2.40**	**0.00**	**0.00**	**0.00**	**30.10**		**$25,166.00**

NON-ATTORNEYS																
Darla Marshall (PL)	0.30							1.30						1.60	$225.00	$360.00
Brian Spangler (PL)										0.30				0.30	$225.00	$67.50
														0.00	$0.00	$0.00
SUB-TOTAL	**0.30**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.30**	**0.00**	**0.00**	**0.30**	**0.00**	**0.00**	**0.00**	**1.90**		**$427.50**
GRAND TOTAL:	**11.00**	**3.40**	**2.90**	**0.00**	**0.00**	**4.20**	**0.00**	**4.10**	**3.50**	**0.20**	**2.70**	**0.00**	**0.00**	**0.00**	**32.00**		**$25,593.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

KELLER ROHRBACK L.L.P.

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Ray Farrow	06/01/2013 -09/21/2016	$750
Ray Farrow	09/22/2016 - 02/28/2017	$895
Mark Griffin	06/01/2013 – 02/28/2017	$525
Amy Hanson	06/01/2013 – 02/28/2017	$850
Mark Samson	06/01/2013 – 02/28/2017	$940
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Darla Marshall	06/01/2013 – 02/28/2017	$225
Brian Spangler	06/01/2013 – 02/28/2017	$225

EXHIBIT D

(REDACTED)

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Raymond J. Farrow**		
29554	**Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions**		
29554	**Matter ID: 29554-8**		
7/8/2013	RJF	[redacted]	0.20
		Matter ID: 29554-8	0.20
		Matter Description (First Line): Drafting Pleadings, Briefs &	0.20
29554	**Matter Description (First Line): Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, Etc**		
29554	**Matter ID: 29554-9**		
9/22/2016	RJF	[redacted]	1.20
		Matter ID: 29554-9	1.20
		Matter Description (First Line): Reading/Reviewing Pleadings,	1.20
		Professional: Raymond J. Farrow	1.40

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Mark A. Griffin**		
29554	**Matter Description (First Line): Drafting Discovery Answers/Responses**		
29554	**Matter ID: 29554-3**		
11/17/2015	MAG	[redacted]	0.40
		Matter ID: 29554-3	0.40
		Matter Description (First Line): Drafting Discovery	0.40
29554	**Matter Description (First Line): Drafting Discovery Requests**		
29554	**Matter ID: 29554-2**		
8/16/2013	MAG	[redacted]	0.40
11/22/2013	MAG	[redacted]	0.30
12/2/2013	MAG	[redacted]	0.50
12/4/2013	MAG	[redacted]	0.20
1/22/2014	MAG	Review order on motion to dismiss (.2);, [redacted]	0.40
7/9/2014	MAG	Review order terminating client's case (.2); [redacted]	0.60
		Matter ID: 29554-2	2.40
		Matter Description (First Line): Drafting Discovery Requests	2.40
29554	**Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions**		
29554	**Matter ID: 29554-8**		
7/5/2013	MAG	[redacted]	0.40

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
7/8/2013	MAG	[redacted]	1.00
		Matter ID: 29554-8	1.40
		Matter Description (First Line): Drafting Pleadings, Briefs &	1.40
29554		**Matter Description (First Line): Investigations, Factual Research**	
29554		**Matter ID: 29554-1**	
7/9/2013	MAG	[redacted]	0.40
7/10/2013	MAG	[redacted]	0.40
7/13/2013	MAG	[redacted]	0.40
7/19/2013	MAG	[redacted]	0.20
7/19/2013	MAG	[redacted]	0.20
7/22/2013	MAG	[redacted]	0.50
7/25/2013	MAG	Review letter scheduling conference (.3); [redacted]	1.00
7/26/2013	MAG	[redacted]	0.40
7/31/2013	MAG	[redacted]	0.40
8/23/2013	MAG	[redacted]	0.20
10/16/2015	MAG	[redacted]	0.20
1/22/2016	MAG	[redacted]	0.20
		Matter ID: 29554-1	4.50
		Matter Description (First Line): Investigations, Factual Research	4.50

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Matter Description (First Line): Litigation Strategy, Analysis & Case Management**		
29554	**Matter ID: 29554-11**		
6/5/2013	MAG		0.20
6/11/2013	MAG		0.50
6/25/2013	MAG		0.20
7/2/2013	MAG		0.40
3/3/2016	MAG		0.20
7/22/2016	MAG		0.40
10/12/2016	MAG		0.20
		Matter ID: 29554-11	2.10
		Matter Description (First Line): Litigation Strategy, Analysis &	2.10
29554	**Matter Description (First Line): Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, Etc**		
29554	**Matter ID: 29554-9**		
7/17/2013	MAG	Review order reassigning judge	0.20
4/11/2014	MAG		0.50
4/25/2014	MAG	Review motions to dismiss	1.00
2/13/2015	MAG		0.40
		Matter ID: 29554-9	2.10
		Matter Description (First Line): Reading/Reviewing Pleadings,	2.10
		Professional: Mark A. Griffin	12.90

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Amy Hanson**		
29554	**Matter Description (First Line): Litigation Strategy, Analysis & Case Management**		
29554	**Matter ID: 29554-11**		
2/13/2015	ALH	[redacted]	0.20
		Matter ID: 29554-11	0.20
		Matter Description (First Line): Litigation Strategy, Analysis &	0.20
		Professional: Amy Hanson	0.20

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Darla Marshall**		
29554	**Matter Description (First Line): Drafting Pleadings, Briefs & Pretrial Motions**		
29554	**Matter ID: 29554-8**		
7/15/2013	DM	[redacted]	0.30
		Matter ID: 29554-8	0.30
		Matter Description (First Line): Drafting Pleadings, Briefs &	0.30
		Professional: Darla Marshall	0.30

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Mark D. Samson**		
29554	**Matter Description (First Line): Discovery Meet & Confer**		
29554	**Matter ID: 29554-6**		
8/1/2013	MDS	Review court order adding case to MDL (.2); [redacted]	0.60
11/19/2013	MDS	[redacted]	0.50
		Matter ID: 29554-6	1.10
		Matter Description (First Line): Discovery Meet & Confer	1.10
29554	**Matter Description (First Line): Investigations, Factual Research**		
29554	**Matter ID: 29554-1**		
7/18/2013	MDS	[redacted]	0.40
7/19/2013	MDS	[redacted]	0.80
		Matter ID: 29554-1	1.20
		Matter Description (First Line): Investigations, Factual Research	1.20
		Professional: Mark D. Samson	2.30

Transactions Complex Litigation Time

matter id contains '29554' and fees and dates between 6/1/13 and 2/28/17 and not on hold

Date	Prof	Narrative	Units
29554	**Professional: Brian E. Spangler**		
29554	**Matter Description (First Line): Litigation Strategy, Analysis & Case Management**		
29554	**Matter ID: 29554-11**		
6/11/2013	BES	[redacted]	0.20
7/2/2013	BES	[redacted]	0.10
		Matter ID: 29554-11	0.30
		Matter Description (First Line): Litigation Strategy, Analysis &	0.30
		Professional: Brian E. Spangler	0.30
		Grand Total	17.40

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
KELLER ROHRBACK L.L.P.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	$930.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	$305.20
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$10.25
Photocopies – Outside	
Postage	
Service of Process	$512.35
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	**$1,761.65**

EXHIBIT 34

Robert J. Gralewski, Jr. (196410)
KIRBY McINERNEY LLP
600 B Street, Suite 2110
San Diego, California 92101
Tel: (619) 784-1442
bgralewski@kmllp.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ROBERT J. GRALEWSKI, JR. IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KIRBY MCINERNEY LLP**

I, Robert J. Gralewski, Jr., declare:

1. I am a partner at Kirby McInerney LLP ("Kirby"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Erinn Tozer and as counsel for IPPs throughout the course of this litigation. The background and experience of Kirby and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Kirby has performed vital work on behalf of the Class. For example, one of Kirby's native Japanese speaking lawyers – Sawa Nagano – has played an instrumental role in discovery. Because of Ms. Nagano's superior Japanese language skills and antitrust experience, Ms. Nagano has been tasked by Co-Lead Counsel with high-level assignments such as: (1) having primary responsibility with transliteration for objection responses, (2) selecting exhibits for, preparing for, actively assisting at, and serving as check translator at five depositions of Panasonic and Sanyo employees in 2015, 2016, and 2017,[1] and (3) deposition designations in preparation for trial. Co-Lead Counsel also regularly relied upon Ms. Nagano to perform a myriad of other important tasks ranging from utilizing Japanese terms to search for and

[1] Ms. Nagano performed these duties in connection with the depositions of Fumitsugu Tachihara, Minoru Kondo, Akihiro Shimizu, Kazuhiro Nakae, and Hiroshi Shimokomaki. Ms. Nagano traveled to Japan for Mr. Nakae's deposition.

locate hot documents to providing English translations of foreign language documents which have been used as exhibits at depositions and in motions. Additionally, William Harris (another experienced Kirby antitrust lawyer) and I have reviewed documents at the direction of Co-Lead Counsel. This work included drafting a memorandum summarizing the results of a targeted review to help prepare for the hearing on NEC's Motion to Dismiss.

5. Attached hereto as **Exhibit B** is a billing summary of Kirby's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Kirby. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Kirby and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Robert J. Gralewski, Jr., in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Kirby and filed on May 26, 2017. (ECF No. 1813-Ex. 22). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Kirby since June 1, 2013 was 4,292.60, with a corresponding lodestar of $1,932,491.50 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses Kirby has incurred from June 1, 2013 to present. Kirby expended a total of $135,439.09 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Kirby on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Kirby in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at San Diego, California.

/s/ Robert J. Gralewski, Jr.

Robert J. Gralewski, Jr.

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A



Kirby McInerney LLP is a specialist plaintiffs' litigation firm with expertise in antitrust, commodities, securities, structured finance, whistleblower, health care, consumer, and other fraud litigation.

KM has achieved and is pursuing landmark results in the fields of antitrust, commodities fraud, securities fraud, corporate governance, consumer, and health care, representing our clients in both class actions and individual litigation. KM has recovered billions of dollars for its clients.

KM has been appointed interim lead counsel in *In re North Sea Brent Crude Oil Futures Litig.*, No. 13-md-02475 (S.D.N.Y.), a case brought on behalf of commodity futures traders alleging that certain oil companies misreported or otherwise manufactured market information for crude oil prices. KM also is co-lead counsel in the antitrust action *In re Libor-Based Financial Instruments Antitrust Litig.*, No. 11-md-02262 (S.D.N.Y.), a case alleging the fixing of prices of a benchmark interest rate; and co-lead counsel for the indirect purchaser plaintiffs in *In re Ductile Iron Pipe Fittings ("DIPF") Indirect Purchaser Antitrust Litig.*, No. 12-cv-169 (D.N.J.), a case alleging the raising and fixing of prices in the market for ductile iron pipe fittings.

KM was also co-lead counsel on behalf of indirect purchasers in *In re BP Propane Indirect Purchaser Antitrust Litig.*, No. 06-cv-3541 (N.D.Ill. 2010) which resulted in a $15 million settlement on behalf of propane purchasers.

KM served as lead counsel to classes of indirect purchasers in connection with antitrust proceedings against Microsoft in *Charles Cox and Old Factories, Inc. v. Microsoft Corp.*, Index No. 105193/00, Part 3 (N.Y. Sup. Ct.); *Gordon, et al. v. Microsoft Corp.*, No. MC 00-5994 (Minn. Dist Ct. Hennepin County). These litigations resulted in settlements totaling nearly a billion dollars for consumers in the States of New York, Florida, Tennessee, West Virginia, and Minnesota (where the litigation proceeded to trial). The specific cases cited here, conducted on behalf New York and Minnesota consumers, resulted in recoveries of approximately $350 million and $175 million, respectively.

Additionally, KM acted as lead counsel in *In re Reformulated Gasoline (RFG) Antitrust and Patent Litig. and Related Actions*, No. 05-cv-01671 (C.D. Cal), an antitrust class action pertaining to Unocal's alleged manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which plaintiffs claim caused inflated retail prices. This litigation resulted in a $48 million settlement for indirect purchasers. KM also acted as one of the firms with primary responsibility for *In re Visa Check/MasterMoney Antitrust Litig.*, No. 96-cv-05238 (E.D.N.Y.), a case on behalf of a class of retailers in connection with Visa MasterCard policies pertaining to debit card fees. The litigation resulted in a settlement of over $3 billion for the class and landmark injunctive relief.

KM has been involved in some of the most cutting edge areas of market manipulation cases, including a seminal case involving Sumitomo Corporation's manipulation of the copper market. Of late, KM represented market makers and hedge funds in commodities manipulation cases involving silver, propane and fixed income

products. KM's experience in market manipulation and price fixing for both indirect and direct purchasers, in cases brought under the Sherman Act and state law analogs, spans the markets for gasoline, propane, cement, concrete, steel, potash, silver and even fixed income products.

Many of KM's attorneys are exceptionally well versed in antitrust and commodities litigation. David Kovel, the partner with our firm most involved in commodities litigation, was a commodities trader prior to receiving his JD/MBA and worked in the commodities export markets. As a commodities trader, Mr. Kovel took financial risk in futures and options markets and traded physical markets in U.S., Europe, Asia and Latin America. He became a specialist at trading in futures delivery markets and understanding the relationship between futures prices and the physical spot market. Prior to joining KM, Alice McInerney was Chief of the Investor Protection Bureau and Deputy Chief of the Antitrust Bureau of the New York Attorney General's office. Partner Daniel Hume and our associates too have exceptional antitrust experience.

Some notable KM antitrust work includes:

- *In re Visa Check/MasterMoney Antitrust Litig.*, No. 96-cv-5238 (S.D.N.Y.) (over $3 billion settlement in direct purchaser debit card fee case – KM was class counsel with second largest lodestar in the case);

- *Microsoft antitrust cases*: KM acted as a lead counsel to classes of indirect purchasers in connection with antitrust proceedings against Microsoft. The litigations resulted in settlement totaling nearly a billion dollars for consumers in the states of New York, Florida, Tennessee, West Virginia, and Minnesota (where the litigation proceeded to trial). We presently are helping lead a similar effort on behalf of consumers and government entities in Canada;

- *CRT and LCD Price Fixing Cases*: KM is playing a lead role in the Cathode Ray Tube indirect purchaser antitrust litigation that is approaching trial and played a significant role as well in the Liquid Crystal Display indirect purchaser litigation which recently settled for over $1 billion;

- *In re Reformulated Gasoline (RFG) Antitrust and Patent Litig. and Related Actions*, No. 05-cv-01671 (C.D. Cal. 2005) ($48 million settlement on behalf of indirect gasoline purchasers);

- *In re BP Propane Indirect Purchaser Antitrust Litig.*, No. 06-CV-3541 (N.D.Ill. 2010) ($15 million settlement on behalf of indirect propane purchasers);

- *In re Potash Antitrust Litig.*, No. 08-cv-06910 (N.D.Ill. 2008) (indirect purchaser price fixing case – pending on appeal);

- *In re Commodity Exchange, Inc., Silver Futures and Options Trading Litig.*, No. 11-md-02213 (S.D.N.Y. 2011) (market manipulation case pending);

- *Supreme Auto Transport LLC v. Arcelor Mittal et al.*, No. 08-cv-05468 (N.D. Ill. 2008) (indirect purchaser price fixing case pending); and

- *In re Sumitomo Copper Litig.*, No. 96-cv-4584 (S.D.N.Y. 1999) (counsel in matter involving settlement of over $140 million in market manipulation case).

CURRICULA VITAE



Roger W. Kirby is of counsel to the firm. He has written several articles on litigation, the Federal Rules of Civil Procedure and Federal Rules of Evidence that have been published by various reporters and journals, and has been on the board of editors of Class Action Reports. He has also lectured on aspects of securities litigation to various professional organizations in the United States and abroad. Mr. Kirby has enjoyed considerable success as a trial attorney, and cases for which he has had primary responsibility have produced landmark decisions in the fields of securities law, corporate governance, and deceptive advertising.

Some of Mr. Kirby's relevant work includes:

- Representation of a putative class of initial public offerors in *Cordes & Company Financial Services v A.G. Edwards & Sons, Inc*. On appeal to the Court of Appeals for the Second Circuit, the court reversed the decision below, and held that assignees may be class representatives. It also clarified the meaning of antitrust injury;

- Representation of an objector to the settlement in *Reynolds v. Beneficial National Bank* in the United States Northern District Court for the District of Illinois. Mr. Kirby and KM persuaded the Court of Appeals for the Seventh Circuit and ultimately the district court to overturn the settlement, and were then appointed co-lead counsel to the class. Mr. Kirby and KM were lauded by the presiding judge for their "intelligence and hard work," and for obtaining "an excellent result for the class.";

- Representation, as lead counsel, of a class of investors in *Gerber v. Computer Associates International, Inc.*, a securities class action that resulted in a multimillion dollar recovery jury verdict that was upheld on appeal; and

- Representation, as lead counsel, of purchasers of PRIDES securities in connection with the Cendant Corporation accounting fraud. Mr. Kirby was instrumental in securing an approximate $350 million settlement for the class – an unprecedented 100 percent recovery.

Mr. Kirby is admitted to the New York State Bar, the U.S. District Courts for the Southern and Eastern Districts of New York, the U.S. Courts of Appeals for the First, Second, Third, Fifth, Seventh, Eighth, Ninth, and Eleventh Circuits, the U.S. District Court, District of Connecticut, and the U.S. Supreme Court. He attended Stanford University & Columbia College (B.A.) and Columbia University School of Law (J.D.) where he was an International Fellow. He also attended The Hague Academy of International Law (Cert. D'Att.). Thereafter, he was law clerk to the late Honorable Hugh H. Bownes, U.S. District Court for New Hampshire, and the U.S. Court of Appeals for the First Circuit. He recently authored *Access to United States Courts By Purchasers Of Foreign Listed Securities In The Aftermath of Morrison v. National Australia Bank Ltd.*, 7 Hastings Bus. L.J. 223 (Summer 2011). Mr. Kirby is a visiting Law Fellow at the University of Oxford, St. Hilda's College, Oxford, U.K. Mr. Kirby is conversant in French and Italian.



Alice McInerney is of counsel to the firm and practices out of our New York office. She focuses on antitrust and consumer matters, and also handles securities class actions. Ms. McInerney joined the firm in 1995 and has over 30 years of experience as an attorney.

Prior to joining KM, Ms. McInerney was Chief of the Investor Protection Bureau and Deputy Chief of the Antitrust Bureau of the New York Attorney General's office. While there, she chaired the Enforcement Section of the North American Securities Administrators Association and also chaired the Multi-State Task Force on Investigations for the National Association of Attorneys General. Alice is also a member of the National Association of Public Pension Attorneys (NAPPA).

Some of Ms. McInerney's relevant work includes:

- Representation, as lead and co-lead counsel, of consumer classes in antitrust cases against Microsoft. These litigations resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota;

- Representation of a class of retailers in *In re Visa Check/Master Money Antitrust Litigation*, an antitrust case which resulted in a settlement of over $3 billion for the class;

- Representation of public entities in connection with ongoing Medicaid fraud and false claims act litigations arising from health expenditures of these state and local governmental entities; and

- Representation of California homeowners in litigation arising from mortgage repayment irregularities. Litigation resulted in settlements that afforded millions of California homeowners clear title to their property. The cases resulted in the notable decision *Bartold v. Glendale Federal Bank*.

Ms. McInerney is admitted to the New York State Bar, all U.S. District Courts for the State of New York, the U.S. Court of Appeals for the Second Circuit and the United States Supreme Court. She graduated from Smith College (B.A. 1970) and Hofstra School of Law (J.D. 1976).



David Bishop is a partner practicing out of our New York office, where he coordinates domestic client and government relations. Mr. Bishop joined the firm in 2006 following a distinguished career in local government. Mr. Bishop was elected to the Suffolk County Legislature in 1993 while still attending Fordham Law School. There he served in several leadership capacities, including Democratic Party Leader, Chairman of Public Safety and Chairman of Environment. His legislative record earned him recognition from the Nature Conservancy, the Child Care Council and the Long Island Federation of Labor.

As an attorney in private practice, Mr. Bishop has litigated numerous NASD arbitrations on behalf of claimants.

Recent cases in which Mr. Bishop has been involved include:

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation*, a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation, as lead counsel, of classes of consumers harmed by price fixing in the LCD flat panel and SRAM markets; and

- Representation, as co-lead counsel, of an investor class led by an individual investor in *Lapin v. Goldman Sachs*, a securities class action against Goldman Sachs. This litigation resulted in a recovery of $29 million for the class.

Mr. Bishop is admitted to the New York State Bar and the U.S. States District Court for the Eastern and Southern Districts of New York. He is a member of the Public Investors Arbitration Bar Association and of the New York City Bar Association. He graduated from American University (B.A., 1987) and from Fordham University (J.D., 1993).



Thomas W. Elrod is a partner based in our New York office focusing on securities, commodities, antitrust and whistleblower litigation. Mr. Elrod joined the firm in 2011.

Recent cases on which Mr. Elrod has worked include:

- *In re Citigroup Inc. Securities Litigation,* a class action, in which Kirby McInerney served as lead counsel, arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;
- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor Rates;
- Representation, as lead counsel on behalf of a proposed class of futures traders in *In re North Sea Brent Crude Oil Futures Litig.*, alleging benchmark manipulation;
- Representation, as co-lead counsel, of a proposed class of natural gas traders in a class action lawsuit against Total Gas & Power North America, Inc. (TGPNA) alleging price manipulation of physical natural gas as well as price manipulation of natural gas futures and other derivative natural gas contracts. This litigation is ongoing;
- Representation of municipal issuers of Auction Rate Securities in FINRA arbitrations alleging misrepresentations by underwriters;
- Representation, as lead counsel, in *In re Hi-Crush Partners L.P. Securities Litigation*, alleging that fracking sand producer Hi-Crush Partners misled shareholders prior to its initial public offering. This case resulted in a $3.8 million settlement while class certification was pending;
- Representation of a nationwide class of residential mortgage loan borrowers in *Rothstein v. GMAC Mortgage LLC*, a class action alleging violations of the Racketeer Influence and Corrupt Organizations Act. This litigation resulted in a $13 million settlement against GMAC Mortgage; and
- Representation of whistleblowers who claim that their companies have violated federal law or defrauded the United States Government.

Mr. Elrod is admitted to the New York State Bar, the New Jersey State Bar, the U.S. District Courts for the Southern and Eastern Districts of New York, the U.S. District Court for the District of New Jersey, and the U.S. Courts of Appeals for the 2nd and 9th Circuits. He graduated from the University of Chicago (B.A., 2005) and from the Boston University School of Law (J.D., 2009).



Randall M. Fox is a partner in our New York office, focusing on whistleblower matters. Mr. Fox joined the firm after serving as the founding Bureau Chief of New York Attorney General's Taxpayer Protection Bureau, where he handled claims that the government was defrauded, including whistleblowers' *qui tam* actions. Before his promotion to Bureau Chief, Mr. Fox was a Special Assistant Attorney General in the New York Attorney General's Medicaid Fraud Control Unit, where he handled cases involving healthcare fraud.

Mr. Fox frequently speaks and writes about *qui tam* cases and other whistleblower issues.

Mr. Fox's practice covers a wide range of whistleblower matters under False Claims Acts and in the IRS and SEC whistleblower programs. He is pursuing numerous cases under the unique New York False Claims Act, which provides incentives to whistleblowers to report on large tax frauds. His cases have included the following:

- False Claims Act cases against medical providers who falsely marketed their products, paid kickbacks to physicians and patients, and provided services that were not medically necessary;
- False Claims Act cases against government contractors who failed to deliver products and services to the government as promised;
- IRS whistleblower and New York False Claims Act matters concerning financial organizations and other businesses that knowingly violated their tax obligations;
- SEC whistleblower claims that financial entities violated securities laws and harmed investors;
- A whistleblower case against a large banking organization that kept for itself millions of dollars in interest on unclaimed properties that it was required to turn over to the State;
- Leading the New York Attorney General's Office's $400 million False Claims Act case against Sprint for knowingly failing to pay sales taxes on its monthly cell phone charges;
- Leading the New York Attorney General's Office's False Claims Act case against pharmaceutical giant Merck for falsely marketing its pain drug Vioxx, which resulted in a $980 million nationwide settlement, with over $60 million going to New York.

Before joining the New York Attorney General's Office, Mr. Fox was a partner at LeBoeuf, Lamb, Greene & MacRae, LLP, where his practice focused on class actions, commercial disputes, and securities and consumer fraud actions. Mr. Fox is admitted to the New York State Bar, the U.S. District Courts for the Southern, Eastern and Northern Districts of New York, the U.S. Court of Appeals for the Second, Third, Eighth and Ninth Circuits, and the U.S. Tax Court. He graduated from Williams College (B.A., 1988), and New York University School of Law (J.D. 1991).



Robert J. Gralewski, Jr. is a partner based in our California office. Mr. Gralewski focuses on antitrust and consumer litigation and has been involved in the fields of complex litigation and class actions for over 15 years. Throughout the course of his career, Mr. Gralewski has prosecuted a wide variety of federal and state court price-fixing, monopoly and unfair business practice actions against multinational companies, major corporations, large banks, and credit card companies.

Some of Mr. Gralewski's relevant work includes:

- Representation of businesses and consumers in indirect purchaser class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly. Mr. Gralewski was a member of the trial teams in the Minnesota and Iowa actions (the only two Microsoft class actions to go to trial) which both settled in plaintiffs' favor after months of hard-fought jury trials. The Microsoft cases in which Mr. Gralewski was involved in ultimately settled for more than $2 billion in the aggregate;

- Representation of businesses and consumers of thin-film transistor liquid crystal display (TFT-LCD) products who were harmed by an alleged price-fixing conspiracy among TFT-LCD manufacturers; and

- Representation of businesses and consumers in an indirect purchaser class action against various manufacturers of SRAM, alleging that defendants engaged in a conspiracy to fix prices in the SRAM market.

Mr. Gralewski is a member of the California State Bar and is admitted to practice in state and all federal courts in California as well as several federal courts throughout the country. He graduated from Princeton University (B.A., 1991) and *cum laude* from California Western School of Law (J.D., 1997).



Daniel Hume is a partner in our in our New York office and member of the firm's management committee. He joined the firm in 1995 and his practice focuses on securities and antitrust litigation. Mr. Hume routinely represents institutional investors and financial institutions in class action and direct securities litigation. Mr. Hume also has prosecuted antitrust class actions and obtained significant monetary relief for consumers.

Some of Mr. Hume's relevant securities work includes:

- Representation, as lead counsel, of the investor class in *In re AT&T Wireless Tracking Stock Securities Litigation*, a securities class action which resulted in recovery of $150 million for the class.

- Representation, as lead counsel, of a group of Singapore-based investors in a securities class action, *Dandong v. Pinnacle Performance Ltd*, against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. This litigation resulted in a $20 million recovery.

- Representation, as lead counsel, of the investor class in *In re MOL Global, Inc. Securities Litigation*, a securities class action lawsuit alleging that e-payment enabler MOL Global misled shareholders prior to its initial public offering. This litigation resulted in a $8.5 million recovery.

- Representation of foreign financial institutions in individual lawsuits against Morgan Stanley, Credit Agricole Corporate and Investment Bank, UBS, Deutsche Bank, Credit Suisse, Goldman Sachs, JP Morgan, and Barclays pertaining to a number of fraudulent structured investment vehicles and asset-backed collateralized debt obligations.

Some of Mr. Hume's relevant antitrust work includes:

- Representation, as a lead counsel, of consumer classes in connection with antitrust proceedings against Microsoft in the United States and Canada. So far, these litigations have resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial.

- Representation of a class of retailers in *In re Visa Check/Master Money Antitrust Litigation*, an antitrust case which resulted in a settlement of over $3 billion for the class.

- Representation as fiduciary for the interim exchange class counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* for a putative class of participants who traded futures and options in the FX market. The case has already resulted in a partial settlement of more than $2.3 billion.

Mr. Hume is admitted to the New York State Bar, the U.S. District Courts for the Southern and Eastern Districts of New York, the U.S. Court of Appeals for the Second, Third, Fourth, Fifth, Eighth and Ninth Circuits, and the U.S. Supreme Court. He graduated from the State University of New York at Albany *magna cum laude* (B.A. Philosophy, 1988) and from Columbia Law School, where he served as Notes Editor for the Columbia Journal of Environmental Law (J.D., 1991).



David E. Kovel is a partner based in our New York office and is a member of the firm's management committee. Mr. Kovel's practice focuses on whistleblower, antitrust, commodities, securities and corporate governance matters. Mr. Kovel joined the firm in 2004.

Recent cases in which Mr. Kovel has been involved include:

- *In re Libor-Based Financial Instruments Antitrust Litigation*. Court appointed co-liaison counsel for all class actions in the multi-district litigation and co-lead counsel for exchange-based class alleging the fixing of prices of a benchmark interest rate. Obtained a $20 million settlement with one of 16 defendants (the first settlement in the ongoing complex litigation). Remaining claims are pending;
- Representation, as counsel for lead plaintiff and other share holders in a derivative action brought against members of the Board of Directors and senior executives of Pfizer, Inc. for breach of fiduciary duty. Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters;
- Representation of purchasers of pharmaceutical drugs claiming to have been harmed by Branded manufacturers who fraudulently extended patent or other regulation monopolies;
- Representation, as lead counsel, of a class of New York State consumers in connection with antitrust proceedings against Microsoft;
- Representation, as lead counsel, of a class of gasoline purchasers in California in connection with Unocal, Inc.'s manipulation of the standard-setting process for gasoline. The litigation resulted in a $48 million recovery for the class;
- Representation, as lead counsel in *In re North Sea Brent Crude Oil Futures Litig* on behalf of a proposed class of traders alleging benchmark manipulation. This litigation is ongoing;
- Representation of propane purchasers who were harmed by BP America's manipulation of the physical propane market; and
- Representation of various whistleblowers who claim that their companies have defrauded the United States Government or other state and city governments.

Mr. Kovel also has an active pro bono practice, having represented, among others, clients in need of housing referred through the office of *pro se* litigation in the Southern District of New York, clients in foreclosure matters, and a Latino soccer association in its efforts organize and obtain a fair proportion of field time from a municipality.

Mr. Kovel is admitted to the New York State Bar, the U.S. District Courts for the Southern, Eastern, and Western Districts of New York, the U.S. Court of Appeals for the First Circuit, and the Connecticut State Bar. He is a member of the New York City Bar Association Committee on Futures and Derivatives Regulation, and is a former member of the New York City Bar Association Antitrust Committee. He graduated from Yale University (B.A.), Columbia University School of Law (J.D.) and Columbia University Graduate School of Business (M.B.A.). Mr. Kovel traded commodities for several years before attending law school. Prior to joining KM, Mr. Kovel practiced at Simpson Thacher & Bartlett LLP. He is fluent in Spanish.



Karen M. Lerner is a partner in our New York office focused on antitrust, commodities and healthcare litigation. Ms. Lerner joined the firm in 2015.

Some of Ms. Lerner's recent work includes:

- *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, 1:13-cv-07789-LGS (S.D.N.Y.). Representation as fiduciary for the interim exchange class counsel for a putative class of participants who traded futures and options in the FX market. The case has already resulted in partial settlements of more than $2.3 billion;

- *In re Libor-Based Financial Instruments Antitrust Litigation*, 1:11-md-02262-NRB (S.D.N.Y.). Representation of exchange-based investors of Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates. The case has already resulted in partial settlements of more than $150 million;

- *Sullivan et al. v. Barclays PLC et al.*, 1:13-cv-02811-PKC (S.D.N.Y.). Representation as a counsel in the benchmark rate antitrust litigation on behalf of a putative class of investors who traded futures and options contracts on the NYSE LIFFE exchange against global financial institutions responsible for the setting the Euro Interbank Offered Rate ("Euribor"). The case has already resulted in partial settlements of more than $300 million; and

- *In re Effexor XR Antitrust Litigation*, 3:11-cv-05479-PGS-LHG (D.N.J.). Court appointed Discovery Committee Co-Chair for a putative class of direct purchasers of brand name and generic equivalents of extended release venlafaxine hydrochloride capsules against drug manufacturers. Among the claims, Defendants are alleged to have delayed market entry of generic versions and entered into reverse payment settlements.

Prior to joining KM, Ms. Lerner was of counsel at McDonough, Korn & Eichhorn, where she handled cases involving professional liability defense, negligence, insurance coverage, and products liability. Ms. Lerner also advises individuals, corporations and non-profits regarding business practices and governance, and has served as a member of the Board of Directors for several charitable organizations. Ms. Lerner is admitted to the New York State Bar, New Jersey State Bar, U.S. Supreme Court, U.S. District Court for the Eastern District of New York, U.S. District Court for the District of New Jersey, U.S. Court of Appeals for the 3rd Circuit, and the U.S. District Court for the Southern District of New York. Ms. Lerner graduated from the University of Albany – SUNY (B.A. 1988, *summa cum laude, Phi Beta Kappa*), and the University of Pennsylvania School of Law (J.D. 1991).



Peter S. Linden is a partner in our New York office and is a member of the firm's management committee. Mr. Linden's practice concentrates on securities, shareholder derivative, commercial and healthcare fraud litigation. He joined the firm in 1990 and provides advisory services to government pension funds and other institutional investors as well as to corporate and individual consumers. He has been appointed a Special Assistant Attorney General for the State of Michigan and is a member of the National Association of Public Pension Plan Attorneys.

Mr. Linden has obtained numerous outstanding recoveries for investors and consumers during his career. His advocacy has also resulted in many notable decisions, including in *In re Matsushita Securities Litigation*, granting partial summary judgment under § 14(d)(7) of the Securities Exchange Act, and *In re Ebay Inc. Shareholders Litigation*, a shareholder derivative action, finding that investment banking advisors could be held liable for aiding and abetting insiders' acceptance of IPO allocations through "spinning".

Some of Mr. Linden's relevant experience includes:

- Representation, as lead counsel, of the lead plaintiff in *In re Citigroup Inc Securities Litigation*, a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation of the City of New York and 43 New York counties in federal Medicaid fraud actions. KM has settled or reached agreements in principle with all defendants in these matters. We have recovered over $225 million for the New York and Iowa Medicaid programs;

- Representation of the State of Michigan in a lawsuit filed in Michigan State Court against McKesson Corporation, Hearst Corporation, and First DataBank, a case arising out of the defendants' fraudulent scheme to increase the Average Wholesale Prices of hundreds of brand name drugs thereby causing false claims to be submitted to the Michigan Medicaid program. This case recently settled;

- Representation, as co-lead counsel, of an investor class and an institutional plaintiff in *In re BISYS Securities Litigation*, a class action arising out of alleged accounting improprieties and which resulted in a $65 million recovery for the class;

- Serving as Chairman of the Plaintiffs' Steering Committee in *In re MCI Non-Subscriber Litigation*, a consumer class action which resulted in an approximately $90 million recovery for the class; and

- In *Reynolds v. Beneficial National Bank,* Mr. Linden and KM successfully persuaded the 7th Circuit U.S. Court of Appeals and ultimately the district court to overturn a questionable settlement, and were then appointed co-lead counsel to the class. Mr. Linden and KM were lauded by the district judge for their "intelligence and hard work," and for obtaining "an excellent result for the class."

Mr. Linden is admitted to the New York State Bar, the U.S. Courts of Appeals for the Second, Third, Sixth, Seventh, Eighth, and Tenth Circuits, and the U.S. District Courts for the Eastern and Southern Districts of New York, the Eastern District of Michigan, and the District of Colorado. He graduated from the State University of New York at Stony Brook (B.A., 1980) and the Boston University School of Law (J.D., 1984).

Prior to joining KM, Mr. Linden worked as an assistant district attorney in the Kings County District Attorney's Office from 1984 through October, 1990 where he served as a supervising attorney of the Office's Economic Crimes Bureau.



Andrew M. McNeela is a partner in our New York office focusing on securities and structured finance litigation. Mr. McNeela joined the firm in 2008.

Some of Mr. McNeela's relevant work includes:

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million;

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- *Dandong v. Pinnacle Performance Limited*, a class action lawsuit pertaining to $154.7 million of credit linked notes backed by risky collateralized debt obligations which Morgan Stanley falsely marketed as a safe investment while actively shorting the same assets and betting against its clients. This case settled for $20 million;

- Representation, as lead counsel, in the securities class action *In Re Herley Industries Inc. Securities Litigation* on behalf of investors. This litigation resulted in a recovery of $10 million for the class; and

- Representation, as lead counsel, of investors in Goldman Sachs common stock in a securities class action case pertaining to Goldman's alleged instruction to their research analysts to favor procurement of investment banking deals over accuracy in their research. Disclosure caused Goldman Sachs' stock to decline materially. This litigation resulted in a recovery of $29 million for the class.

Immediately prior to joining KM, Mr. McNeela served as an Assistant U.S. Attorney in the Civil Division of the U.S. Attorney's Office for the Southern District of New York. In this capacity, he represented the U.S. in a wide array of civil litigation. Mr. McNeela has argued over twenty cases before the U.S. Court of Appeals for the Second Circuit. In 2013, he was named one of the top attorneys under 40 by Law360's Rising Stars.

Mr. McNeela is admitted to the New York State Bar, the U.S. Court of Appeals for the Second Circuit, and the U.S. District Courts for the Southern and Eastern Districts of New York. He is a member of the New York American Inn of Court. He graduated from Washington University (B.A., 1995) and from Hofstra University School of Law (J.D., 1998, *cum laude*), where he was a member of the Law Review.



Ira M. Press is a partner in our New York office and is a member of the firm's management committee. Mr. Press's practice focuses on securities and consumer litigation. He joined the firm in 1993, and currently leads the firm's institutional investor monitoring program. In this capacity, he has provided advisory services to numerous government pension funds and other institutional investors. He has authored articles on securities law topics and has lectured to audiences of attorneys, experts and institutional investor fiduciaries.

Mr. Press' advocacy has resulted in several landmark appellate decisions, including *Rothman v. Gregor*, the first ever appellate reversal of a lower court's dismissal of a securities class action suit pursuant to the 1995 Private Securities Litigation Reform Act.

Some of Mr. Press' relevant experience includes:

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million;

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million; and

- Representation, as lead counsel, of investors in Goldman Sachs common stock in a securities class action case pertaining to Goldman's alleged instruction to their research analysts to favor procurement of investment banking deals over accuracy in their research. Disclosure caused Goldman Sachs' stock to decline materially. This case resulted in a $29 million recovery for the class.

Mr. Press is admitted to the New York State Bar, the U.S. Courts of Appeals for the Second, Third, Fourth, Fifth, Sixth, Eighth, Ninth, and Tenth Circuits, and the U.S. District Courts for the Eastern and Southern Districts of New York. He graduated from Yeshiva University *magna cum laude* (B.A., 1986) and from New York University Law School (J.D., 1989).



Mark A. Strauss is a partner in our New York office. He represents whistleblowers in qui tam cases under the False Claims Act, defrauded investors, bilked consumers and other victims of corporate and financial wrongdoing in class actions and arbitrations throughout the country. Mr. Strauss has experience litigating under the Racketeer Influenced and Corrupt Organizations Act (RICO), and the securities, antitrust and consumer protection laws. His practice also includes litigating FINRA securities arbitrations against large firms on Wall Street. Cases litigated by Mr. Strauss have resulted in recoveries for aggrieved plaintiffs totaling hundreds of millions of dollars.

Some of Mr. Strauss's relevant work includes:

- *United States Ex rel Dickhudt v. Winds Enters*. (W.D. Wash.). Representation of a whistleblower in qui tam case against Chinese apparel manufacturer for evasion of U.S. import duties through use of false customs declarations and phony invoices. Client received award of 20% of $1.5 million settlement recovered for taxpayers;

- *United States ex rel Karlin v. Noble Jewelry Co*. (S.D.N.Y.). Representation of a whistleblower in qui tam action against Chinese manufacturer for misclassification of goods under U.S. Harmonized Tariff Schedule (the HTSA) and underpayment of import duties. Client received award of 19% of $3.85 million settlement recovered for taxpayers;

- *Rothstein v. GMAC Mortg.* (Bankr. S.D.N.Y). Representation, as Class Counsel, of residential mortgage borrowers in class action for violations of RICO in connection with kickback scheme that resulted in overcharges for force-placed insurance. Case resulted in $13 million settlement.

- *Parker v. AHMSI Ins. Agency* (S.D. Fla.). Representation, as Lead Counsel, of mortgage borrowers in class action for violations of RICO in connection with undisclosed rebate scheme and overcharges for lender-placed insurance;

- *In re Citigroup Inc. Securities Litig.* (S.D.N.Y.). Representation, as Co-Lead Counsel, of investors in securities class action relating to bank's exposure to Collateralized Debt Obligations (CDOs) containing toxic mortgage-backed securities. Case resulted in $590 million settlement; and

- *In re Adelphia Commc'n Corp. Securities Litig*. (S.D.N.Y.). Representation, as Co-Lead Counsel, of shareholders in securities class action involving improper self-dealing by corporate insiders and billions of dollars in undisclosed liabilities. Case resulted in $478 million in settlements.

Mr. Strauss is admitted to the New York State Bar, the California State Bar, and the U.S. District Courts for the Eastern and Southern Districts of New York, and the Northern, Eastern, Southern and Central Districts of California. He graduated from Cornell University (B.A., 1987) and from Fordham University School of Law, where he was Associate Editor of the Law Review (J.D., 1993).

Prior to joining Kirby McInerney, Mr. Strauss practiced at Christy & Viener, LLP and Cahill Gordon & Reindel LLP where he focused on complex commercial litigation.



Christopher S. Studebaker is a partner in our New York office focusing on antitrust, structured finance, and securities litigation. Mr. Studebaker joined the firm in 2007.

Recent cases on which Mr. Studebaker has worked include:

- Representation of a foreign financial institution in an action against a U.S. bank concerning a $30 million structured product. A confidential settlement was reached following the court's denial of defendants' motion to dismiss;

- Representation of a foreign bank in a $70 million commercial dispute against a U.S. bank. A confidential settlement was reached following the court's denial of defendants' motion to dismiss;

- Representation, as lead counsel, of a group of Singapore-based investors in structured products against a major financial institution. The litigation resulted in a recovery of $20 million;

- Representation of a direct purchaser class against a medical manufacturer for monopolization of the hypodermic syringe market. The litigation resulted in a recovery of $40 million; and

- Representation of the State of Michigan against drug wholesaler and publishers of pharmaceutical data for False Claims Act violations. A favorable settlement was reached.

Before joining KM, Mr. Studebaker was an associate with an antitrust and consumer protection litigation boutique. He also served at the U.S. Department of Commerce where he advised senior officials on U.S. trade policy and represented the U.S. in trade negotiations and before the World Trade Organization. Before law school, Mr. Studebaker worked for the Government of Japan and studied in Japan.

Public Speaking/Publications include:

Co-author (in Japanese), "Current Status of Subprime-Related Litigation and Implications for Japan," Kinzai Jijyou Shukan-shi, (June 3, 2013);

Speaker (in Japanese), "Securities Litigation as Part of Risk Management," 2013 Japan Institutional Investment Forum; and

Guest Lecturer (in Japanese), "Class Action Procedures in the United States: Recent Trends and Future Prospects," Nihon University School of Law (July 2016).

Mr. Studebaker is admitted to the New York State Bar, the Washington State Bar, the U.S. District Court for the Southern District of New York, and the U.S. Court of Appeals for the Second Circuit. He is a member of the Asian American Bar Association of New York. Mr. Studebaker graduated from Georgetown University (B.S.F.S., 1997, *cum laude*), Waseda University (M.A., 2001), and University of Kansas (J.D., 2004), where he was Managing Editor of the Journal of Law & Public Policy. He is fluent in Japanese.



Meghan Summers is a partner based in our New York office focusing on securities, structured finance, and antitrust litigation. Ms. Summers previously worked at the firm as a paralegal and law clerk before joining the firm in September 2012 as an associate.

Ms. Summers has recently worked on the following cases:

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor Rates;
- Representation as fiduciary for the interim exchange class counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* for a putative class of participants who traded futures and options in the FX market. The case has already resulted in a partial settlement of more than $2 billion;
- *Dandong v. Pinnacle Performance Limited*, a class action lawsuit pertaining to $154.7 million of credit linked notes backed by risky collateralized debt obligations which Morgan Stanley falsely marketed as a safe investment while actively shorting the same assets and betting against its clients. This case settled for $20 million;
- An individual lawsuit pertaining to fraudulent collateralized debt obligations. Morgan Stanley represented that independent collateral managers would select safe collateral for inclusion in the underlying portfolios. In reality, Morgan Stanley controlled portfolio selection and chose high-risk collateral while simultaneously shorting such collateral, thus benefitting at its client's expense;
- Individual lawsuits against Morgan Stanley, Credit Agricole Corporate and Investment Bank, UBS, Deutsche Bank, Credit Suisse, Goldman Sachs, JP Morgan, and Barclays pertaining to a number of fraudulent structured investment vehicles and asset-backed collateralized debt obligations;
- An individual securities fraud action against BP plc related to the Deepwater Horizon explosion on April 20, 2010, and the subsequent drop in BP's share price; and
- *In re MOL Global Inc. Securities Litigation*, a class action lawsuit alleging that e-payment enabler MOL Global misled shareholders prior to its initial public offering. This case settled for $8.5 million.

As a law clerk, Ms. Summers worked on a variety of matters including *In re Citigroup Inc. Securities Litigation, In re Wachovia Corporation,* and private antitrust proceedings against Microsoft in the United States and Canada.

Ms. Summers is admitted to the New York State Bar, the U.S. District Courts for the Southern and Eastern Districts of New York, the U.S. District Court for the District of Colorado, and the U.S. Court of Appeals for the 2nd and 3rd Circuits. She is a member of the American Bar Association. Ms. Summers graduated from Cornell University *summa cum laude* where she was ranked first in her major (B.S., 2008) and from Pace University School of Law *summa cum laude* where she was Salutatorian of her class (J.D., 2012).



Randall K. Berger is of counsel to the firm and practices out of our New York office. He joined the firm in 1994. Mr. Berger focuses on commercial arbitration, antitrust, whistleblower and unclaimed property litigation. In whistleblower cases, fraud against Federal and State governments is exposed by persons having unique knowledge of the circumstances surrounding the fraud. The whistleblowers are often compensated from any recovery and the cases are generally litigated under seal.

Mr. Berger is a certified arbitrator for FINRA (the Financial Industry Regulatory Authority). The arbitration panels where Mr. Berger serves are used to resolve disputes between investors and broker dealers or registered representatives, and to resolve intra-industry conflicts.

Some of Mr. Berger's relevant work includes:

- Representation of municipal issuers of Auction Rate Securities in FINRA arbitrations against underwriters alleging misrepresentation and breach of fiduciary duty;
- Representation of State Treasurers in litigation against the Federal government to recover unclaimed U.S. savings bond proceeds;
- Antitrust litigation against the 27 largest investment banks in the United States in connection with alleged price fixing in the market for the underwriting of initial public stock offerings; and
- Representation, as co-lead counsel, of investors in Ponzi scheme instruments issued by the now-bankrupt Bennett Funding Group in a class action which resulted in a recovery of $169.5 million for the class.

Mr. Berger is admitted to the New York State Bar, the U.S. District Courts for the Southern, Eastern and Northern Districts of New York and the District of Colorado. He graduated from Iowa State University (B.S., 1985) and from the University of Chicago (J.D., 1992).

Prior to attending law school and joining KM, Mr. Berger was an associate with the law firm Winston & Strawn, and before that, a consultant with the Management Information Consulting Division of Arthur Andersen & Co.



Will Harris is of counsel to the firm. He focuses on antitrust and consumer litigation.

Some of Mr. Harris's relevant work includes:

- Representation of direct purchasers in a class action against the manufacturers of drywall in *In re Domestic Drywall Antitrust Litigation*. The defendants allegedly unlawfully conspired to artificially inflate the prices of drywall in the U.S.;
- Representation of businesses and consumers of thin-film transistor liquid crystal display (TFT-LCD) products who were harmed by an alleged price-fixing conspiracy among TFT-LCD manufacturers; and
- Representation of businesses and consumers in an indirect purchaser class action against various manufacturers of SRAM, alleging that defendants engaged in a conspiracy to fix prices in the SRAM market.

Mr. Harris is admitted to the New York State Bar and the U.S. District Court for the Southern District of New York. He graduated from The College of William & Mary (B.A. 2001) and Washington and Lee University School of Law (J.D. 2005).

Prior to joining KM, Mr. Harris was an associate with the law firm Gergosian & Gralewski, and before that, he worked as a contract attorney with KM in connection with the firm's Microsoft litigation, which ultimately settled for more than $2 billion in the aggregate.



Karina Kosharskyy is of counsel to the firm. She is based in our New York office focusing on antitrust and securities litigation. Ms. Kosharskyy joined the firm in 2005.

Recent cases on which Ms. Kosharskyy has worked include:

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm;

- Representation as fiduciary for the interim exchange class counsel *in In re Foreign Exchange Benchmark Rates (FX) Antitrust Litigation* for a putative class of participants who traded futures and options in the FX market. The case has already resulted in a partial settlement of more than $2 billion;

- Representation of a class of consumers in connection with *In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions.* This case involves Unocal's manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which increased retail prices of reformulated gasoline. The court recently approved a preliminary settlement of $48 million in this litigation; and

- Representation of consumer classes in connection with antitrust proceedings against Microsoft. These litigations resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial.

Ms. Kosharskyy is admitted to the New York State Bar, the U.S. District Courts for the Southern and Eastern Districts of New York, the U.S. District Court for the District of New Jersey, and the New Jersey State Bar. She graduated from Boston University (B.A., 2000) and from New York Law School (J.D., 2007). She is fluent in Russian.

John Low-Beer is of counsel to the firm and focuses on whistleblower litigation. Mr. Low-Beer formerly was Assistant Corporation Counsel, Affirmative Litigation with the NYC Law Department (1987-2000, 2003-2013), and was the lead attorney on complex and highly publicized matters, including:

- Suit against BNY Mellon concerning FX trading for City pension funds;
- Litigation concerning City taxation of consular and U.N. mission staff housing;
- Successful challenge to New York State's misallocation of $750 million in federal stimulus funding;
- Suit forcing Governor to implement State takeover of $2.5 billion in City debt; and
- Suits against more than 40 pharmaceutical companies recovering $240 million (with Kirby McInerney).

In addition, Mr. Low-Beer has a robust pro bono and low bono practice, representing plaintiffs in immigration, urban land use, guardianship, and whistleblower cases. Recent wins include *Avella v. City of New York*, 131 A.D.3d 77 (1st Dept. 2015), which invalidated a plan to build a shopping mall on parkland in Queens, and *Matter of Daniel B.*, 22 N.Y.S.3d 553 (2d Dept. 2015), which upheld a judgment in a guardianship/turnover proceeding.

Prior to joining the NYC Law Department, Mr. Low-Beer was law clerk to Hon. Leonard Garth, U.S. Court of Appeals for the Third Circuit, and Associate Professor at York College, CUNY, and Assistant Professor at Yale School of Management and Department of Sociology. He is the author of a book, *Protest and Participation* (Cambridge U.P. 1978) and a prize-winning note in the Yale L.J., "The Constitutional Imperative of Proportional Representation," among other publications.



Beverly Mirza is of counsel to the firm and focuses on antitrust and securities litigation. Ms. Mirza joined the firm in 2004.

Cases on which Ms. Mirza has worked include:

- Representation of a class of consumers in connection with *In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions.* This case involves Unocal's manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which increased retail prices of reformulated gasoline. This litigation resulted in a $48 million recovery for the class;

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates;

- Representation, as one of the firms with primary responsibility for the case, of a class of purchasers of computers containing Intel's microprocessor chips in *Coordination Proceedings Special Title, Intel x86 Microprocessor Cases*. This litigation is ongoing;

- Representation of a class of retailers in *In re Chocolate Confectionary Antitrust Litigation,* alleging price fixing claims against a group of chocolate manufacturers in the United States and abroad;

- Representation of a class of sellers in *In re Ebay Seller Antitrust Litigation*, alleging monopolization claims against Ebay;

- Representation of an objector to the settlement in *Reynolds v. Beneficial National Bank* in the United States Northern District Court for the District of Illinois. Ms. Mirza and KM were lauded by the presiding judge for their "intelligence and hard work," and for obtaining "an excellent result for the class."

Ms. Mirza is admitted to the California State Bar and the U.S. District Courts for the Northern and Central Districts of California. Her practice is supervised by members of the State Bar of New York. She graduated from California State University of Los Angeles *magna cum laude* (B.S., 2000) and from California Western School of Law (J.D., 2004).



Sawa Nagano is of counsel to the firm. She focuses on the representation of clients in relation to price-fixing litigation under the Sherman Antitrust Act and other federal and state laws to recover overcharges caused by international price-fixing cartels. Ms. Nagano joined the firm in 2013.

Recent cases on which Ms. Nagano has worked include:

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm.

Prior to joining KM, Ms. Nagano worked with the law firms of both Orrick, Herrington, and Sutcliffe LLP and Crowell and Morning LLP, where she assisted in the investigation of conspiracies to engage in price-fixing and anticompetitive practices by manufacturers and multinational conglomerates, and she represented cable operators on matters arising before the Federal Communications Commission as well as in their relations with local and state franchising authorities. She also worked for the New York bureau of a major Japanese television network. Additionally, she interned with the Office of Commissioner Furchtgott-Roth at the Federal Communications Commission and worked as a student counsel at the Art, Sports and Entertainment Law Clinic of the Dickinson School of Law of the Pennsylvania State University.

Ms. Nagano is admitted to the New York State Bar, the New Jersey State Bar, the Bar of the District of Columbia, and the U.S. District Courts for the Southern District of New York and the District of New Jersey. She graduated from Sophia University in Tokyo, Japan (B.A., 1989), New York University (M.A., 1992), and The Dickinson School of Law of the Pennsylvania State University (J.D., 2000). She is fluent in Japanese.



Henry Telias is of counsel to the firm and practices out of our New York office, focusing on accountants' liability and securities litigation. Mr. Telias joined the firm in 1997.

In addition to his legal work, Mr. Telias is the firm's chief forensic accountant. He holds the CFF credential (Certified in Financial Forensics) and the PFS credential (Personal Financial Specialist) from the American Institute of Certified Public Accountants. Mr. Telias received his CPA license from New York State in 1982. Prior to practicing as an attorney, he practiced exclusively as a certified public accountant from 1982 to 1989, including 3 years in the audit and tax departments of Deloitte Haskins & Sells' New York office.

Some of Mr. Telias' relevant experience includes:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million; and

- Representation, as lead counsel, of a certified class of purchasers of PRIDES securities in connection with the Cendant Corporation accounting fraud in *In re Cendant Corporation PRIDES Litigation.* This litigation resulted in an approximate $350 million settlement for the certified class – an unprecedented 100 percent recovery.

Mr. Telias is admitted to the New York State Bar and the U.S. District Court for the Southern District of New York. He graduated from Brooklyn College *cum laude* (B.S., 1980) and from Hofstra University School of Law (J.D., 1989).



Edward M. Varga, III is of counsel to the firm and practices out of our New York office. He focuses on securities and antitrust litigation. Mr. Varga joined the firm in 2006.

Recent cases on which Mr. Varga has worked include:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation, as counsel for lead plaintiff and other shareholders, in a derivative action brought against members of the Board of Directors and senior executives of Pfizer, Inc. Plaintiffs made a breach of fiduciary duty claim because defendants allegedly allowed unlawful promotion of drugs to continue even after receiving numerous "red flags" that the improper drug marketing was systemic. Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters;

- *Dandong v. Pinnacle Performance Limited*, a class action lawsuit pertaining to $154.7 million of credit linked notes backed by risky collateralized debt obligations which Morgan Stanley falsely marketed as a safe investment while actively shorting the same assets and betting against its clients. This case settled for $20 million;

- Representation of companies that offered IPO securities in antitrust litigation against the 27 largest investment banks in the United States. Plaintiffs allege that the banks conspired to price fix underwriting fees in the mid-sized IPO market; and

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case settled for $168 million.

Mr. Varga is admitted to the New York State Bar, the U.S. District Court for the Southern District of New York, and the U.S. Court of Appeals for the Second Circuit. He graduated from Cornell University (B.S., 2000)) and from New York University Law School (J.D., 2006).



Elizabeth A. Brehm is an associate who concentrates on antitrust and securities litigation. Ms. Brehm joined the firm in 2011. Prior to her time at KM, Ms. Brehm practiced as an attorney in the New York office of Winston & Strawn LLP.

Recent cases on which Ms. Brehm has worked include:

- Representation of indirect purchasers in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, a price fixing anti-trust case wherein it is alleged that defendant entities conspired to control prices of television and monitor components;

- Representation, as lead counsel, of consumer classes in connection with antitrust proceedings against Microsoft in the United States and Canada. So far, these litigations have resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial;

- *In re Ductile Iron Pipe Fittings Antitrust Litigation*, MDL No. 2347 (D. NJ. 2012). Co-lead counsel on behalf of a proposed class of purchasers of iron pipe fittings for water projects. Class representatives include Wayne County, Michigan; and

- An individual lawsuit pertaining to fraudulent collateralized debt obligations. Morgan Stanley represented that independent collateral managers would select safe collateral for inclusion in the underlying portfolios. In reality, Morgan Stanley controlled portfolio selection and chose high-risk collateral while simultaneously shorting such collateral, thus benefitting at its client's expense.

During her time at Winston & Strawn, Ms. Brehm focused on products liability litigation, including *Estate of Bobby Hill v. U.S. Smokeless Tobacco Co.*, a wrongful death products liability lawsuit brought by the family of Bobby Hill against Altria Group, which had recently acquired U.S. Smokeless Tobacco Co. The lawsuit asserted that U.S. Smokeless Tobacco manufactured and sold smokeless tobacco that Bobby Hill began using when he was 13-years-old and that this led to the death of Mr. Hill at age 42 from tongue cancer. The case settled prior to trial.

Ms. Brehm is admitted to the New York State Bar. She graduated from Boston University (B.A., 2001), Long Island University (M.S. Edu., 2004), and from Hofstra School of Law *magna cum laude* (J.D., 2008).



Fatima Brizuela is an associate based in our California office who concentrates on antitrust matters. Ms. Brizuela joined the firm in 2015.

Currently, Ms. Brizuela works on the following cases:

- Representation of businesses and consumers in indirect purchase class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly; and

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm.

In addition, Ms. Brizuela assists senior attorneys with drafting briefs and motions, legal memoranda and research on various securities and antitrust litigation.

Ms. Brizuela graduated from Rutgers University (B.A. *summa cum laude* 2009) and California Western School of Law (J.D. 2015). She is admitted to the New York State Bar and is a member of the San Diego County Bar Association.



Angela M. Farren Angela M. Farren is an associate based in our New York office focusing on securities and antitrust litigation. Prior to joining Kirby McInerney, Ms. Farren interned for the Massachusetts Securities Division and U.S. Securities and Exchange Commission where she focused on regulatory and enforcement matters.

Ms. Farren's recent work includes:

- Representation of exchange-based investors, alleging monopolization and manipulation of the silver futures market in violation of federal antitrust and commodity exchange laws;

- Representation in an individual securities fraud action against BP plc arising out of the 2010 Deepwater Horizon explosion and subsequent Gulf of Mexico oil spill; and

- Representation in an individual lawsuit against Citibank, JPMorgan, Goldman Sachs and Barclays, alleging collusion and manipulation of the airline municipal bond market in violation of the Donnelly Act.

In addition, Ms. Farren assists senior attorneys with drafting briefs and motions, legal memoranda and research on various securities and antitrust litigation matters.

Ms. Farren is admitted to the New York State Bar. She graduated from Lehigh University (B.A. *high* honors 2013) and Boston University School of Law (J.D. 2017).



Emily C. Finestone is an associate based in our New York office who concentrates on antitrust and whistleblower/qui tam litigation.

She began her legal career at Kirby McInerney and rejoined the firm in 2019. Prior to returning to the firm, Ms. Finestone worked on complex commercial litigation matters at Shepherd, Finkelman, Miller & Shah LLP and later at LeClairRyan PLLC, where she assisted with whistleblower cases, consumer class actions, antitrust litigation, and ERISA suits in federal courts nationwide.

Ms. Finestone is admitted to the New York, Massachusetts, and Pennsylvania State Bars. She graduated from the University of Virginia (B.A. 2012) and Boston University School of Law (J.D. 2015). Publications include *SAC's Insider Trading*, 33 Rev. Banking & Fin.L. 11(2013); *Eliminating the Tax on Embezzled Funds: A Call for Reform* 34 Rev. Banking & Fin. L. 713 (2015).

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Anthony E. Maneiro is an associate based in our New York office who concentrates on securities, commodities and antitrust matters. Mr. Maneiro joined the firm in 2016.

Currently, Mr. Maneiro is assisting on the following cases:

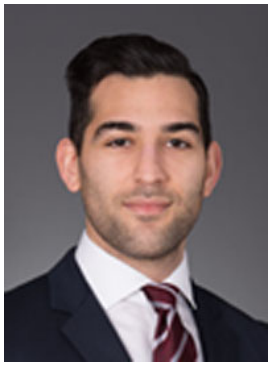
- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates;

- Representation of exchange-based investors in U.S. treasury futures and options, alleging that defendants colluded to manipulate the price of Treasury Securities prior to Treasury Auctions; and

- Representation of exchange-based investors, alleging price manipulation of physical natural gas as well as price manipulation of natural gas futures and other derivative natural gas contracts.

In addition, Mr. Maneiro assists senior attorneys with drafting briefs and motions, legal memoranda and research.

Mr. Maneiro is admitted to the New York State Bar, the Massachusetts State Bar, the U.S. District Court for the District of Massachusetts, and the United States District Court for the Eastern and Southern Districts of New York. He graduated from Grove City College (B.A. 2010, *magna cum laude*), London School of Economics and Political Science (MSc 2011) and Boston University School of Law (J.D., LL.M. 2016).



Seth M. Shapiro is an associate based in our New York office who concentrates on commodities, antitrust, whistleblower, securities, and consumer fraud matters. Mr. Shapiro joined the firm in 2016. Prior to joining KM, he practiced commercial litigation and worked as a compliance officer in securities sales and trading at Credit Suisse.

Mr. Shapiro's recent work includes:

- *Joel Packer, et al., v. Peabody Energy Corp., et al. (In re Peabody Energy Corp.)*, representation of certain noteholders, resulting in settlement just one month after filing the complaint, alleging breach of contract and fiduciary duties under contract and bankruptcy law for disparate treatment of noteholders in bankruptcy;

- *State of New York, ex rel., Aniruddha Banerjee, et ano, v. Moody's Corp., et al.*, representation of whistleblower alleging millions of dollars of tax evasion for over a decade through use of a sham captive insurance company;

- *State of New York, ex rel., Vinod Khurana, et al., v. Spherion Corp*, representation of whistleblower alleging a quality management company's liability in the largest known fraud against New York City and State, amounting to almost $1 billion;

- *Rudman Capital Mgmt. LLC, et al., v. Cavataio*, representation of hedge fund and the trustee of its pension trust for conversion and unjust enrichment; and

- *Hall, et al. v. Nassau County, et al.*, representation of Nassau County homeowners against Nassau County and certain administrative agencies for civil rights violations arising from the implementation of a racially discriminatory and irrational property tax system.

In addition, Mr. Shapiro assists partners with drafting briefs, pleadings, motions, legal memoranda, and discovery papers based on his legal research. He graduated from Brandeis University (B.A. 2009), and Fordham University School of Law (J.D. 2014), where he was Senior Articles Editor for the *Fordham Journal of Corporate & Financial Law.* Mr. Shapiro is fluent in Spanish.



Parul Sharma is a staff attorney based in our New York office who concentrates on antitrust matters. Ms. Sharma joined the firm in 2016.

Currently, Ms. Sharma works on the following cases:

- Representation of businesses and consumers in indirect purchase class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly; and

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates.

In addition, Mr. Sharma assists senior attorneys with drafting pleadings and motions, legal memoranda and research.

Ms. Sharma graduated from the University of Ottawa Telfer School of Management (Honors Bachelor of Commerce 2008) and Seton Hall University School of Law (J.D. 2014). She is admitted to the New York State Bar.

Prior to joining KM, Ms. Sharma was an associate at Jaffe & Asher in their Creditors Rights practice.



Andrew Watt is a staff attorney based in our New York office focusing on securities and antitrust litigation. Mr. Watt worked at the firm as an associate from 2005 through 2008. He then returned to work with the firm as a staff attorney in 2010.

Recent cases on which Mr. Watt has worked include:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation, as co-lead counsel, of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates; and

- Representation of a class of direct purchasers of Prograf, a branded prescription immunosuppressant used in organ transplant patients in an antitrust action against Astellas Pharma US, Inc. Plaintiffs allege that defendant filed a baseless citizen petition with the Food and Drug Administration ("FDA"), with the sole intent of foreclosing market entry by generic competitors, that improperly extended its monopoly and kept Prograf prices at supra-competitive levels.

Mr. Watt is admitted to the New York State Bar and the U.S. District Courts for the Southern and Eastern Districts of New York. He graduated from Columbia College (B.A., 1994), Yale University (M.A., 1999), and Columbia University School of Law (J.D., 2002), where he was a Harlan Fiske Stone Scholar.

Prior to joining KM, Mr. Watt practiced at Roberts & Holland, LLP.

Client & Adversary Recognition

KM received the highest available commendations from the City of NY four years in a row for its work on the AWP Litigation. In each of those four years, KM's efforts on the City's behalf received the overall rating of "excellent". The City elaborated, "*Kirby did a truly excellent job and the results reflect that*".

"The case has been in front of the Supreme Court of the United States once, and in front of the Ninth Circuit no fewer than three times. Throughout, [KM] has . . . brought a considerable degree of success . . . and thwarted attempts by other counsel who sought to settle . . . and destroy a potential billion dollars of class rights."

Plaintiff / client,
Epstein v. MCA, Inc.

"[The KM firm] proved to be a highly able and articulate advocate. Single-handedly, [KM] was able to demonstrate not only that [KM's] client had a good case but that many of the suspicions and objections held by the Nigerian Government were ill-founded."

English adversary in The Nigerian Cement Scandal

"[KM] represented us diligently and successfully. Throughout [KM's] representation of our firm, [KM's] commitment and attention to client concerns were unimpeachable."

European institutional defendant /client
involved in a multi-million dollar NASD arbitration

"Against long odds, [KM] was able to obtain a jury verdict against one of the larger, more prestigious New York law firms."

Plaintiff / client,
Vladimir v. U.S. Banknote Corporation

"[KM] represented our investors with probity, skill, and diligence. There is too much money involved in these situations to leave selection of class counsel to strangers or even to other institutions whose interests may not coincide."

Plaintiff / institutional client,
In re Cendant Corporation PRIDES Litigation

Notables

The firm has repeatedly demonstrated its ability in the field of class litigation and our success has been widely recognized. For example:

Rothstein v. GMAC Mortgage LLC, No. 12-cv-3412 (S.D.N.Y.). Lead counsel. $13 million settlement against GMAC Mortgage LLC in *In re Residential Capital, LLC, et al*., No. 12-12020 (Bankr. S.D.N.Y. 2016).

Globis Capital Partners, L.P., et al. v. The Cash Store Financial Services Inc., et al., No. 13-cv-3385 (S.D.N.Y. 2015): Co-lead counsel. CAD $13,779,167 cash settlement, representing roughly 50% of total class-wide stock losses.

Dandong v. Pinnacle Performance Ltd., No. 10-cv-08086 (S.D.N.Y. 2015). Lead counsel. $20 million settlement.

In re Hi-Crush Partners L.P. Securities Litigation, No. 12-cv-8557 (S.D.N.Y. 2015). Lead counsel. $3.8 million settlement while class certification was pending.

In re Citigroup Inc. Securities Litigation, No. 07-cv-9901 (S.D.N.Y. 2013). Lead counsel. $590 million settlement.

Barfuss v. DGSE Companies, Inc., No. 12-cv-3664 (N.D. Tex. 2013). Lead Counsel. $1.7 million settlement.

In re National City Corporation Securities, Derivative & ERISA Litigation, No. 08-cv-70004 (N.D. Ohio 2012). Lead counsel. $168 million settlement.

In re Wachovia Equity Securities Litigation, No. 08-cv-6171 (S.D.N.Y. 2012). Lead counsel. $75 million settlement.

In re BP Propane Indirect Purchaser Antitrust Litigation, No. 06-cv-3541 (N.D.Ill. 2010). Co-lead counsel. $15 million settlement on behalf of propane purchasers.

In re J.P. Morgan Chase Cash Balance Litigation, No. 06-cv-732 (S.D.N.Y. 2010). Co-lead counsel.

> "Plaintiff's counsel operated with a strong, genuine belief that they were litigating on behalf of a group of employees who had been injured and who needed representation and a voice, and, at great expense to [themselves], made Herculean efforts on behalf of the class over years…they're to be commended for their fight on behalf of people that they believed had been victimized."

In re Pfizer Inc. Shareholder Derivative Litigation, No. 09-cv-7822 (S.D.N.Y.). Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters.

In re Pharmaceutical Industry Average Wholesale Price Litigation, MDL No. 1456; *City of New York, et al. v. Abbott Laboratories, et al.*, No. 01 Civ. 12257 (D. Mass). KM represented the State of Iowa, the City of New York, and forty-two New York State counties in a lawsuit against forty defendant drug manufacturers asserting that they manipulated their average wholesale price data to inflate prices charged to government drug benefits payers. Recovery of over $225 million for the plaintiffs.

In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions, No. 05-cv-01671 (C.D. Cal). Lead counsel. $48 million settlement for indirect purchasers.

In re BISYS Securities Litigation, No. 04-cv-3840 (S.D.N.Y. 2007). Co-lead counsel. $66 million settlement.

> "In this Court's experience, relatively few cases have involved as high level of risk, as extensive discovery, and, most importantly, as positive a final result for the class members as that obtained in this case."

Cox v. Microsoft Corporation, Index No. 105193/00, Part 3 (N.Y. Sup. Ct.). Lead counsel. $350 million settlement.

In re AT&T Corp. Securities Litigation, No. 00-cv-8754 (S.D.N.Y. 2006). Lead counsel. $150 million settlement.

In re Adelphia Communications, Inc. Securities Litigation, No. 04-cv-05759 (S.D.N.Y. 2006). Co-lead counsel. $478 million settlement.

> "[T]hat the settlements were obtained from defendants represented by 'formidable opposing counsel from some of the best defense firms in the country' also evidences the high quality of lead counsels' work."

Lapin v. Goldman Sachs & Co., No. 04-cv-2236 (S.D.N.Y.). Co-lead counsel. $29 million settlement.

Montoya v. Herley Industries, Inc., No. 06-cv-2596 (E.D. Pa). Lead counsel. $10 million settlement.

Carnegie v. Household International Inc., et al., No. 98-cv-2178 (N.D.Ill. 2006). Co-lead counsel. $39 million settlement.

> "Since counsel took over the representation of this case . . ., they have pursued this case, conducting discovery, hiring experts, preparing for trial, filing motions where necessary, opposing many motions, and representing the class with intelligence and hard work. They have obtained an excellent result for the class."

Dutton v. Harris Stratex Networks Inc. et al., No. 08-cv-00755 (D.Del). Lead counsel. $8.9 million settlement.

In re Isologen Inc. Securities Litigation, No. 05-cv-4983 (E.D. Pa.). Lead counsel. $4.4 million settlement.

In re Textron, Inc. Securities Litigation, No. 02-cv-0190 (D.R.I.). Co-lead counsel. $7 million settlement.

Argent Convertible Classic Arbitrage Fund, L.P. v. Amazon.com, Inc. et al., No. 01-cv-0640L (W.D. Wash. 2005). Lead counsel. $20 million settlement for class of convertible euro-denominated bond purchasers.

Muzinich & Co., Inc. et al. v. Raytheon Company et al., No. 01-cv-0284 (D. Idaho 2005). Co-lead counsel. $39 million settlement.

Gordon v. Microsoft Corporation, No. 00-cv-5994 (Minn. Dist. Ct., Henn. Cnty. 2004). Co-lead counsel. $175 million settlement following two months of trial.

In re Visa Check/MasterMoney Antitrust Litigation, No. 96-cv-5238 (E.D.N.Y. 2003). $3 billion monetary settlement and injunctive relief.

In re Florida Microsoft Antitrust Litigation, No. 99-cv-27340 (Fl. Cir. Ct. 11th Cir., Miami/Dade Cnty. 2003). Co-lead counsel. $200 million settlement of antitrust claims.

In re Churchill Securities, Inc. (SIPA Proceeding), No. 99 B 5346A (Bankr. S.D.N.Y. 2003). Lead counsel. Over $9 million recovery for 500+ victims of pyramid scheme perpetrated by defunct brokerage firm.

In re Laidlaw Bondholder Securities Litigation, No. 00-cv-2518-17 (D. S.C. 2002). Lead counsel. $42.8 million settlement.

Cromer Finance v. Berger et al. (*In re Manhattan Fund Securities Litigatio*n), No. 00-cv-2284 (S.D.N.Y. 2002). Co-lead counsel. $65 million settlement in total.

In re Boeing Securities Litigation, No. 97-cv-715 (W.D. Wash. 2001). $92.5 million settlement.

In re MCI Non-Subscriber Telephone Rates Litigation, MDL No. 1275 (S.D. Ill. 2001). Chairman of steering committee. $88 million settlement.

In re General Instrument Corp. Securities Litigation, No. 01-cv-1351 (E.D. Pa. 2001). Co-lead counsel. $48 million settlement.

In re Bergen Brunswig/Bergen Capital Trust Securities Litigation, 99-cv-1305 and 99-cv-1462 (C.D. Cal. 2001). Co-lead counsel. $42 million settlement.

Steiner v. Aurora Foods, No. 00-cv-602 (N.D. Cal. 2000). Co-lead counsel. $36 million settlement.

Gerber v. Computer Associates International, Inc., No. 91-cv-3610 (E.D.N.Y. 2000). Multi-million dollar jury verdict in securities class action.

Rothman v. Gregor, 220 F.3d 81 (2d Cir. 2000). Principal counsel of record in appeal that resulted in first ever appellate reversal of the dismissal of a securities fraud class action under the Securities Reform Act of 1995.

Bartold v. Glendale Federal Bank, 81 Cal.App.4th 816 (2000). Ruling on behalf of hundreds of thousands of California homeowners establishing banks' duties regarding title reconveyance.

In re Cendant Corporation PRIDES Litigation, 51 F. Supp. 2d 537, 542 (D. N.J. 1999). Lead counsel. $340 million settlement.

> "[R]esolution of this matter was greatly accelerated by the creative dynamism of counsel." * * * "We have seen the gifted execution of responsibilities by a lead counsel."

In re Waste Management, Inc. Securities Litigation, No. 97C 7709 (N.D. Ill. 1999). Co-lead counsel. $220 million settlement.

> "...[Y]ou have acted the way lawyers at their best ought to act. And I have had a lot of cases... in 15 years now as a judge and I cannot recall a significant case where I felt people were better represented than they are here... I would say this has been the best representation that I have seen."

In re Bennett Funding Group, Inc. Securities Litigation, No. 96-cv-2583 (S.D.N.Y. 1999). Co-lead counsel. $140 million settlement ($125 million recovered from Generali U.S. Branch, insurer of Ponzi scheme instruments issued by Bennett Funding Group; $14 million settlement with Mahoney Cohen, Bennett's auditor).

In re MedPartners Securities Litigation, No. 98-cv-06364 (Ala. June 1999). Co-lead counsel. $56 million settlement.

In re MTC Electronic Technologies Shareholder Litigation, No. 93-cv-0876 (E.D.N.Y. 1998). Co-lead counsel. Settlement in excess of $70 million.

Skouras v. Creditanstalt International Advisers, Inc., et al., NASD Arb., No. 96-05847 (1998). Following an approximately one month hearing, successfully defeated multi-million dollar claim against major European institution.

In re Woolworth Corp. Securities Class Action Litigation, No. 94-cv-2217 (S.D.N.Y. 1997). Co-lead counsel. $20 million settlement.

In re Archer Daniels Midland Inc. Securities Litigation, No. 95-cv-2877 (C.D. Ill. 1997). Co-lead counsel. $30 million settlement.

Vladimir v. U.S. Banknote Corp., No. 94-cv-0255 (S.D.N.Y. 1997). Multi-million dollar jury verdict in § 10(b) action.

In re Archer Daniels Midland Inc. Securities Litigation, No. 95-cv-2877 (C. D. Ill. 1997). Co-lead counsel. $30 million settlement.

Epstein et al. v. MCA, Inc., et al., 50 F.3d 644 (9th Cir. 1995), *rev'd and remanded on other grounds, Matsushita Electric Industrial Co., Ltd. et al. v. Epstein et al.*, No. 94-1809, 116 S. Ct. 873 (February 27, 1996). Lead counsel. Appeal resulted in landmark decision concerning liability of tender offeror under section 14(d)(7) of the Williams Act, SEC Rule 14d-10 and preclusive effect of a release in a state court proceeding. In its decision granting partial summary judgment to plaintiffs, the court of appeals for the Ninth Circuit stated:

> "The record shows that the performance of the Epstein plaintiffs and their counsel in pursuing this litigation has been exemplary."

In re Abbott Laboratories Shareholder Litigation, No. 92-cv-3869 (N.D. Ill. 1995). Co-lead counsel. $32.5 million settlement.

> "The record here amply demonstrates the superior quality of plaintiffs' counsel's preparation, work product, and general ability before the court."

In re Morrison Knudsen Securities Litigation, No. 94-cv-334 (D. Id. 1995). Co-lead counsel. $68 million settlement.

In re T2 Medical Inc. Securities Litigation, No. 94-cv-744 (N.D. Ga. 1995). Co-lead counsel. $50 million settlement.

Gelb v. AT&T, No. 90-cv-7212 (S.D.N.Y. 1994). Landmark decision regarding filed rate doctrine leading to injunctive relief.

In re International Technology Corporation Securities Litigation, No. 88-cv-40 (C.D. Cal. 1993). Co-lead counsel. $13 million settlement.

Colaprico v. Sun Microsystems, No. 90-cv-20710 (N.D. Cal. 1993). Co-lead counsel. $5 million settlement.

Steinfink v. Pitney Bowes, Inc., No. B90-340 (JAC) (D. Conn. 1993). Lead counsel. $4 million settlement.

In re Jackpot Securities Enterprises, Inc. Securities Litigation, No. CV-S-89-05-LDG (D. Nev. 1993). Lead counsel. $3 million settlement.

In re Nordstrom Inc. Securities Litigation, No. C90-295C (W.D. Wa. 1991). Co-lead counsel. $7.5 million settlement.

United Artists Litigation, No. CA 980 (Sup. Ct., L.A., Cal.). Trial counsel. $35 million settlement.

In re A.L. Williams Corp. Shareholders Litigation, C.A. No. 10881 (Delaware Ch. 1990). Lead counsel. Benefits in excess of $11 million.

In re Triangle Inds., Inc., Shareholders' Litigation, C.A. No. 10466 (Delaware Ch. 1990). Co-lead counsel. Recovery in excess of $70 million.

Schneider v. Lazard Freres, No. 38899, M-6679 (N.Y. App. Div. 1st Dept. 1990). Co-lead counsel. Landmark decision concerning liability of investment bankers in corporate buyouts. $55 million settlement.

Rothenberg v. A.L. Williams, C.A. No. 10060 (Delaware. Ch. 1989). Lead counsel. Benefits of at least $25 million to the class.

Kantor v. Zondervan Corporation, No. 88-cv-C5425 (W.D. Mich. 1989). Lead counsel. Recovery of $3.75 million.

King v. Advanced Systems, Inc., No. 84-cv-C10917 (N.D. Ill. E.D. 1988). Lead counsel. Recovery of $3.9 million (representing 90% of damages).

Straetz v. Cordis, No. 85-cv-343 (S.D. Fla. 1988). Lead counsel.

> "I want to commend counsel and each one of you for the diligence with which you've pursued the case and for the results that have been produced on both sides. I think that you have displayed the absolute optimum in the method and manner by which you have represented your respective clients, and you are indeed a credit to the legal profession, and I'm very proud to have had the opportunity to have you appear before the Court in this matter."

In re Flexi-Van Corporation, Inc. Shareholders Litigation, C.A. No. 9672 (Delaware. Ch. 1988). Co-lead counsel. $18.4 million settlement.

Entezed, Inc. v. Republic of Nigeria, I.C.C. Arb. (London 1987). Multi-million dollar award for client.

In re Carnation Company Securities Litigation, No. 84-cv-6913 (C.D. Cal. 1987). Co-lead counsel. $13 million settlement.

In re Data Switch Securities Litigation, B84 585 (RCZ) (D. Conn. 1985). Co-lead counsel. $7.5 million settlement.

Stern v. Steans, No. 80-cv-3903. The court characterized the result for the class obtained during trial to jury as "unusually successful" and "incredible" (Jun 1, 1984).

In re Datapoint Securities Litigation, No. 82-cv-338 (W.D. Tex.). Lead counsel for a Sub-Class. $22.5 million aggregate settlement.

Malchman, et al. v. Davis, et al., No. 77-cv-5151 (S.D.N.Y. 1984):

> "It is difficult to overstate the far-reaching results of this litigation and the settlement. Few class actions have ever succeeded in altering commercial relationships of such magnitude. Few class action settlements have even approached the results achieved herein.... In the present case, the attorneys representing the class have acted with outstanding vigor and dedication . . . Although the lawyers in this litigation have appeared considerably more in the state courts than in the federal court, they have appeared in the federal court sufficiently for me to attest as to the high professional character of their work. Every issue which has come to this court has been presented by both sides with a thoroughness and zeal which is outstanding .... In sum, plaintiffs and their attorneys undertook a very large and difficult litigation in both the state and federal courts, where the stakes were enormous. This litigation was hard fought over a period of four years. Plaintiffs achieved a settlement which altered commercial relationships involving literally hundreds of millions of dollars."

* * *

EXHIBIT B

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

Firm Name: Kirby McInerney LLP

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Robert Gralewski (P)											5.10				5.10	$950.00	$4,845.00
Sawa Nagano (OC) - **Capped**							228.20								228.20	$450.00	$102,690.00
Sawa Nagano (OC)		9.00		28.00					0.30				18.80		56.10	$650.00	$36,465.00
SUB-TOTAL	**0.00**	**9.00**	**0.00**	**28.00**	**0.00**	**0.00**	**228.20**	**0.00**	**0.30**	**0.00**	**5.10**	**0.00**	**18.80**	**0.00**	**289.40**		**$144,000.00**
NON-ATTORNEYS																	
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**9.00**	**0.00**	**28.00**	**0.00**	**0.00**	**228.20**	**0.00**	**0.30**	**0.00**	**5.10**	**0.00**	**18.80**	**0.00**	**289.40**		**$144,000.00**

EXHIBIT C

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
4/14/2017	Robert Gralewski	0.20	$810	$162.00	11	Emails with Nagano regarding [redacted] and serving as [redacted] and [redacted]
4/30/2017	Robert Gralewski	0.20	$810	$162.00	11	Emails with Nagano regarding [redacted]
8/15/2017	Robert Gralewski	0.20	$810	$162.00	11	Emails with Kim-Helms and Nagano regarding [redacted]
8/23/2017	Robert Gralewski	0.60	$810	$486.00	11	Assemble information regarding [redacted] and confer with Brizuela regarding [redacted]
8/23/2017	Robert Gralewski	0.20	$810	$162.00	11	Telephone and emails with Glackin and Williams regarding [redacted]
10/19/2017	Robert Gralewski	0.20	$810	$162.00	11	Follow up with Nagano regarding [redacted]
11/11/2017	Robert Gralewski	0.20	$810	$162.00	11	Emails with Nagano regarding [redacted]
GRALEWSKI TOTAL 2017:		**1.80**		**$1,458.00**		
2/12/2018	Robert Gralewski	0.10	$900	$90.00	11	Emails with Nagano regarding [redacted]
5/31/2018	Robert Gralewski	0.30	$900	$270.00	11	Emails with Glackin regarding [redacted] and conference to discuss [redacted]
6/4/2018	Robert Gralewski	0.30	$900	$270.00	11	Emails and telephone with Glackin regarding [redacted] and [redacted]
6/5/2018	Robert Gralewski	0.20	$900	$180.00	11	Email with Nagano regarding [redacted]
10/30/2018	Robert Gralewski	0.50	$900	$450.00	11	Emails with Glackin regarding trial [redacted] and assistance with [redacted]
10/30/2018	Robert Gralewski	0.20	$900	$180.00	11	Follow up with Nagano regarding assisting with [redacted]
10/30/2018	Robert Gralewski	0.10	$900	$90.00	11	Follow up with Glackin regarding [redacted]
11/7/2018	Robert Gralewski	0.50	$900	$450.00	11	Emails with Nagano regarding and oversee/manage [redacted]
11/7/2018	Robert Gralewski	0.50	$900	$450.00	11	Emails with Glackin regarding [redacted]
11/7/2018	Robert Gralewski	0.30	$900	$270.00	11	Follow up with Nagano regarding [redacted]
11/12/2018	Robert Gralewski	0.20	$900	$180.00	11	Emails with Glackin regarding [redacted] with [redacted] and impact on [redacted]
11/12/2018	Robert Gralewski	0.10	$900	$90.00	11	Follow up and emails with Nagano regarding [redacted] and [redacted]
GRALEWSKI TOTAL 2018:		**3.30**		**$2,970.00**		
4/8/2017	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations and drafted IPP's response to [redacted]
4/15/2017	Sawa Nagano	3.70	$450	$1,665.00	7	Reviewed certified translations and drafted IPP's response to [redacted]
4/15/2017	Sawa Nagano	0.30	$450	$135.00	7	Reviewed class certification order to address [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
4/22/2017	Sawa Nagano	2.70	$450	$1,215.00	7	Reviewed certified translations and drafted IPP's response to [redacted]
4/22/2017	Sawa Nagano	0.30	$575	$172.50	9	Reviewed class certification order to address [redacted]
4/26/2017	Sawa Nagano	1.00	$450	$450.00	7	Conference via phone and email with Kim-Helms regarding [redacted] and [redacted]
4/29/2017	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations and drafted IPP's response to [redacted] including [redacted]
5/6/2017	Sawa Nagano	2.50	$575	$1,437.50	2	Reviewed deposition memorandum for [redacted]
5/6/2017	Sawa Nagano	2.50	$575	$1,437.50	2	Reviewed and retrieved the documents that are cited in the [redacted] and [redacted]
5/9/2017	Sawa Nagano	2.00	$575	$1,150.00	2	Reviewed deposition memorandum for [redacted]
5/9/2017	Sawa Nagano	2.00	$575	$1,150.00	2	Reviewed and retrieved the documents that are cited in the [redacted] and [redacted]
5/10/2017	Sawa Nagano	10.00	$575	$5,750.00	4	Attended Shimokomaki (Sanyo/Panasonic) deposition as a check interpreter, dictated the witness' testimony and advised main interpreter on a certain interpretation and provided lead counsel with the Japanese corporate cultures and customs that would assist her with her line of questioning
5/11/2017	Sawa Nagano	10.50	$575	$6,037.50	4	Attended Shimokomaki (Sanyo/Panasonic) deposition as a check interpreter, dictated the witness' testimony and advised main interpreter on a certain interpretation and provided lead counsel with the Japanese corporate cultures and customs that would assist her with her line of questioning
5/12/2017	Sawa Nagano	7.50	$575	$4,312.50	4	Attended Shimokomaki (Sanyo/Panasonic) deposition as a check interpreter, dictated the witness' testimony and advised main interpreter on a certain interpretation and provided lead counsel with the Japanese corporate cultures and customs that would assist her with her line of questioning
5/20/2017	Sawa Nagano	2.50	$450	$1,125.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/27/2017	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
5/27/2017	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
6/3/2017	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
6/10/2017	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
6/10/2017	Sawa Nagano	1.00	$450	$450.00	7	Drafted [redacted]
6/15/2017	Sawa Nagano	2.50	$450	$1,125.00	7	Proofread draft [redacted]
6/17/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
6/24/2017	Sawa Nagano	5.50	$450	$2,475.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted] objections then proofread the draft, including [redacted]
8/18/2017	Sawa Nagano	0.20	$450	$90.00	7	Conference with Kim-Helms regarding [redacted]
8/18/2017	Sawa Nagano	0.30	$450	$135.00	7	Reviewed additional [redacted]
8/19/2017	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
8/25/2017	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
8/26/2017	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
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Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
8/28/2017	Sawa Nagano	0.50	$450	$225.00	7	Conference with Kim-Helms re: [redacted]
8/30/2017	Sawa Nagano	1.50	$450	$675.00	7	Conference with Kim-Helms re: [redacted]
9/2/2017	Sawa Nagano	5.50	$450	$2,475.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and [redacted]
9/9/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
9/16/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
9/23/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
9/30/2017	Sawa Nagano	4.50	$450	$2,025.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
10/7/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
10/14/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
10/17/2017	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
10/18/2017	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
10/19/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
10/28/2017	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
11/4/2017	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations, consulted with authoritative dictionaries and drafted [redacted]
11/6/2017	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries and drafted [redacted]
11/11/2017	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries and drafted [redacted]
11/18/2017	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations, consulted with authoritative dictionaries and drafted [redacted]
11/25/2017	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations, consulted with authoritative dictionaries and drafted [redacted]
12/23/2017	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
SAWA TOTAL 2017:		**159.50**		**$76,437.50**		
1/6/2018	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
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Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
1/13/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
1/20/2018	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
1/27/2018	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
2/3/2018	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
2/10/2018	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
2/17/2018	Sawa Nagano	5.00	$450	$2,250.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
3/3/2018	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
3/10/2018	Sawa Nagano	4.50	$450	$2,025.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
3/17/2018	Sawa Nagano	4.00	$450	$1,800.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/7/2018	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
4/9/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/10/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/12/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/13/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/16/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/17/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/18/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/19/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/20/2018	Sawa Nagano	1.50	$450	$675.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/23/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
4/24/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/25/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/26/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/27/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
4/30/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/1/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/3/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/4/2018	Sawa Nagano	2.50	$450	$1,125.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/7/2018	Sawa Nagano	1.00	$450	$450.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/8/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
5/9/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/10/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/11/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/14/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/15/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/16/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/17/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/18/2018	Sawa Nagano	2.00	$450	$900.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/25/2018	Sawa Nagano	3.00	$450	$1,350.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]
5/31/2018	Sawa Nagano	3.50	$450	$1,575.00	7	Reviewed certified translations, consulted with authoritative dictionaries, and drafted [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Detailed Time Records
March 1, 2017 - April 1, 2019

Transaction Date	Timekeeper	Time Spent	Rate Value/Doc Rvwr Rate	Lodestar	Activity Code	Description
6/1/2018	Sawa Nagano	8.00	$450	$3,600.00	7	Conference with Kim-Helms re: [redacted] and began reviewing [redacted], consulted with authoritative dictionaries, and drafted [redacted]
11/1/2018	Sawa Nagano	0.30	$625	$187.50	13	Conference with Chan of LCHB to provide analysis on [redacted]
11/5/2018	Sawa Nagano	0.50	$625	$312.50	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/7/2018	Sawa Nagano	1.00	$625	$625.00	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/8/2018	Sawa Nagano	1.00	$625	$625.00	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/9/2018	Sawa Nagano	3.50	$625	$2,187.50	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/10/2018	Sawa Nagano	4.00	$625	$2,500.00	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/11/2018	Sawa Nagano	4.00	$625	$2,500.00	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/12/2018	Sawa Nagano	3.00	$625	$1,875.00	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
11/13/2018	Sawa Nagano	1.50	$625	$937.50	13	Reviewed deposition exhibits and transcripts of [redacted], in preparation for [redacted]
SAWA TOTAL 2018:		**124.80**		**$59,450.00**		

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
KIRBY MCINERNEY LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$125,000.00
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	$17.32
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	$10,421.77
Miscellaneous	
TOTAL:	$135,439.09

EXHIBIT 35

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ROBERT J. GRALEWSKI, JR. IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KIRBY MCINERNEY LLP**

I, Robert J. Gralewski, Jr., Declare:

1. I am a partner at Kirby McInerney LLP ("Kirby"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Erinn Tozer and as counsel for IPPs throughout the course of this litigation. The background and experience of Kirby and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Kirby has performed vital work on behalf of the Class. For example, one of Kirby's native Japanese speaking lawyers – Sawa Nagano – has played an instrumental role in discovery. Because of Ms. Nagano's superior Japanese language skills and antitrust experience, Ms. Nagano has been tasked with high-level assignments such as: (1) having primary responsibility with transliteration for objection responses, and (2) selecting exhibits for, preparing for, actively assisting at, and serving as check translator at five depositions of Panasonic and Sanyo employees in 2015, 2016, and 2017.[1] Co-Lead Counsel also regularly relied upon Ms. Nagano to perform a myriad of other important tasks ranging from utilizing Japanese terms to search for and locate hot documents to providing English translations of foreign language documents which have been used as exhibits at depositions and in motions. Additionally,

[1] Ms. Nagano performed these duties in connection with the depositions of Fumitsugu Tachihara, Minoru Kondo, Akihiro Shimizu, Kazuhiro Nakae, and Hiroshi Shimokomaki. Ms. Nagano traveled to Japan for Mr. Nakae's deposition.

William Harris (another experienced Kirby antitrust lawyer) and I have reviewed documents at the direction of Co-Lead Counsel. This work included drafting a memorandum summarizing the results of a targeted review to help prepare for the hearing on NEC's Motion to Dismiss.

5. Attached hereto as **Exhibit B** is a billing summary of Kirby's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198). The total number of hours spent by Kirby during this period of time was 4,003.20, with a corresponding lodestar based on current rates of $1,788,491.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Kirby.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Kirby has incurred during the course of this litigation. Kirby expended a total of $133,946.20 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Kirby on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 24, 2017 at San Diego, California.

/s/ Robert J. Gralewski, Jr.

ROBERT J. GRALEWSKI, JR.

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A



Kirby McInerney LLP is a specialist plaintiffs' litigation firm with expertise in antitrust, commodities, securities, structured finance, whistleblower, health care, consumer, and other fraud litigation.

KM has achieved and is pursuing landmark results in the fields of antitrust, commodities fraud, securities fraud, corporate governance, consumer, and health care, representing our clients in both class actions and individual litigation. KM has recovered billions of dollars for its clients.

KM has been appointed interim lead counsel in *In re North Sea Brent Crude Oil Futures Litig.*, No. 13-md-02475 (S.D.N.Y.), a case brought on behalf of commodity futures traders alleging that certain oil companies misreported or otherwise manufactured market information for crude oil prices. KM also is co-lead counsel in the antitrust action *In re Libor-Based Financial Instruments Antitrust Litig.*, No. 11-md-02262 (S.D.N.Y.), a case alleging the fixing of prices of a benchmark interest rate; and co-lead counsel for the indirect purchaser plaintiffs in *In re Ductile Iron Pipe Fittings ("DIPF") Indirect Purchaser Antitrust Litig.*, No. 12-cv-169 (D.N.J.), a case alleging the raising and fixing of prices in the market for ductile iron pipe fittings.

KM was also co-lead counsel on behalf of indirect purchasers in *In re BP Propane Indirect Purchaser Antitrust Litig.*, No. 06-cv-3541 (N.D.Ill. 2010) which resulted in a $15 million settlement on behalf of propane purchasers.

KM served as lead counsel to classes of indirect purchasers in connection with antitrust proceedings against Microsoft in *Charles Cox and Old Factories, Inc. v. Microsoft Corp.*, Index No. 105193/00, Part 3 (N.Y. Sup. Ct.); *Gordon, et al. v. Microsoft Corp.*, No. MC 00-5994 (Minn. Dist Ct. Hennepin County). These litigations resulted in settlements totaling nearly a billion dollars for consumers in the States of New York, Florida, Tennessee, West Virginia, and Minnesota (where the litigation proceeded to trial). The specific cases cited here, conducted on behalf New York and Minnesota consumers, resulted in recoveries of approximately $350 million and $175 million, respectively.

Additionally, KM acted as lead counsel in *In re Reformulated Gasoline (RFG) Antitrust and Patent Litig. and Related Actions*, No. 05-cv-01671 (C.D. Cal), an antitrust class action pertaining to Unocal's alleged manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which plaintiffs claim caused inflated retail prices. This litigation resulted in a $48 million settlement for indirect purchasers. KM also acted as one of the firms with primary responsibility for *In re Visa Check/MasterMoney Antitrust Litig.*, No. 96-cv-05238 (E.D.N.Y.), a case on behalf of a class of retailers in connection with Visa MasterCard policies pertaining to debit card fees. The litigation resulted in a settlement of over $3 billion for the class and landmark injunctive relief.

KM has been involved in some of the most cutting edge areas of market manipulation cases, including a seminal case involving Sumitomo Corporation's manipulation of the copper market. Of late, KM represented market makers and hedge funds in commodities manipulation cases involving silver, propane and fixed income

products. KM's experience in market manipulation and price fixing for both indirect and direct purchasers, in cases brought under the Sherman Act and state law analogs, spans the markets for gasoline, propane, cement, concrete, steel, potash, silver and even fixed income products.

Many of KM's attorneys are exceptionally well versed in antitrust and commodities litigation. David Kovel, the partner with our firm most involved in commodities litigation, was a commodities trader prior to receiving his JD/MBA and worked in the commodities export markets. As a commodities trader, Mr. Kovel took financial risk in futures and options markets and traded physical markets in U.S., Europe, Asia and Latin America. He became a specialist at trading in futures delivery markets and understanding the relationship between futures prices and the physical spot market. Prior to joining KM, Alice McInerney was Chief of the Investor Protection Bureau and Deputy Chief of the Antitrust Bureau of the New York Attorney General's office. Partner Daniel Hume and our associates too have exceptional antitrust experience.

Some notable KM antitrust work includes:

• *In re Visa Check/MasterMoney Antitrust Litig.*, No. 96-cv-5238 (S.D.N.Y.) (over $3 billion settlement in direct purchaser debit card fee case – KM was class counsel with second largest lodestar in the case);

• *Microsoft antitrust cases*: KM acted as a lead counsel to classes of indirect purchasers in connection with antitrust proceedings against Microsoft. The litigations resulted in settlement totaling nearly a billion dollars for consumers in the states of New York, Florida, Tennessee, West Virginia, and Minnesota (where the litigation proceeded to trial). We presently are helping lead a similar effort on behalf of consumers and government entities in Canada;

• *CRT and LCD Price Fixing Cases*: KM is playing a lead role in the Cathode Ray Tube indirect purchaser antitrust litigation that is approaching trial and played a significant role as well in the Liquid Crystal Display indirect purchaser litigation which recently settled for over $1 billion;

• *In re Reformulated Gasoline (RFG) Antitrust and Patent Litig. and Related Actions*, No. 05-cv-01671 (C.D. Cal. 2005) ($48 million settlement on behalf of indirect gasoline purchasers);

• *In re BP Propane Indirect Purchaser Antitrust Litig.*, No. 06-CV-3541 (N.D.Ill. 2010) ($15 million settlement on behalf of indirect propane purchasers);

• *In re Potash Antitrust Litig.*, No. 08-cv-06910 (N.D.Ill. 2008) (indirect purchaser price fixing case – pending on appeal);

• *In re Commodity Exchange, Inc., Silver Futures and Options Trading Litig.*, No. 11-md-02213 (S.D.N.Y. 2011) (market manipulation case pending);

• *Supreme Auto Transport LLC v. Arcelor Mittal et al.*, No. 08-cv-05468 (N.D. Ill. 2008) (indirect purchaser price fixing case pending); and

• *In re Sumitomo Copper Litig.*, No. 96-cv-4584 (S.D.N.Y. 1999) (counsel in matter involving settlement of over $140 million in market manipulation case).

CURRICULA VITAE

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Roger W. Kirby is Of Counsel to the firm. He has written several articles on litigation, the Federal Rules of Civil Procedure and Federal Rules of Evidence that have been published by various reporters and journals, and has been on the board of editors of Class Action Reports. He has also lectured on aspects of securities litigation to various professional organizations in the United States and abroad. Mr. Kirby has enjoyed considerable success as a trial attorney, and cases for which he has had primary responsibility have produced landmark decisions in the fields of securities law, corporate governance, and deceptive advertising.

Some of Mr. Kirby's relevant work includes:

- Representation of a putative class of initial public offerors in *Cordes & Company Financial Services v A.G. Edwards & Sons, Inc*. On appeal to the Court of Appeals for the Second Circuit, the court reversed the decision below, and held that assignees may be class representatives. It also clarified the meaning of antitrust injury;

- Representation of an objector to the settlement in *Reynolds v. Beneficial National Bank* in the United States Northern District Court for the District of Illinois. Mr. Kirby and KM persuaded the Court of Appeals for the Seventh Circuit and ultimately the district court to overturn the settlement, and were then appointed co-lead counsel to the class. Mr. Kirby and KM were lauded by the presiding judge for their "intelligence and hard work," and for obtaining "an excellent result for the class.";

- Representation, as lead counsel, of a class of investors in *Gerber v. Computer Associates International, Inc.*, a securities class action that resulted in a multimillion dollar recovery jury verdict that was upheld on appeal; and

- Representation, as lead counsel, of purchasers of PRIDES securities in connection with the Cendant Corporation accounting fraud. Mr. Kirby was instrumental in securing an approximate $350 million settlement for the class – an unprecedented 100 percent recovery.

Mr. Kirby is admitted to the New York State Bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States Courts of Appeals for the First, Second, Third, Fifth, Seventh, Eighth, Ninth, and Eleventh Circuits, the United States District Court, District of Connecticut, and the United States Supreme Court. He attended Stanford University & Columbia College (B.A.) and Columbia University School of Law (J.D.) where he was an International Fellow. He also attended The Hague Academy of International Law (Cert. D'Att.). Thereafter, he was law clerk to the late Honorable Hugh H. Bownes, United States District Court for New Hampshire, and the United States Court of Appeals for the First Circuit. He recently authored *Access to United States Courts By Purchasers Of Foreign Listed Securities In The Aftermath of Morrison v. National Australia Bank Ltd.*, 7 Hastings Bus. L.J. 223 (Summer 2011). Mr. Kirby is a visiting Law Fellow at the University of Oxford, St. Hilda's College, Oxford, U.K. Mr. Kirby is conversant in French and Italian.

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Alice McInerney is Of Counsel to the firm and practices out of our New York office. She focuses on antitrust and consumer matters, and also handles securities class actions. Ms. McInerney joined the firm in 1995 and has over 30 years of experience as an attorney.

Prior to joining KM, Ms. McInerney was Chief of the Investor Protection Bureau and Deputy Chief of the Antitrust Bureau of the New York Attorney General's office. While there, she chaired the Enforcement Section of the North American Securities Administrators Association and also chaired the Multi-State Task Force on Investigations for the National Association of Attorneys General. Alice is also a member of the National Association of Public Pension Attorneys (NAPPA).

Some of Ms. McInerney's relevant work includes:

- Representation, as lead and co-lead counsel, of consumer classes in antitrust cases against Microsoft. These litigations resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota;

- Representation of a class of retailers in *In re Visa Check/Master Money Antitrust Litigation*, an antitrust case which resulted in a settlement of over $3 billion for the class;

- Representation of public entities in connection with ongoing Medicaid fraud and false claims act litigations arising from health expenditures of these state and local governmental entities; and

- Representation of California homeowners in litigation arising from mortgage repayment irregularities. Litigation resulted in settlements that afforded millions of California homeowners clear title to their property. The cases resulted in the notable decision *Bartold v. Glendale Federal Bank*.

Ms. McInerney is admitted to the New York State Bar, all United States District Courts for the State of New York, the United States Court of Appeals for the Second Circuit and the United States Supreme Court. She graduated from Smith College (B.A. 1970) and Hofstra School of Law (J.D. 1976).

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David Bishop is a partner practicing out of our New York office, where he coordinates domestic client and government relations. Mr. Bishop joined the firm in 2006 following a distinguished career in local government. Mr. Bishop was elected to the Suffolk County Legislature in 1993 while still attending Fordham Law School. There he served in several leadership capacities, including Democratic Party Leader, Chairman of Public Safety and Chairman of Environment. His legislative record earned him recognition from the Nature Conservancy, the Child Care Council and the Long Island Federation of Labor.

As an attorney in private practice, Mr. Bishop has litigated numerous NASD arbitrations on behalf of claimants.

Recent cases in which Mr. Bishop has been involved include:

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation*, a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation, as lead counsel, of classes of consumers harmed by price fixing in the LCD flat panel and SRAM markets; and

- Representation, as co-lead counsel, of an investor class led by an individual investor in *Lapin v. Goldman Sachs*, a securities class action against Goldman Sachs. This litigation resulted in a recovery of $29 million for the class.

Mr. Bishop is admitted to the New York State Bar and the United States District Court for the Eastern and Southern Districts of New York. He is a member of the Public Investors Arbitration Bar Association and of the New York City Bar Association. He graduated from American University (B.A., 1987) and from Fordham University (J.D., 1993).



Randall M. Fox is a partner in our New York office, focusing on whistleblower, antitrust and consumer fraud matters. Mr. Fox joined the firm in 2014 after having served as the founding Bureau Chief of New York Attorney General's Taxpayer Protection Bureau. The Bureau handles claims that the government was defrauded, including claims brought by whistleblowers. Before being promoted to Bureau Chief, Mr. Fox was a Special Assistant Attorney General in the New York Attorney General's Medicaid Fraud Control Unit, where he handled cases involving healthcare fraud. He currently serves on the Law360 Government Contracts Editorial Advisory Board.

Recent cases handled or supervised by Mr. Fox at the Attorney General's Office include:

- Pursued $400 million False Claims Act claims raised by a whistleblower against Sprint Corporation for knowingly failing to pay New York State and local sales taxes on its monthly flat-rate charges for cell phone service. This case is ongoing;

- Represented New York in its first government initiated False Claims Act case, pursuing Medicaid claims against pharmaceutical giant Merck & Co. alleging that the government was defrauded in paying for Merck's pain drug Vioxx. The case settled on a nationwide basis for $980 million, with over $60 million going to New York;

- Pursued investigations into food services companies that had kept rebates rather than passing them along to schools and other public institutions as required by their contracts and regulations. Settled for nearly $20 million;

- Co-led team of states that participated in $11 million settlement of False Claims Act allegations that technology company CA, Inc. falsely overcharged governmental customers for service plans;

- Pursued False Claims Act allegations on behalf of a whistleblower against a medical imaging company for failing to pay New York corporate income taxes while conducting substantial business in the State. Settled for $6.2 million;

- Pursued claims on behalf of a whistleblower against Mohan's Custom Tailors for knowingly failing to pay sales taxes that were nevertheless collected from customers. The resolution included a plea to criminal charges and an agreement to jail time. This case settled for $5.5 million ; and

- Settled claims against an accounting firm for falsely certifying a substance abuse clinic's inflated claims for Medicaid payments.

Before joining the New York Attorney General's Office in 2007, Mr. Fox was a partner at the law firm of LeBoeuf, Lamb, Greene & MacRae, LLP, where his practice focused on class actions, commercial disputes, and securities and consumer fraud actions. Mr. Fox is admitted to the New York State bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second, Third, Eighth and Ninth Circuits, and the United States Tax Court. He graduated from Williams College (B.A., 1988), and New York University School of Law (J.D., 1991).

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Robert J. Gralewski, Jr. is a partner based in our California office. Mr. Gralewski focuses on antitrust and consumer litigation and has been involved in the fields of complex litigation and class actions for over 15 years. Throughout the course of his career, Mr. Gralewski has prosecuted a wide variety of federal and state court price-fixing, monopoly and unfair business practice actions against multinational companies, major corporations, large banks, and credit card companies.

Some of Mr. Gralewski's relevant work includes:

- Representation of businesses and consumers in indirect purchaser class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly. Mr. Gralewski was a member of the trial teams in the Minnesota and Iowa actions (the only two Microsoft class actions to go to trial) which both settled in plaintiffs' favor after months of hard-fought jury trials. The Microsoft cases in which Mr. Gralewski was involved in ultimately settled for more than $2 billion in the aggregate;

- Representation of businesses and consumers of thin-film transistor liquid crystal display (TFT-LCD) products who were harmed by an alleged price-fixing conspiracy among TFT-LCD manufacturers; and

- Representation of businesses and consumers in an indirect purchaser class action against various manufacturers of SRAM, alleging that defendants engaged in a conspiracy to fix prices in the SRAM market.

Mr. Gralewski is a member of the California State Bar and is admitted to practice in state and all federal courts in California as well as several federal courts throughout the country. He graduated from Princeton University (B.A., 1991) and *cum laude* from California Western School of Law (J.D., 1997).

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Daniel Hume is a partner in our New York office and is a member of the firm's management committee. Mr. Hume's practice focuses on securities, structured finance, and antitrust litigation. He joined the firm in 1995 and has helped to recover billions of dollars for corporate consumers, individual consumers, and institutional investors throughout the course of his career.

Some of Mr. Hume's relevant work includes:

- Representation, as lead counsel, of a group of Singapore-based investors in a securities class action against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. Plaintiffs allege that Morgan Stanley routed Pinnacle investors' principal into synthetic collateralized debt obligations (CDOs) that it built to fail and then bet against. As the CDOs failed by design, plaintiffs' principal was swapped to Morgan Stanley, enriching Morgan Stanley while rendering the Pinnacle Notes an all-but-total loss. This case settled for $20 million;

- Representation, as lead counsel, of the investor class in *In re AT&T Wireless Tracking Stock Securities Litigation*, a securities class action which resulted in recovery of $150 million for the class; and

- Representation, as lead counsel, of consumer classes in connection with antitrust proceedings against Microsoft in the United States and Canada. So far, these litigations have resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial.

Mr. Hume is admitted to the New York State Bar and federal courts around the country, including the United States District Courts for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second, Third, Fourth, Fifth, Eighth and Ninth Circuits, the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, and the United States Supreme Court. He graduated from the State University of New York at Albany *magna cum laude* (B.A. Philosophy, 1988) and from Columbia Law School, where he served as Notes Editor for the Columbia Journal of Environmental Law (J.D., 1991).

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David E. Kovel is a partner based in our New York office and is a member of the firm's management committee. Mr. Kovel's practice focuses on whistleblower, antitrust, commodities, securities and corporate governance matters. Mr. Kovel joined the firm in 2004.

Recent cases in which Mr. Kovel has been involved include:

- *In re Libor-Based Financial Instruments Antitrust Litigation*. Court appointed co-liaison counsel for all class actions in the multi-district litigation and co-lead counsel for exchange-based class alleging the fixing of prices of a benchmark interest rate. Obtained a $20 million settlement with one of 16 defendants (the first settlement in the ongoing complex litigation). Remaining claims are pending;
- Representation, as counsel for lead plaintiff and other share holders in a derivative action brought against members of the Board of Directors and senior executives of Pfizer, Inc. for breach of fiduciary duty. Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters;
- Representation of purchasers of pharmaceutical drugs claiming to have been harmed by Branded manufacturers who fraudulently extended patent or other regulation monopolies;
- Representation, as lead counsel, of a class of New York State consumers in connection with antitrust proceedings against Microsoft;
- Representation, as lead counsel, of a class of gasoline purchasers in California in connection with Unocal, Inc.'s manipulation of the standard-setting process for gasoline. The litigation resulted in a $48 million recovery for the class;
- Representation, as lead counsel in *In re North Sea Brent Crude Oil Futures Litig* on behalf of a proposed class of traders alleging benchmark manipulation. This litigation is ongoing;
- Representation of propane purchasers who were harmed by BP America's manipulation of the physical propane market; and
- Representation of various whistleblowers who claim that their companies have defrauded the United States Government or other state and city governments.

Mr. Kovel also has an active pro bono practice, having represented, among others, clients in need of housing referred through the office of *pro se* litigation in the Southern District of New York, clients in foreclosure matters, and a Latino soccer association in its efforts organize and obtain a fair proportion of field time from a municipality.

Mr. Kovel is admitted to the New York State Bar, the United States District Courts for the Southern, Eastern, and Western Districts of New York, the United States Court of Appeals for the First Circuit, and the Connecticut State Bar. He is a member of the New York City Bar Association Committee on Futures and Derivatives Regulation, and is a former member of the New York City Bar Association Antitrust Committee. He graduated from Yale University (B.A.), Columbia University School of Law (J.D.) and Columbia University Graduate School of Business (M.B.A.). Mr. Kovel traded commodities for several years before attending law school. Prior to joining KM, Mr. Kovel practiced at Simpson Thacher & Bartlett LLP. He is fluent in Spanish.

Karen M. Lerner is a partner and practices out of the New York office. She focuses on antitrust, commodities and healthcare fraud. Ms. Lerner joined the firm in 2015, and has been a practicing attorney since 1991, handling numerous state and federal actions, including disciplinary, trial and appellate matters.

Some of Ms. Lerner's relevant work includes:

- Representation as fiduciary for the interim exchange class counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* for a putative class of participants who traded futures and options in the FX market. The case has already resulted in a partial settlement of more than $2 billion;

- Representation, as co-lead counsel, of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates; and

- Representation as a counsel in the benchmark rate antitrust litigation on behalf of a putative class of investors who traded futures and options contracts on the NYSE LIFFE exchange against global financial institutions responsible for the setting the Euro Interbank Offered Rate ("Euribor"). The case has already resulted in a partial settlement of more than $90 million.

Ms. Lerner is admitted to the New York State Bar, New Jersey State Bar, United States Supreme Court, U.S. District Court for the Eastern District of New York, U.S. District Court for the District of New Jersey, U.S. Court of Appeals for the 3rd Circuit, and the United States District Court for the Southern District of New York. Ms. Lerner graduated from the University of Albany – SUNY (B.A. 1988, *summa cum laude*), and the University of Pennsylvania School of Law (J.D. 1991).

Prior to joining KM, Ms. Lerner was Of Counsel at McDonough, Korn & Eichhorn, where she worked cases involving professional liability defense, negligence, insurance coverage, and products liability.

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Peter S. Linden is a partner in our New York office and is a member of the firm's management committee. Mr. Linden's practice concentrates on securities, shareholder derivative, commercial and healthcare fraud litigation. He joined the firm in 1990 and provides advisory services to government pension funds and other institutional investors as well as to corporate and individual consumers. He has been appointed a Special Assistant Attorney General for the State of Michigan and is a member of the National Association of Public Pension Plan Attorneys.

Mr. Linden has obtained numerous outstanding recoveries for investors and consumers during his career. His advocacy has also resulted in many notable decisions, including in *In re Matsushita Securities Litigation*, granting partial summary judgment under § 14(d)(7) of the Securities Exchange Act, and *In re Ebay Inc. Shareholders Litigation*, a shareholder derivative action, finding that investment banking advisors could be held liable for aiding and abetting insiders' acceptance of IPO allocations through "spinning".

Some of Mr. Linden's relevant experience includes:

- Representation, as lead counsel, of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation of the City of New York and 43 New York counties in federal Medicaid fraud actions. KM has settled or reached agreements in principle with all defendants in these matters. We have recovered over $225 million for the New York and Iowa Medicaid programs;

- Representation of the State of Michigan in a lawsuit filed in Michigan State Court against McKesson Corporation, Hearst Corporation, and First DataBank, a case arising out of the defendants' fraudulent scheme to increase the Average Wholesale Prices of hundreds of brand name drugs thereby causing false claims to be submitted to the Michigan Medicaid program. This case recently settled;

- Representation, as co-lead counsel, of an investor class and an institutional plaintiff in *In re BISYS Securities Litigation*, a class action arising out of alleged accounting improprieties and which resulted in a $65 million recovery for the class;

- Serving as Chairman of the Plaintiffs' Steering Committee in *In re MCI Non-Subscriber Litigation*, a consumer class action which resulted in an approximately $90 million recovery for the class; and

- In *Reynolds v. Beneficial National Bank,* Mr. Linden and KM successfully persuaded the 7th Circuit U.S. Court of Appeals and ultimately the district court to overturn a questionable settlement, and were then appointed co-lead counsel to the class. Mr. Linden and KM were lauded by the district judge for their "intelligence and hard work," and for obtaining "an excellent result for the class."

Mr. Linden is admitted to the New York State Bar, the U.S. Courts of Appeals for the Second, Third, Sixth, Seventh, Eighth, and Tenth Circuits, and the U.S. District Courts for the Eastern and Southern Districts of New York, the Eastern District of Michigan, and the District of Colorado. He graduated from the State University of New York at Stony Brook (B.A., 1980) and the Boston University School of Law (J.D., 1984).

Prior to joining KM, Mr. Linden worked as an assistant district attorney in the Kings County District Attorney's Office from 1984 through October, 1990 where he served as a supervising attorney of the Office's Economic Crimes Bureau.

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Andrew M. McNeela is a partner in our New York office focusing on securities and structured finance litigation. Mr. McNeela joined the firm in 2008.

Some of Mr. McNeela's relevant work includes:

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million;

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation, as lead counsel, a group of Singapore-based investors in a securities class action against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. Plaintiffs allege that Morgan Stanley routed Pinnacle investors' principal into synthetic collateralized debt obligations (CDOs) that it built to fail and then bet against. As the CDOs failed by design, plaintiffs' principal was swapped to Morgan Stanley, enriching Morgan Stanley while rendering the Pinnacle Notes an all-but-total loss. This case settled for $20 million;

- Representation, as lead counsel, in the securities class action *In Re Herley Industries Inc. Securities Litigation* on behalf of investors. This litigation resulted in a recovery of $10 million for the class; and

- Representation, as lead counsel, of investors in Goldman Sachs common stock in a securities class action case pertaining to Goldman's alleged instruction to their research analysts to favor procurement of investment banking deals over accuracy in their research. Disclosure caused Goldman Sachs' stock to decline materially. This litigation resulted in a recovery of $29 million for the class.

Immediately prior to joining KM, Mr. McNeela served as an Assistant United States Attorney in the Civil Division of the United States Attorney's Office for the Southern District of New York. In this capacity, he represented the United States in a wide array of civil litigation. Mr. McNeela has argued over twenty cases before the United States Court of Appeals for the Second Circuit. In 2013, he was named one of the top attorneys under 40 by Law360's Rising Stars.

Mr. McNeela is admitted to the New York State Bar, the United States Court of Appeals for the Second Circuit, and the United States District Courts for the Southern and Eastern Districts of New York. He is a member of the New York American Inn of Court. He graduated from Washington University (B.A., 1995) and from Hofstra University School of Law (J.D., 1998, *cum laude*), where he was a member of the Law Review.

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Ira M. Press is a partner in our New York office and is a member of the firm's management committee. Mr. Press's practice focuses on securities and consumer litigation. He joined the firm in 1993, and currently leads the firm's institutional investor monitoring program. In this capacity, he has provided advisory services to numerous government pension funds and other institutional investors. He has authored articles on securities law topics and has lectured to audiences of attorneys, experts and institutional investor fiduciaries.

Mr. Press' advocacy has resulted in several landmark appellate decisions, including *Rothman v. Gregor*, the first ever appellate reversal of a lower court's dismissal of a securities class action suit pursuant to the 1995 Private Securities Litigation Reform Act.

Some of Mr. Press' relevant experience includes:

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million;

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million; and

- Representation, as lead counsel, of investors in Goldman Sachs common stock in a securities class action case pertaining to Goldman's alleged instruction to their research analysts to favor procurement of investment banking deals over accuracy in their research. Disclosure caused Goldman Sachs' stock to decline materially. This case resulted in a $29 million recovery for the class.

Mr. Press is admitted to the New York State Bar, the United States Courts of Appeals for the Second, Third, Fourth, Fifth, Sixth, Eighth, Ninth, and Tenth Circuits, and the United States District Courts for the Eastern and Southern Districts of New York. He graduated from Yeshiva University *magna cum laude* (B.A., 1986) and from New York University Law School (J.D., 1989).

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Mark Strauss is a partner in our New York office. He represents whistleblowers in qui tam cases under the False Claims Act, defrauded investors, bilked consumers and other victims of corporate and financial wrongdoing in class actions and arbitrations throughout the country. Mr. Strauss has experience litigating under the Racketeer Influenced and Corrupt Organizations Act (RICO), and the securities, antitrust and consumer protection laws. His practice also includes litigating FINRA securities arbitrations against large firms on Wall Street. Cases litigated by Mr. Strauss have resulted in recoveries for aggrieved plaintiffs totaling hundreds of millions of dollars.

Some of Mr. Strauss's relevant work includes:

- *United States Ex rel Dickhudt v. Winds Enters*. (W.D. Wash.). Representation of a whistleblower in qui tam case against Chinese apparel manufacturer for evasion of U.S. import duties through use of false customs declarations and phony invoices. Client received award of 20% of $1.5 million settlement recovered for taxpayers;

- *United States ex rel Karlin v. Noble Jewelry Co*. (S.D.N.Y.). Representation of a whistleblower in qui tam action against Chinese manufacturer for misclassification of goods under U.S. Harmonized Tariff Schedule (the HTSA) and underpayment of import duties. Client received award of 19% of $3.85 million settlement recovered for taxpayers;

- *Rothstein v. GMAC Mortg.* (Bankr. S.D.N.Y). Representation, as Class Counsel, of residential mortgage borrowers in class action for violations of RICO in connection with kickback scheme that resulted in overcharges for force-placed insurance. Case resulted in $13 million settlement.

- *Parker v. AHMSI Ins. Agency* (S.D. Fla.). Representation, as Lead Counsel, of mortgage borrowers in class action for violations of RICO in connection with undisclosed rebate scheme and overcharges for lender-placed insurance;

- *In re Citigroup Inc. Securities Litig.* (S.D.N.Y.). Representation, as Co-Lead Counsel, of investors in securities class action relating to bank's exposure to Collateralized Debt Obligations (CDOs) containing toxic mortgage-backed securities. Case resulted in $590 million settlement; and

- *In re Adelphia Commc'n Corp. Securities Litig*. (S.D.N.Y.). Representation, as Co-Lead Counsel, of shareholders in securities class action involving improper self-dealing by corporate insiders and billions of dollars in undisclosed liabilities. Case resulted in $478 million in settlements.

Mr. Strauss is admitted to the New York State Bar, the California State Bar, and the United States District Courts for the Eastern and Southern Districts of New York, and the Northern, Eastern, Southern and Central Districts of California. He graduated from Cornell University (B.A., 1987) and from Fordham University School of Law, where he was Associate Editor of the Law Review (J.D., 1993).

Prior to joining Kirby McInerney, Mr. Strauss practiced at Christy & Viener, LLP and Cahill Gordon & Reindel LLP where he focused on complex commercial litigation.



Christopher S. Studebaker is a partner in our New York office focusing on antitrust, structured finance, and securities litigation. Mr. Studebaker joined the firm in 2007.

Recent cases on which Mr. Studebaker has worked include:

- Representation of the State of Michigan in a lawsuit filed in Michigan State Court against McKesson Corporation, Hearst Corporation, and First DataBank. The case alleges that each defendant caused false claims to be submitted to the Michigan Medicaid program, and the overpayment of Medicaid pharmacy claims;

- Representation, as lead counsel, of a group of Singapore-based investors in a securities class action against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. Plaintiffs allege that Morgan Stanley routed Pinnacle investors' principal into synthetic collateralized debt obligations (CDOs) that it built to fail and then bet against. As the CDOs failed by design, plaintiffs' principal was swapped to Morgan Stanley, enriching Morgan Stanley while rendering the Pinnacle Notes an all-but-total loss. This case settled for $20 million;

- Representation, as lead counsel, in *In Re Herley Industries Inc. Securities Litigation* on behalf of investors. This litigation resulted in a recovery of $10 million;

- Representation of direct purchasers against Becton Dickinson for alleged monopolization of the hypodermic syringe market. This litigation is ongoing;

- Representation of California consumers against Intel for alleged monopolization of the X86 microprocessor chip market. This litigation is ongoing; and

- Representation of consumers against TFT-LCD manufacturers for alleged price-fixing of the TFT-LCD market. This litigation is ongoing.

Before joining the firm, Mr. Studebaker worked as an associate with an antitrust and consumer protection boutique, and served at the U.S. Department of Commerce. Prior to attending law school, Mr. Studebaker worked and studied in Japan.

Mr. Studebaker is admitted to the New York State Bar, the Washington State Bar, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second Circuit. He is a member of the Asian American Bar Association of New York. Mr. Studebaker graduated from Georgetown University (B.S.F.S., 1997, *cum laude*), Waseda University (M.A., 2001), and University of Kansas (J.D., 2004), where he was Managing Editor of the Journal of Law & Public Policy. He is fluent in Japanese.

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Randall K. Berger is Of Counsel to the firm and practices out of our New York office. He joined the firm in 1994. Mr. Berger focuses on commercial arbitration, antitrust, whistleblower and unclaimed property litigation. In whistleblower cases, fraud against Federal and State governments is exposed by persons having unique knowledge of the circumstances surrounding the fraud. The whistleblowers are often compensated from any recovery and the cases are generally litigated under seal.

Mr. Berger is a certified arbitrator for FINRA (the Financial Industry Regulatory Authority). The arbitration panels where Mr. Berger serves are used to resolve disputes between investors and broker dealers or registered representatives, and to resolve intra-industry conflicts.

Some of Mr. Berger's relevant work includes:

- Representation of municipal issuers of Auction Rate Securities in FINRA arbitrations against underwriters alleging misrepresentation and breach of fiduciary duty;
- Representation of State Treasurers in litigation against the Federal government to recover unclaimed U.S. savings bond proceeds;
- Antitrust litigation against the 27 largest investment banks in the United States in connection with alleged price fixing in the market for the underwriting of initial public stock offerings; and
- Representation, as co-lead counsel, of investors in Ponzi scheme instruments issued by the now-bankrupt Bennett Funding Group in a class action which resulted in a recovery of $169.5 million for the class.

Mr. Berger is admitted to the New York State Bar, the United States District Courts for the Southern, Eastern and Northern Districts of New York and the District of Colorado. He graduated from Iowa State University (B.S., 1985) and from the University of Chicago (J.D., 1992).

Prior to attending law school and joining KM, Mr. Berger was an associate with the law firm Winston & Strawn, and before that, a consultant with the Management Information Consulting Division of Arthur Andersen & Co.

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Will Harris is Of Counsel to the firm. He focuses on antitrust and consumer litigation.

Some of Mr. Harris's relevant work includes:

- Representation of direct purchasers in a class action against the manufacturers of drywall in *In re Domestic Drywall Antitrust Litigation*. The defendants allegedly unlawfully conspired to artificially inflate the prices of drywall in the U.S.;
- Representation of businesses and consumers of thin-film transistor liquid crystal display (TFT-LCD) products who were harmed by an alleged price-fixing conspiracy among TFT-LCD manufacturers; and
- Representation of businesses and consumers in an indirect purchaser class action against various manufacturers of SRAM, alleging that defendants engaged in a conspiracy to fix prices in the SRAM market.

Mr. Harris is admitted to the New York State Bar and the United States District Court for the Southern District of New York. He graduated from The College of William & Mary (B.A. 2001) and Washington and Lee University School of Law (J.D. 2005).

Prior to joining KM, Mr. Harris was an associate with the law firm Gergosian & Gralewski, and before that, he worked as a contract attorney with KM in connection with the firm's Microsoft litigation, which ultimately settled for more than $2 billion in the aggregate.

John Low-Beer is Of Counsel to the firm and focuses on whistleblower litigation. Mr. Low-Beer formerly was Assistant Corporation Counsel, Affirmative Litigation with the NYC Law Department (1987-2000, 2003-2013), and was the lead attorney on complex and highly publicized matters, including:

- Suit against BNY Mellon concerning FX trading for City pension funds;
- Litigation concerning City taxation of consular and U.N. mission staff housing;
- Successful challenge to New York State's misallocation of $750 million in federal stimulus funding;
- Suit forcing Governor to implement State takeover of $2.5 billion in City debt; and
- Suits against more than 40 pharmaceutical companies recovering $240 million (with Kirby McInerney).

In addition, Mr. Low-Beer has a robust pro bono and low bono practice, representing plaintiffs in immigration, urban land use, guardianship, and whistleblower cases. Recent wins include *Avella v. City of New York*, 131 A.D.3d 77 (1st Dept. 2015), which invalidated a plan to build a shopping mall on parkland in Queens, and *Matter of Daniel B.*, 22 N.Y.S.3d 553 (2d Dept. 2015), which upheld a judgment in a guardianship/turnover proceeding.

Prior to joining the NYC Law Department, Mr. Low-Beer was law clerk to Hon. Leonard Garth, U.S. Court of Appeals for the Third Circuit, and Associate Professor at York College, CUNY, and Assistant Professor at Yale School of Management and Department of Sociology. He is the author of a book, *Protest and Participation* (Cambridge U.P. 1978) and a prize-winning note in the Yale L.J., "The Constitutional Imperative of Proportional Representation," among other publications.



Beverly Mirza is Of Counsel to the firm and focuses on antitrust and securities litigation. Ms. Mirza joined the firm in 2004.

Cases on which Ms. Mirza has worked include:

- Representation of a class of consumers in connection with *In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions.* This case involves Unocal's manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which increased retail prices of reformulated gasoline. This litigation resulted in a $48 million recovery for the class;

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates;

- Representation, as one of the firms with primary responsibility for the case, of a class of purchasers of computers containing Intel's microprocessor chips in *Coordination Proceedings Special Title, Intel x86 Microprocessor Cases*. This litigation is ongoing;

- Representation of a class of retailers in *In re Chocolate Confectionary Antitrust Litigation,* alleging price fixing claims against a group of chocolate manufacturers in the United States and abroad;

- Representation of a class of sellers in *In re Ebay Seller Antitrust Litigation*, alleging monopolization claims against Ebay;

- Representation of an objector to the settlement in *Reynolds v. Beneficial National Bank* in the United States Northern District Court for the District of Illinois. Ms. Mirza and KM were lauded by the presiding judge for their "intelligence and hard work," and for obtaining "an excellent result for the class."

Ms. Mirza is admitted to the California State Bar and the United States District Courts for the Northern and Central Districts of California. Her practice is supervised by members of the State Bar of New York. She graduated from California State University of Los Angeles *magna cum laude* (B.S., 2000) and from California Western School of Law (J.D., 2004).



Sawa Nagano is Of Counsel to the firm. She focuses on the representation of clients in relation to price-fixing litigation under the Sherman Antitrust Act and other federal and state laws to recover overcharges caused by international price-fixing cartels. Ms. Nagano joined the firm in 2013.

Recent cases on which Ms. Nagano has worked include:

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm.

Prior to joining KM, Ms. Nagano worked with the law firms of both Orrick, Herrington, and Sutcliffe LLP and Crowell and Morning LLP, where she assisted in the investigation of conspiracies to engage in price-fixing and anticompetitive practices by manufacturers and multinational conglomerates, and she represented cable operators on matters arising before the Federal Communications Commission as well as in their relations with local and state franchising authorities. She also worked for the New York bureau of a major Japanese television network. Additionally, she interned with the Office of Commissioner Furchtgott-Roth at the Federal Communications Commission and worked as a student counsel at the Art, Sports and Entertainment Law Clinic of the Dickinson School of Law of the Pennsylvania State University.

Ms. Nagano is admitted to the New York State Bar, the New Jersey State Bar, the Bar of the District of Columbia, and the United States District Courts for the Southern District of New York and the District of New Jersey. She graduated from Sophia University in Tokyo, Japan (B.A., 1989), New York University (M.A., 1992), and The Dickinson School of Law of the Pennsylvania State University (J.D., 2000). She is fluent in Japanese.

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Henry Telias is Of Counsel to the firm and practices out of our New York office, focusing on accountants' liability and securities litigation. Mr. Telias joined the firm in 1997.

In addition to his legal work, Mr. Telias is the firm's chief forensic accountant. He holds the CFF credential (Certified in Financial Forensics) and the PFS credential (Personal Financial Specialist) from the American Institute of Certified Public Accountants. Mr. Telias received his CPA license from New York State in 1982. Prior to practicing as an attorney, he practiced exclusively as a certified public accountant from 1982 to 1989, including 3 years in the audit and tax departments of Deloitte Haskins & Sells' New York office.

Some of Mr. Telias' relevant experience includes:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case resulted in a settlement of $168 million;

- Representation of the New York City Pension Funds as lead plaintiff in a class action against Wachovia Corporation arising from Wachovia's alleged misrepresentations of their exposure to the subprime market. This case resulted in a settlement of $75 million; and

- Representation, as lead counsel, of a certified class of purchasers of PRIDES securities in connection with the Cendant Corporation accounting fraud in *In re Cendant Corporation PRIDES Litigation.* This litigation resulted in an approximate $350 million settlement for the certified class – an unprecedented 100 percent recovery.

Mr. Telias is admitted to the New York State Bar and the United States District Court for the Southern District of New York. He graduated from Brooklyn College *cum laude* (B.S., 1980) and from Hofstra University School of Law (J.D., 1989).

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Edward M. Varga, III is Of Counsel to the firm and practices out of our New York office. He focuses on securities and antitrust litigation. Mr. Varga joined the firm in 2006.

Recent cases on which Mr. Varga has worked include:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation,* a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation, as counsel for lead plaintiff and other shareholders, in a derivative action brought against members of the Board of Directors and senior executives of Pfizer, Inc. Plaintiffs made a breach of fiduciary duty claim because defendants allegedly allowed unlawful promotion of drugs to continue even after receiving numerous "red flags" that the improper drug marketing was systemic. Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters;

- Representation of a group of Singapore-based investors in a securities class action against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. Plaintiffs allege that Morgan Stanley routed Pinnacle investors' principal into synthetic collateralized debt obligations (CDOs) that it built to fail and then bet against. As the CDOs failed by design, plaintiffs' principal was swapped to Morgan Stanley, enriching Morgan Stanley while rendering the Pinnacle Notes an all-but-total loss. This case settled for $20 million;

- Representation of companies that offered IPO securities in antitrust litigation against the 27 largest investment banks in the United States. Plaintiffs allege that the banks conspired to price fix underwriting fees in the mid-sized IPO market; and

- Representation of the NY State Common Retirement Fund as lead plaintiff in *In re National City Corporation Securities, Derivative & ERISA Litigation,* a securities class action arising from National City's alleged misrepresentations regarding exposure to subprime mortgage related losses. This case settled for $168 million.

Mr. Varga is admitted to the New York State Bar, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second Circuit. He graduated from Cornell University (B.S., 2000)) and from New York University Law School (J.D., 2006).

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Elizabeth A. Brehm is an associate who concentrates on antitrust and securities litigation. Ms. Brehm joined the firm in 2011. Prior to her time at KM, Ms. Brehm practiced as an attorney in the New York office of Winston & Strawn LLP.

Recent cases on which Ms. Brehm has worked include:

- Representation of indirect purchasers in *In re Cathode Ray Tube (CRT) Antitrust Litigation*, a price fixing anti-trust case wherein it is alleged that defendant entities conspired to control prices of television and monitor components;

- Representation, as lead counsel, of consumer classes in connection with antitrust proceedings against Microsoft in the United States and Canada. So far, these litigations have resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial;

- *In re Ductile Iron Pipe Fittings Antitrust Litigation*, MDL No. 2347 (D. NJ. 2012). Co-lead counsel on behalf of a proposed class of purchasers of iron pipe fittings for water projects. Class representatives include Wayne County, Michigan; and

- Representation, in an individual lawsuit against Morgan Stanley pertaining to four fraudulent collateralized debt obligations. Plaintiff alleges that Morgan Stanley represented that independent collateral managers would select safe, high-quality reference entities to be included in the collateralized debt obligations' underlying portfolios, but that in reality, Morgan Stanley controlled portfolio selection and chose high-risk collateral, while actively shorting that same collateral in order to enrich itself at its client's expense.

During her time at Winston & Strawn, Ms. Brehm focused on products liability litigation, including *Estate of Bobby Hill v. U.S. Smokeless Tobacco Co.*, a wrongful death products liability lawsuit brought by the family of Bobby Hill against Altria Group, which had recently acquired U.S. Smokeless Tobacco Co. The lawsuit asserted that U.S. Smokeless Tobacco manufactured and sold smokeless tobacco that Bobby Hill began using when he was 13-years-old and that this led to the death of Mr. Hill at age 42 from tongue cancer. The case settled prior to trial.

Ms. Brehm is admitted to the New York State Bar. She graduated from Boston University (B.A., 2001), Long Island University (M.S. Edu., 2004), and from Hofstra School of Law *magna cum laude* (J.D., 2008).



Fatima Brizuela is an associate based in our California office who concentrates on antitrust matters. Ms. Brizuela joined the firm in 2015.

Currently, Ms. Brizuela works on the following cases:

- Representation of businesses and consumers in indirect purchase class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly; and

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm.

In addition, Ms. Brizuela assists senior attorneys with drafting briefs and motions, legal memoranda and research on various securities and antitrust litigation.

Ms. Brizuela graduated from Rutgers University (B.A. *summa cum laude* 2009) and California Western School of Law (J.D. 2015). She is admitted to the New York State Bar and is a member of the San Diego County Bar Association.



Thomas W. Elrod is an associate based in our New York office focusing on securities, commodities, antitrust and whistleblower litigation. Mr. Elrod joined the firm in 2011.

Recent cases on which Mr. Elrod has worked include:

- *In re Citigroup Inc. Securities Litigation*, a class action, in which Kirby McInerney served as lead counsel, arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor Rates. This litigation is ongoing;

- Representation, as lead counsel on behalf of a proposed class of futures traders in *In re North Sea Brent Crude Oil Futures Litig.*, alleging benchmark manipulation. This litigation is ongoing;

- Representation, as co-lead counsel, of a proposed class of natural gas traders in a class action lawsuit against Total Gas & Power North America, Inc. (TGPNA) alleging price manipulation of physical natural gas as well as price manipulation of natural gas futures and other derivative natural gas contracts. This litigation is ongoing;

- Representation of municipal issuers of Auction Rate Securities in FINRA arbitrations alleging misrepresentations by underwriters;

- Representation, as lead counsel, in *In re Hi-Crush Partners L.P. Securities Litigation*, alleging that fracking sand producer Hi-Crush Partners misled shareholders prior to its initial public offering. This case resulted in a $3.8 million settlement while class certification was pending;

- Representation of a nationwide class of residential mortgage loan borrowers in *Rothstein v. GMAC Mortgage LLC*, a class action alleging violations of the Racketeer Influence and Corrupt Organizations Act. This litigation resulted in a $13 million settlement against GMAC Mortgage; and

- Representation of whistleblowers who claim that their companies have violated federal law or defrauded the United States Government.

Mr. Elrod is admitted to the New York State Bar, the New Jersey State Bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States District Court for the District of New Jersey, and the United States Courts of Appeals for the 2nd and 9th Circuits. He graduated from the University of Chicago (B.A., 2005) and from the Boston University School of Law (J.D., 2009).

Mr. Elrod is admitted to the New York State Bar, the New Jersey State Bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States District Court for the District of New Jersey, and the United States Courts of Appeals for the 2nd and 9th Circuits. He graduated from the University of Chicago (B.A., 2005) and from the Boston University School of Law (J.D., 2009).



Karina Kosharskyy is an associate based in our New York office focusing on antitrust and securities litigation. Ms. Kosharskyy joined the firm in 2005.

Recent cases on which Ms. Kosharskyy has worked include:

- Representation of an end-user class of businesses and consumers in connection with *In Re: Cathode Ray Tube (CRT) Antitrust Litigation.* In this case, the manufacturers of cathode ray tubes conspired to fix, raise, maintain and/or stabilize prices. Because of Defendants' alleged unlawful conduct, Plaintiffs and other Class Members paid artificially inflated prices for CRT Products and have suffered financial harm;

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates;

- Representation of a class of consumers in connection with *In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions.* This case involves Unocal's manipulation of the standard-setting process for low-emissions reformulated gasoline in California, which increased retail prices of reformulated gasoline. The court recently approved a preliminary settlement of $48 million in this litigation; and

- Representation of consumer classes in connection with antitrust proceedings against Microsoft. These litigations resulted in settlements totaling nearly a billion dollars for consumers in Florida, New York, Tennessee, West Virginia and Minnesota, where the litigation proceeded to trial.

Ms. Kosharskyy is admitted to the New York State Bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States District Court for the District of New Jersey, and the New Jersey State Bar. She graduated from Boston University (B.A., 2000) and from New York Law School (J.D., 2007). She is fluent in Russian.

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Anthony E. Maneiro is an associate based in our New York office who concentrates on securities, commodities and antitrust matters. Mr. Maneiro joined the firm in 2016.

Currently, Mr. Maneiro is assisting on the following cases:

- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates;

- Representation of exchange-based investors in U.S. treasury futures and options, alleging that defendants colluded to manipulate the price of Treasury Securities prior to Treasury Auctions; and

- Representation of exchange-based investors, alleging price manipulation of physical natural gas as well as price manipulation of natural gas futures and other derivative natural gas contracts.

In addition, Mr. Maneiro assists senior attorneys with drafting briefs and motions, legal memoranda and research.

Mr. Maneiro has passed the Massachusetts State Bar (admission pending). He graduated from Grove City College (B.A. 2010, *magna cum laude*), London School of Economics and Political Science (MSc 2011) and Boston University School of Law (J.D., LL.M. 2016).



Meghan Summers is an associate based in our New York office focusing on securities, structured finance, and antitrust litigation. Ms. Summers previously worked at the firm as a paralegal and law clerk before joining the firm in September 2012 as an associate.

Ms. Summers has recently worked on the following cases:

- Representation of a group of Singapore-based investors in a securities class action against Morgan Stanley pertaining to notes issued by Cayman Islands-registered Pinnacle Performance Ltd. Plaintiffs allege that Morgan Stanley routed Pinnacle investors' principal into synthetic collateralized debt obligations (CDOs) that it built to fail and then bet against. As the CDOs failed by design, plaintiffs' principal was swapped to Morgan Stanley, enriching Morgan Stanley while rendering the Pinnacle Notes an all-but-total loss. This case settled for $20 million;

- An individual lawsuit against Morgan Stanley pertaining to four fraudulent collateralized debt obligations. Plaintiff alleges that Morgan Stanley represented that independent collateral managers would select safe, high-quality reference entities to be included in the collateralized debt obligations' underlying portfolios, but that in reality, Morgan Stanley controlled portfolio selection and chose high-risk collateral, while actively shorting that same collateral in order to enrich itself at its client's expense;

- Individual lawsuits against Morgan Stanley, Credit Agricole Corporate and Investment Bank, UBS, Deutsche Bank, Credit Suisse, Goldman Sachs, JP Morgan, and Barclays pertaining to a number of fraudulent structured investment vehicles and asset-backed collateralized debt obligations;

- An individual securities fraud action against BP plc related to the Deepwater Horizon explosion on April 20, 2010, and the subsequent drop in BP's share price; and

- Individual securities fraud actions against Merck and Schering-Plough related to the commercial viability of the companies' anti-cholesterol medication Vytorin, and the subsequent drop in Merck's and Schering-Plough's share price.

- *In re MOL Global Inc. Securities Litigation*, a class action lawsuit alleging that e-payment enabler MOL Global misled shareholders prior to its initial public offering.

As a law clerk, Ms. Summers worked on a variety of matters including *In re Citigroup Inc. Securities Litigation, In re Wachovia Corporation, In re Libor-Based Financial Instruments Antitrust Litigation, Dandong v. Pinnacle Performance Limited*, and private antitrust proceedings against Microsoft in the United States and Canada.

Ms. Summers is admitted to the New York State Bar, the United States District Courts for the Southern and Eastern Districts of New York, the United States District Court for the District of Colorado, and the United States Court of Appeals for the 3rd Circuit. She graduated from Cornell University *summa cum laude* where she was ranked first in her major (B.S., 2008) and from Pace University School of Law *summa cum laude* where she was Salutatorian of her class (J.D., 2012).



Ayako Mikuriya is a staff attorney focusing on securities and structured finance litigation. Ms. Mikuriya joined the firm in 2013.

Recent cases on which Ms. Mikuriya has worked include:

- Securities and structured product litigations on behalf of clients across Asia.

Prior to joining KM, Ms. Mikuriya worked as a Vice President in the legal department of Nomura Holding America Inc. She has passed the qualification examination for Sales Representatives licensed by the Japan Securities Dealers Associations.

Ms. Mikuriya is admitted to the New York State Bar. She graduated from the Sophia University in Tokyo, Japan (B.A., 2003), and from Columbia University School of Law (LL.M., 2010). She is fluent in English and is a native speaker of Japanese.



Parul Sharma is a staff attorney based in our New York office who concentrates on antitrust matters. Ms. Sharma joined the firm in 2016.

Currently, Ms. Sharma works on the following cases:

- Representation of businesses and consumers in indirect purchase class actions throughout the country against Microsoft for overcharging for its products as a result of its unlawful monopoly; and
- Representation of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates.

In addition, Mr. Sharma assists senior attorneys with drafting pleadings and motions, legal memoranda and research.

Ms. Sharma graduated from the University of Ottawa Telfer School of Management (Honors Bachelor of Commerce 2008) and Seton Hall University School of Law (J.D. 2014). She is admitted to the New York State Bar.

Prior to joining KM, Ms. Sharma was an associate at Jaffe & Asher in their Creditors Rights practice.

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Andrew Watt is a staff attorney based in our New York office focusing on securities and antitrust litigation. Mr. Watt worked at the firm as an associate from 2005 through 2008. He then returned to work with the firm as a staff attorney in 2010.

Recent cases on which Mr. Watt has worked include:

- Representation of the lead plaintiff in *In re Citigroup Inc Securities Litigation*, a class action arising out of Citigroup's alleged misrepresentations regarding their exposure to losses associated with numerous collateralized debt obligations. This case settled for $590 million;

- Representation, as co-lead counsel, of exchange-based investors in futures, swaps, and other Libor-based derivative products, alleging that defendant banks colluded to misreport and manipulate Libor rates; and

- Representation of a class of direct purchasers of Prograf, a branded prescription immunosuppressant used in organ transplant patients in an antitrust action against Astellas Pharma US, Inc. Plaintiffs allege that defendant filed a baseless citizen petition with the Food and Drug Administration ("FDA"), with the sole intent of foreclosing market entry by generic competitors, that improperly extended its monopoly and kept Prograf prices at supra-competitive levels.

Mr. Watt is admitted to the New York State Bar and the United States District Courts for the Southern and Eastern Districts of New York. He graduated from Columbia College (B.A., 1994), Yale University (M.A., 1999), and Columbia University School of Law (J.D., 2002), where he was a Harlan Fiske Stone Scholar.

Prior to joining KM, Mr. Watt practiced at Roberts & Holland, LLP.

Client & Adversary Recognition

KM received the highest available commendations from the City of NY four years in a row for its work on the AWP Litigation. In each of those four years, KM's efforts on the City's behalf received the overall rating of "excellent". The City elaborated, "*Kirby did a truly excellent job and the results reflect that*".

"The case has been in front of the Supreme Court of the United States once, and in front of the Ninth Circuit no fewer than three times. Throughout, [KM] has . . . brought a considerable degree of success . . . and thwarted attempts by other counsel who sought to settle . . . and destroy a potential billion dollars of class rights."

Plaintiff / client,
Epstein v. MCA, Inc.

"[The KM firm] proved to be a highly able and articulate advocate. Single-handedly, [KM] was able to demonstrate not only that [KM's] client had a good case but that many of the suspicions and objections held by the Nigerian Government were ill-founded."

English adversary in The Nigerian Cement Scandal

"[KM] represented us diligently and successfully. Throughout [KM's] representation of our firm, [KM's] commitment and attention to client concerns were unimpeachable."

European institutional defendant /client
involved in a multi-million dollar NASD arbitration

"Against long odds, [KM] was able to obtain a jury verdict against one of the larger, more prestigious New York law firms."

Plaintiff / client,
Vladimir v. U.S. Banknote Corporation

"[KM] represented our investors with probity, skill, and diligence. There is too much money involved in these situations to leave selection of class counsel to strangers or even to other institutions whose interests may not coincide."

Plaintiff / institutional client,
In re Cendant Corporation PRIDES Litigation

Notables

The firm has repeatedly demonstrated its ability in the field of class litigation and our success has been widely recognized. For example:

Rothstein v. GMAC Mortgage LLC, No. 12-cv-3412 (S.D.N.Y.). Lead counsel. $13 million settlement against GMAC Mortgage LLC in *In re Residential Capital, LLC, et al*., No. 12-12020 (Bankr. S.D.N.Y. 2016).

Globis Capital Partners, L.P., et al. v. The Cash Store Financial Services Inc., et al., No. 13-cv-3385 (S.D.N.Y. 2015): Co-lead counsel. CAD $13,779,167 cash settlement, representing roughly 50% of total class-wide stock losses.

Dandong v. Pinnacle Performance Ltd., No. 10-cv-08086 (S.D.N.Y. 2015). Lead counsel. $20 million settlement.

In re Hi-Crush Partners L.P. Securities Litigation, No. 12-cv-8557 (S.D.N.Y. 2015). Lead counsel. $3.8 million settlement while class certification was pending.

In re Citigroup Inc. Securities Litigation, No. 07-cv-9901 (S.D.N.Y. 2013). Lead counsel. $590 million settlement.

Barfuss v. DGSE Companies, Inc., No. 12-cv-3664 (N.D. Tex. 2013). Lead Counsel. $1.7 million settlement.

In re National City Corporation Securities, Derivative & ERISA Litigation, No. 08-cv-70004 (N.D. Ohio 2012). Lead counsel. $168 million settlement.

In re Wachovia Equity Securities Litigation, No. 08-cv-6171 (S.D.N.Y. 2012). Lead counsel. $75 million settlement.

In re BP Propane Indirect Purchaser Antitrust Litigation, No. 06-cv-3541 (N.D.Ill. 2010). Co-lead counsel. $15 million settlement on behalf of propane purchasers.

In re J.P. Morgan Chase Cash Balance Litigation, No. 06-cv-732 (S.D.N.Y. 2010). Co-lead counsel.

> "Plaintiff's counsel operated with a strong, genuine belief that they were litigating on behalf of a group of employees who had been injured and who needed representation and a voice, and, at great expense to [themselves], made Herculean efforts on behalf of the class over years…they're to be commended for their fight on behalf of people that they believed had been victimized."

In re Pfizer Inc. Shareholder Derivative Litigation, No. 09-cv-7822 (S.D.N.Y.). Pfizer agreed to pay a proposed settlement of $75 million and to make groundbreaking changes to the Board's oversight of regulatory matters.

In re Pharmaceutical Industry Average Wholesale Price Litigation, MDL No. 1456; *City of New York, et al. v. Abbott Laboratories, et al.*, No. 01 Civ. 12257 (D. Mass). KM represented the State of Iowa, the City of New York, and forty-two New York State counties in a lawsuit against forty defendant drug manufacturers

asserting that they manipulated their average wholesale price data to inflate prices charged to government drug benefits payers. Recovery of over $225 million for the plaintiffs.

In re Reformulated Gasoline (RFG) Antitrust and Patent Litigation and Related Actions, No. 05-cv-01671 (C.D. Cal). Lead counsel. $48 million settlement for indirect purchasers.

In re BISYS Securities Litigation, No. 04-cv-3840 (S.D.N.Y. 2007). Co-lead counsel. $66 million settlement.

> "In this Court's experience, relatively few cases have involved as high level of risk, as extensive discovery, and, most importantly, as positive a final result for the class members as that obtained in this case."

Cox v. Microsoft Corporation, Index No. 105193/00, Part 3 (N.Y. Sup. Ct.). Lead counsel. $350 million settlement.

In re AT&T Corp. Securities Litigation, No. 00-cv-8754 (S.D.N.Y. 2006). Lead counsel. $150 million settlement.

In re Adelphia Communications, Inc. Securities Litigation, No. 04-cv-05759 (S.D.N.Y. 2006). Co-lead counsel. $478 million settlement.

> "[T]hat the settlements were obtained from defendants represented by 'formidable opposing counsel from some of the best defense firms in the country' also evidences the high quality of lead counsels' work."

Lapin v. Goldman Sachs & Co., No. 04-cv-2236 (S.D.N.Y.). Co-lead counsel. $29 million settlement.

Montoya v. Herley Industries, Inc., No. 06-cv-2596 (E.D. Pa). Lead counsel. $10 million settlement.

Carnegie v. Household International Inc., et al., No. 98-cv-2178 (N.D.Ill. 2006). Co-lead counsel. $39 million settlement.

> "Since counsel took over the representation of this case . . ., they have pursued this case, conducting discovery, hiring experts, preparing for trial, filing motions where necessary, opposing many motions, and representing the class with intelligence and hard work. They have obtained an excellent result for the class."

Dutton v. Harris Stratex Networks Inc. et al., No. 08-cv-00755 (D.Del). Lead counsel. $8.9 million settlement.

In re Isologen Inc. Securities Litigation, No. 05-cv-4983 (E.D. Pa.). Lead counsel. $4.4 million settlement.

In re Textron, Inc. Securities Litigation, No. 02-cv-0190 (D.R.I.). Co-lead counsel. $7 million settlement.

Argent Convertible Classic Arbitrage Fund, L.P. v. Amazon.com, Inc. et al., No. 01-cv-0640L (W.D. Wash. 2005). Lead counsel. $20 million settlement for class of convertible euro-denominated bond purchasers.

Muzinich & Co., Inc. et al. v. Raytheon Company et al., No. 01-cv-0284 (D. Idaho 2005). Co-lead counsel. $39 million settlement.

Gordon v. Microsoft Corporation, No. 00-cv-5994 (Minn. Dist. Ct., Henn. Cnty. 2004). Co-lead counsel. $175 million settlement following two months of trial.

In re Visa Check/MasterMoney Antitrust Litigation, No. 96-cv-5238 (E.D.N.Y. 2003). $3 billion monetary settlement and injunctive relief.

In re Florida Microsoft Antitrust Litigation, No. 99-cv-27340 (Fl. Cir. Ct. 11th Cir., Miami/Dade Cnty. 2003). Co-lead counsel. $200 million settlement of antitrust claims.

In re Churchill Securities, Inc. (SIPA Proceeding), No. 99 B 5346A (Bankr. S.D.N.Y. 2003). Lead counsel. Over $9 million recovery for 500+ victims of pyramid scheme perpetrated by defunct brokerage firm.

In re Laidlaw Bondholder Securities Litigation, No. 00-cv-2518-17 (D. S.C. 2002). Lead counsel. $42.8 million settlement.

Cromer Finance v. Berger et al. (*In re Manhattan Fund Securities Litigatio*n), No. 00-cv-2284 (S.D.N.Y. 2002). Co-lead counsel. $65 million settlement in total.

In re Boeing Securities Litigation, No. 97-cv-715 (W.D. Wash. 2001). $92.5 million settlement.

In re MCI Non-Subscriber Telephone Rates Litigation, MDL No. 1275 (S.D. Ill. 2001). Chairman of steering committee. $88 million settlement.

In re General Instrument Corp. Securities Litigation, No. 01-cv-1351 (E.D. Pa. 2001). Co-lead counsel. $48 million settlement.

In re Bergen Brunswig/Bergen Capital Trust Securities Litigation, 99-cv-1305 and 99-cv-1462 (C.D. Cal. 2001). Co-lead counsel. $42 million settlement.

Steiner v. Aurora Foods, No. 00-cv-602 (N.D. Cal. 2000). Co-lead counsel. $36 million settlement.

Gerber v. Computer Associates International, Inc., No. 91-cv-3610 (E.D.N.Y. 2000). Multi-million dollar jury verdict in securities class action.

Rothman v. Gregor, 220 F.3d 81 (2d Cir. 2000). Principal counsel of record in appeal that resulted in first ever appellate reversal of the dismissal of a securities fraud class action under the Securities Reform Act of 1995.

Bartold v. Glendale Federal Bank, 81 Cal.App.4th 816 (2000). Ruling on behalf of hundreds of thousands of California homeowners establishing banks' duties regarding title reconveyance.

In re Cendant Corporation PRIDES Litigation, 51 F. Supp. 2d 537, 542 (D. N.J. 1999). Lead counsel. $340 million settlement.

> "[R]esolution of this matter was greatly accelerated by the creative dynamism of counsel." * * * "We have seen the gifted execution of responsibilities by a lead counsel."

In re Waste Management, Inc. Securities Litigation, No. 97C 7709 (N.D. Ill. 1999). Co-lead counsel. $220 million settlement.

> "...[Y]ou have acted the way lawyers at their best ought to act. And I have had a lot of cases... in 15 years now as a judge and I cannot recall a significant case where I felt people were better represented than they are here... I would say this has been the best representation that I have seen."

In re Bennett Funding Group, Inc. Securities Litigation, No. 96-cv-2583 (S.D.N.Y. 1999). Co-lead counsel. $140 million settlement ($125 million recovered from Generali U.S. Branch, insurer of Ponzi scheme instruments issued by Bennett Funding Group; $14 million settlement with Mahoney Cohen, Bennett's auditor).

In re MedPartners Securities Litigation, No. 98-cv-06364 (Ala. June 1999). Co-lead counsel. $56 million settlement.

In re MTC Electronic Technologies Shareholder Litigation, No. 93-cv-0876 (E.D.N.Y. 1998). Co-lead counsel. Settlement in excess of $70 million.

Skouras v. Creditanstalt International Advisers, Inc., et al., NASD Arb., No. 96-05847 (1998). Following an approximately one month hearing, successfully defeated multi-million dollar claim against major European institution.

In re Woolworth Corp. Securities Class Action Litigation, No. 94-cv-2217 (S.D.N.Y. 1997). Co-lead counsel. $20 million settlement.

In re Archer Daniels Midland Inc. Securities Litigation, No. 95-cv-2877 (C.D. Ill. 1997). Co-lead counsel. $30 million settlement.

Vladimir v. U.S. Banknote Corp., No. 94-cv-0255 (S.D.N.Y. 1997). Multi-million dollar jury verdict in § 10(b) action.

In re Archer Daniels Midland Inc. Securities Litigation, No. 95-cv-2877 (C. D. Ill. 1997). Co-lead counsel. $30 million settlement.

Epstein et al. v. MCA, Inc., et al., 50 F.3d 644 (9th Cir. 1995), *rev'd and remanded on other grounds, Matsushita Electric Industrial Co., Ltd. et al. v. Epstein et al.*, No. 94-1809, 116 S. Ct. 873 (February 27, 1996). Lead counsel. Appeal resulted in landmark decision concerning liability of tender offeror under section 14(d)(7) of the Williams Act, SEC Rule 14d-10 and preclusive effect of a release in a state court proceeding. In its decision granting partial summary judgment to plaintiffs, the court of appeals for the Ninth Circuit stated:

> "The record shows that the performance of the Epstein plaintiffs and their counsel in pursuing this litigation has been exemplary."

In re Abbott Laboratories Shareholder Litigation, No. 92-cv-3869 (N.D. Ill. 1995). Co-lead counsel. $32.5 million settlement.

> "The record here amply demonstrates the superior quality of plaintiffs' counsel's preparation, work product, and general ability before the court."

In re Morrison Knudsen Securities Litigation, No. 94-cv-334 (D. Id. 1995). Co-lead counsel. $68 million settlement.

In re T2 Medical Inc. Securities Litigation, No. 94-cv-744 (N.D. Ga. 1995). Co-lead counsel. $50 million settlement.

Gelb v. AT&T, No. 90-cv-7212 (S.D.N.Y. 1994). Landmark decision regarding filed rate doctrine leading to injunctive relief.

In re International Technology Corporation Securities Litigation, No. 88-cv-40 (C.D. Cal. 1993). Co-lead counsel. $13 million settlement.

Colaprico v. Sun Microsystems, No. 90-cv-20710 (N.D. Cal. 1993). Co-lead counsel. $5 million settlement.

Steinfink v. Pitney Bowes, Inc., No. B90-340 (JAC) (D. Conn. 1993). Lead counsel. $4 million settlement.

In re Jackpot Securities Enterprises, Inc. Securities Litigation, No. CV-S-89-05-LDG (D. Nev. 1993). Lead counsel. $3 million settlement.

In re Nordstrom Inc. Securities Litigation, No. C90-295C (W.D. Wa. 1991). Co-lead counsel. $7.5 million settlement.

United Artists Litigation, No. CA 980 (Sup. Ct., L.A., Cal.). Trial counsel. $35 million settlement.

In re A.L. Williams Corp. Shareholders Litigation, C.A. No. 10881 (Delaware Ch. 1990). Lead counsel. Benefits in excess of $11 million.

In re Triangle Inds., Inc., Shareholders' Litigation, C.A. No. 10466 (Delaware Ch. 1990). Co-lead counsel. Recovery in excess of $70 million.

Schneider v. Lazard Freres, No. 38899, M-6679 (N.Y. App. Div. 1st Dept. 1990). Co-lead counsel. Landmark decision concerning liability of investment bankers in corporate buyouts. $55 million settlement.

Rothenberg v. A.L. Williams, C.A. No. 10060 (Delaware. Ch. 1989). Lead counsel. Benefits of at least $25 million to the class.

Kantor v. Zondervan Corporation, No. 88-cv-C5425 (W.D. Mich. 1989). Lead counsel. Recovery of $3.75 million.

King v. Advanced Systems, Inc., No. 84-cv-C10917 (N.D. Ill. E.D. 1988). Lead counsel. Recovery of $3.9 million (representing 90% of damages).

Straetz v. Cordis, No. 85-cv-343 (S.D. Fla. 1988). Lead counsel.

> "I want to commend counsel and each one of you for the diligence with which you've pursued the case and for the results that have been produced on both sides. I think that you have displayed the absolute optimum in the method and manner by which you have represented your respective clients, and you are indeed a credit to the legal profession, and I'm very proud to have had the opportunity to have you appear before the Court in this matter."

In re Flexi-Van Corporation, Inc. Shareholders Litigation, C.A. No. 9672 (Delaware. Ch. 1988). Co-lead counsel. $18.4 million settlement.

Entezed, Inc. v. Republic of Nigeria, I.C.C. Arb. (London 1987). Multi-million dollar award for client.

In re Carnation Company Securities Litigation, No. 84-cv-6913 (C.D. Cal. 1987). Co-lead counsel. $13 million settlement.

In re Data Switch Securities Litigation, B84 585 (RCZ) (D. Conn. 1985). Co-lead counsel. $7.5 million settlement.

Stern v. Steans, No. 80-cv-3903. The court characterized the result for the class obtained during trial to jury as "unusually successful" and "incredible" (Jun 1, 1984).

In re Datapoint Securities Litigation, No. 82-cv-338 (W.D. Tex.). Lead counsel for a Sub-Class. $22.5 million aggregate settlement.

Malchman, et al. v. Davis, et al., No. 77-cv-5151 (S.D.N.Y. 1984):

> "It is difficult to overstate the far-reaching results of this litigation and the settlement. Few class actions have ever succeeded in altering commercial relationships of such magnitude. Few class action settlements have even approached the results achieved herein.... In the present case, the attorneys representing the class have acted with outstanding vigor and dedication . . . Although the lawyers in this litigation have appeared considerably more in the state courts than in the federal court, they have appeared in the federal court sufficiently for me to attest as to the high professional character of their work. Every issue which has come to this court has been presented by both sides with a thoroughness and zeal which is outstanding .... In sum, plaintiffs and their attorneys undertook a very large and difficult litigation in both the state and federal courts, where the stakes were enormous. This litigation was hard fought over a period of four years. Plaintiffs achieved a settlement which altered commercial relationships involving literally hundreds of millions of dollars."

* * *

EXHIBIT B

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

Firm Name: Kirby McInerney LLP **Reporting Period: From June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

(P) Partner
(OC) Of Counsel
(A) Associate
(PL) Paralegal
(L) Librarian

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATES	TOTAL LODESTAR
Robert Gralewski (P) - **Capped**							88.40								88.40	$350.00	$ 30,940.00
Robert Gralewski (P)									1.20		9.30			0.90	11.40	$810.00	$ 9,234.00
Ayako Mikuriya (A) - **Capped**							169.10								169.10	$450.00	$ 76,095.00
Sawaka Nagano (OC)		14.20		117.70											131.90	$575.00	$ 75,842.50
Sawaka Nagano (OC) - **Capped**			-				3,355.40								3,355.40	$450.00	$ 1,509,930.00
William Harris (OC) **- Capped**							247.00								247.00	$350.00	$ 86,450.00
SUB-TOTAL	-	14.20	-	117.70	-	-	3,859.90	-	1.20	-	9.30	-	-	0.90	4,003.20		$ 1,788,491.50
GRAND TOTAL:	**-**	**14.20**	**-**	**117.70**	**-**	**-**	**3,859.90**	**-**	**1.20**	**-**	**9.30**	**-**	**-**	**0.90**	**4,003.20**		**$ 1,788,491.50**

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

KIRBY MCINERNEY LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Robert Gralewski (P)	2013 Capped	$350.00
Robert Gralewski (P)	2014 Capped	$350.00
Robert Gralewski (P)	2014	$775.00
Robert Gralewski (P)	2015 Capped	$350.00
Robert Gralewski (P)	2015	$775.00
Robert Gralewski (P)	2016 Capped	$350.00
Robert Gralewski (P)	2016	$800.00
Robert Gralewski (P)	2017 Capped	$350.00
Robert Gralewski (P)	2017	$810.00
Ayako Mikuriya (A)	2014 - Capped	$450.00
Sawaka Nagano (OC)	2014 - Capped	$450.00
Sawaka Nagano (OC)	2015 - Capped	$450.00
Sawaka Nagano (OC)	2015	$575.00
Sawaka Nagano (OC)	2016 - Capped	$450.00
Sawaka Nagano (OC)	2016	$575.00
Sawaka Nagano (OC)	2017 Capped	$450.00
William Harris (OC)	2014 - Capped	$350.00
William Harris (OC)	2015 - Capped	$350.00

EXHIBIT D

(REDACTED)

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Contemporaneous Time Records
June 1, 2013 through February 28, 2017

Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
Robert Gralewski	7/30/2013	$350.00	0.5	7	Telephone call with Hume regarding status of case, discovery stay, and utilizing Japanese lawyer to review initial production (0.3); emails with Hume and Stellings regarding conference call to discuss same (0.1); follow up with Hume regarding requesting assignment to assist with plaintiff discovery matters (0.1)
Robert Gralewski	12/9/2013	$350.00	0.1	7	Follow up with Stellings regarding [redacted] KM's ability to provide Japanese reviewer to review same
Robert Gralewski	12/10/2013	$350.00	0.1	7	Forward consolidated amended complaint to Harris with instructions and information pertaining to upcoming training and document review
Robert Gralewski	1/23/2014	$775.00	0.3	9	Review Order on MTD (0.3); telephone call with Anderson regarding work assignments and same Order (0.1);
		$775.00	0.1		
Robert Gralewski	3/4/2014	$350.00	0.5	7	Emails with Anderson regarding status and Japanese reviewers (0.2); follow up with Hume regarding providing Japanese document review assistance (0.3)
Robert Gralewski	3/5/2014	$350.00	1.5	7	Numerous emails with lead counsel and KM attorneys regarding staffing (1.2); telephone with Cihlar and Bogdanov regarding same (0.3)
Robert Gralewski	3/6/2014	$350.00	0.7	7	Emails with lead counsel, Moy, and Nagano regarding training for Japanese review and related issues (0.5); follow up (0.2)
Robert Gralewski	3/7/2014	$350.00	0.5	7	Emails with Nagano regarding training/initiation of review/coding project (0.2); track emails regarding same and follow up with lead counsel (0.2); report to Hume (0.1)
Robert Gralewski	3/17/2014	$350.00	0.2	7	Emails with Nagano regarding Batteries review and related issues
Robert Gralewski	3/19/2014	$350.00	0.5	7	Confer with Cihlar, Kim-Helms, and Moy regarding status of review and related issues
Robert Gralewski	3/20/2014	$350.00	0.5	7	Emails with Nagano, Mikuriya, Hume, and Studebaker regarding document review, projects, conflicts, and coordination of same
Robert Gralewski	3/21/2014	$350.00	0.5	7	Emails with Nagano regarding document review and assignments (0.3); follow up with Hume and Telias regarding administrative issues pertaining to Nagano (0.2)
Robert Gralewski	3/22/2014	$350.00	0.2	7	Review email from Nagano regarding her assignment and status of review and follow up regarding same
Robert Gralewski	3/23/2014	$350.00	0.2	7	Emails with Nagano regarding document review
Robert Gralewski	3/26/2014	$350.00	0.5	7	Emails with Speigel and Nagano regarding projects and document review needs (0.2); follow up with Hume, Studebaker, Nagano, and Mikuriya regarding status of foreign language review and upcoming assignments (0.3)
Robert Gralewski	5/12/2014	$350.00	0.5	7	Emails and telephone with Speigel regarding status of case and document review and related issues (0.3); follow up with Nagano and Mikuriya regarding same (0.2)
Robert Gralewski	5/13/2014	$350.00	0.5	7	Discuss status of case and review with Kikuchi (0.3); emails with Nagano and Mikuriya regarding document review (0.2)
Robert Gralewski	5/20/2014	$350.00	0.2	7	Review email from Verducci and follow up with Nagano and Mikuriya regarding same and availability for document review
Robert Gralewski	5/21/2014	$350.00	0.7	7	Conference call with Nagano and Mikuriya regarding document review (0.4); emails with Studebaker and Hume regarding same (0.1); emails with Speigel regarding same (0.1); follow up on the review projects (0.1)
Robert Gralewski	5/22/2014	$350.00	0.6	7	Emails and telephone with Speigel regarding document review (0.5); follow up with Verducci regarding same (0.1);
Robert Gralewski	5/23/2014	$350.00	0.1	7	Emails with Verducci regarding document review
Robert Gralewski	5/28/2014	$350.00	0.5	7	Review and sign protective order and emails with Verducci regarding same (0.4); email with Nagano and Verducci regarding amended complaint (0.1)
Robert Gralewski	5/29/2014	$350.00	0.5	7	Emails with Verducci and Nagano regarding receiving copy of complaint (0.1); begin to review document review manual in anticipation/preparation for document review (0.4)
Robert Gralewski	6/5/2014	$350.00	0.5	7	Emails with Verducci and others regarding Catalyst training (0.2); follow up regarding same (0.3)
Robert Gralewski	6/6/2014	$350.00	0.2	7	Emails with Nagano regarding document review training
Robert Gralewski	6/9/2014	$350.00	0.2	7	Emails with Verducci and Speigel regarding document review training and coding instructions/update
Robert Gralewski	6/10/2014	$350.00	0.5	7	Configure system for review (0.2); emails and telephone call with Catalyst support regarding same (0.3)
Robert Gralewski	6/12/2014	$350.00	4	7	Review document review manual and related materials and prepare for 6/13/14 Catalyst training
Robert Gralewski	6/13/2014	$350.00	1	7	Attended a training session for Catalyst software program
Robert Gralewski	6/20/2014	$350.00	1	7	Conducted online T1 document review, specifically the assigned [redacted]
Robert Gralewski	6/23/2014	$350.00	3.5	7	Conducted online T1 document review, specifically the assigned [redacted]
Robert Gralewski	6/30/2014	$350.00	0.2	7	Emails with Mikuriya regarding document review and Japanese documents
Robert Gralewski	7/2/2014	$350.00	0.2	7	Emails with Spiegel and Verducci regarding document review and status of same
Robert Gralewski	7/3/2014	$350.00	1.8	7	Review notes from 7/1 conference call and supplemental coding manual materials (0.5); reviewed and coded documents [redacted] (1.1); follow up with Mikuriya regarding outstanding questions (0.2)
Robert Gralewski	7/18/2014	$350.00	1	7	Conducted online T1 document review, [redacted]
Robert Gralewski	7/21/2014	$350.00	1.2	7	Conducted online T1 document review, [redacted]
Robert Gralewski	7/24/2014	$350.00	0.5	7	Emails with Spiegel and Rim regarding [redacted] review [redacted] (0.2); began to review NEC documents [redacted] and copying helpful documents into a separate word document (0.3)

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Contemporaneous Time Records
June 1, 2013 through February 28, 2017

Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
Robert Gralewski	7/27/2014	$350.00	0.5	7	Review emails from Speigel and Rim regarding [redacted] project and digest same (0.2); review of documents referring to NEC [redacted] and copying helpful documents into a separate word document (0.3)
Robert Gralewski	7/28/2014	$350.00	1.5	7	Emails and telephone call with Rim regarding document review and strategic and technical questions related to same (0.3); review [redacted] documents [redacted] (1.2)
Robert Gralewski	7/29/2014	$775.00	0.7	14	Telephone with Speigel regarding hearing on motion to dismiss and various other matters related to case
Robert Gralewski	7/29/2014	$350.00	2	7	Telephone with Speigel regarding document review (0.1); telephone with Mikuriya regarding foreign language review and related issues (0.2); review [redacted] documents [redacted] (1.7)
Robert Gralewski	7/30/2014	$350.00	4	7	Review [redacted] documents [redacted] and copying helpful documents into a separate word document (4.0); emails with Spiegel, Rim, and others regarding potential hot documents and various review issues (0.2)
		$350.00	0.2	7	
Robert Gralewski	7/31/2014	$350.00	4	7	Review [redacted] documents [redacted] (3.4); emails with Mikuriya regarding document review-related issues, [redacted] (0.2); attempt to resolve technical issue with Catalyst (0.2); emails with Rim and telephone with Catalyst support regarding same (0.2)
Robert Gralewski	8/1/2014	$350.00	4	7	Review and code [redacted] documents [redacted] and copying helpful documents into a separate word document (3.7); emails with counsel regarding same including status, questions, handling of coding errors, and strategy (0.3)
Robert Gralewski	8/4/2014	$350.00	6.7	7	Review and code [redacted] documents [redacted] and copying helpful documents into a separate word document (6.1); emails with Rim and Spiegel regarding update and status of same, [redacted] (0.4); [redacted] (0.2)
Robert Gralewski	8/5/2014	$350.00	3.5	7	Review and code [redacted] documents [redacted] (3.4); emails with Rim and Land regarding review (0.1)
Robert Gralewski	8/6/2014	$350.00	7.5	7	Review and code [redacted] documents [redacted] and copying helpful documents into a separate word document (7.3); emails with Rim, Spiegel and Lang regarding same (0.2)
Robert Gralewski	8/7/2014	$350.00	6.7	7	Reveiw and code [redacted] documents [redacted] (2.0); edit and final memorandum [redacted] (4.5); emails with Rim, Speigel, and Lang regarding same (0.2)
Robert Gralewski	8/8/2014	$775.00	0.1	14	Emails with Spiegel regarding hearing on MTD
Robert Gralewski	8/11/2014	$775.00	0.1	14	Emails with Spiegel and Rim regarding MTD hearing [redacted]
Robert Gralewski	8/12/2014	$350.00	0.1	7	Emails with Spiegel and Rim regarding coding o[redacted] documents [redacted] and copying helpful documents into a separate word document
Robert Gralewski	8/13/2014	$350.00	0.2	7	Emails regarding instructions related to coding of the [redacted] documents (0.1); schedule conference call (0.1)
Robert Gralewski	8/14/2014	$350.00	0.2	7	Emails regarding Mikuriya and follow up (0.1); emails regarding schedule, projects, and [redacted] (0.1)
Robert Gralewski	8/23/2014	$350.00	0.2	7	Track matters regarding Mikuriya (0.1); follow up with Studebaker and Spiegel regarding same (0.1)
Robert Gralewski	8/25/2014	$350.00	0.8	7	Emails and telephone with Spiegel regarding Mikuriya and review/coding generally (0.5); follow up with Mikuriya regarding status of document review and memorandum summarizing same (0.3)
Robert Gralewski	8/27/2014	$350.00	0.8	7	Code [redacted] documents [redacted] (0.8)
Robert Gralewski		$350.00	0	7	
Robert Gralewski		$350.00	0	7	
Robert Gralewski	8/28/2014	$350.00	0.5	7	Coordinate Nagano's continued participation in high level review/corrections of Japanese documents during pause (0.4); emails with Nagano regarding same (0.1)
Robert Gralewski	9/26/2014	$350.00	1	7	Review email and attachments from Garcia regarding and in anticipation of restart of document review (0.9); follow up with Garcia regarding 9/30 conference call (0.1)
Robert Gralewski	9/29/2014	$350.00	0.1	7	Correspondence with Spiegel regarding Sony English batches and emails with Nagano regarding 9/30 conference call
Robert Gralewski	9/30/2014	$350.00	0.7	7	Participate in Conference Call led by Spiegel regarding re-starting review and coding (0.5); follow up (0.2)
Robert Gralewski	10/13/2014	$350.00	2.5	7	Review and code NEC documents [redacted] (2.1); emails with Spiegel and Rim [redacted] (0.2); follow up with Catalyst regarding technical support (0.2)
Robert Gralewski	10/21/2014	$350.00	0.1	7	Review summary report from Nagano on hot Japanese documents
Robert Gralewski	10/27/2014	$350.00	0.1	7	Emails with Nagano and leadership regarding 10/28/14 conference call

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Robert Gralewski	10/28/2014	$350.00	0.6	7	Prepare for and participate in Conference Call led by Spiegel regarding document review, coding instructions, and reminders (0.6)
Robert Gralewski	10/30/2014	$350.00	0.1	7	Emails with Nagano regarding conference call follow up
Robert Gralewski	11/18/2014	$350.00	0.6	7	Conference call with review/coding team (0.6)
Robert Gralewski	11/24/2014	$350.00	0.2	7	Emails regarding getting Harris set up to review/code (0.1); email with Harris regarding weekly conference calls (0.1)
Robert Gralewski	12/9/2014	$350.00	0.1	7	Emails with Harris regarding email distribution list associated with document review work
Robert Gralewski	12/16/2014	$350.00	0.1	7	Emails with Nagano regarding document review and time commitment
Robert Gralewski	1/5/2015	$350.00	0.1	7	Emails with Nagano regarding status of document review and projects
Robert Gralewski	1/8/2015	$350.00	0.2	7	Emails with Spiegel regarding status
Robert Gralewski	1/9/2015	$350.00	0.2	7	Telephone call with Speigel regarding status of discovery efforts
Robert Gralewski	1/23/2015	$350.00	0.2	7	Emails with Spiegel regarding status of document review (0.1); follow up with Harris (0.1)
Robert Gralewski	1/24/2015	$350.00	0.2	7	Emails with Harris and Nagano regarding status of document review
Robert Gralewski	1/26/2015	$350.00	0.2	7	Telephone call with Spiegel and emails with Spiegel, Harris and Nagano regarding document review, status of same, and time commitments
Robert Gralewski	1/29/2015	$350.00	0.2	7	Telephone call with Spiegel regarding status of review and Nagano (0.1); follow up with Nagano regarding same (0.1)
Robert Gralewski	2/10/2015	$350.00	0.1	7	Emails with Nagano regarding assignments of reviewing Japanese documents (0.10)
Robert Gralewski	2/14/2015	$350.00	0.2	7	Emails with Spiegel regarding need for assistance with Korean review (0.1); follow up with Cihlar regarding same (0.1)
Robert Gralewski	2/15/2015	$350.00	0.1	7	Follow up with Spiegel regarding document review and status of same
Robert Gralewski	3/9/2015	$350.00	0.1	7	Emails with Nagano regarding status of assignments (0.1)
Robert Gralewski	3/11/2015	$775.00	0.3	9	Coordinate with Fastiff and Glacken regarding 3/12 meeting (0.1); review motion to compel [redacted] (0.2);
Robert Gralewski	3/18/2015	$775.00	0.1	11	Texts and emails with Hume regarding update from lead counsel and assessment request (0.1); schedule call with Glackin (0.1); emails and telephone call with Nagano regarding work assignments and schedule (0.1)
Robert Gralewski		$775.00	0.1	11	
Robert Gralewski		$350.00	0.1	7	
Robert Gralewski	3/19/2015	$775.00	0.2	11	Follow up with Hume regarding assessment request (0.05); follow up with Studebaker regarding Nagano (0.05); follow up with Glackin regarding case update and assessment request (0.1)
Robert Gralewski	3/20/2015	$775.00	0.2	11	Telephone call with Glackin regarding status, outlook, and upcoming projects (0.2)
Robert Gralewski	4/1/2015	$350.00	0.1	7	Emails with Nagano regarding status of document review
Robert Gralewski	4/5/2015	$775.00	0.1	11	Emails with MCOM regarding status of case and assessment request
Robert Gralewski	4/16/2015	$775.00	0.1	11	Emails with Glackin regarding [redacted]
Robert Gralewski	4/27/2015	$775.00	0.7	11	Emails with Stellings, Glackin, Spiegel, and Cihlar regarding case and projects (0.4); report to MCOM on status of case and assessment request (0.3)
Robert Gralewski	4/28/2015	$775.00	0.2	11	Emails with Telias regarding assessment (0.1); follow up with Glackin regarding same (0.1)
Robert Gralewski	4/29/2015	$350.00	0.1	7	Emails with Nagano regarding status of projects and timeline to begin review again (0.1); follow up with Hume and Telias regarding assessment (0.1)
Robert Gralewski		$775.00	0.1	11	
Robert Gralewski	5/8/2015	$350.00	0.1	7	Emails with Spiegel regarding status of review
Robert Gralewski	5/18/2015	$350.00	0.3	7	Emails with Harris regarding document review (0.2); follow up with Lieff and Spiegel regarding same (0.1)
Robert Gralewski	5/19/2015	$350.00	0.1	7	Emails with Glackin, Harris, and Nagano regarding status of document review
Robert Gralewski	5/27/2015	$350.00	0.2	7	Review letter from Glackin regarding review re-commencing and follow up with Nagano regarding same
Robert Gralewski	5/29/2015	$350.00	0.1	7	Emails with Nagano and Glackin regarding document review (0.1)
Robert Gralewski	6/3/2015	$350.00	0.1	7	Check in with Nagano regarding re-starting of document review and substantive issues
Robert Gralewski	6/4/2015	$350.00	0.1	7	Emails with Nagano regarding re-starting of document review and contacting lead counsel regarding same
Robert Gralewski	6/7/2015	$350.00	0.1	7	Emails with Nagano regarding status of document review and timing of re-starting of same
Robert Gralewski	6/10/2015	$350.00	0.2	7	Emails with Nagano regarding delay in re-starting of review (0.1); email with Glackin regarding review and class representatives (0.1)
Robert Gralewski	6/11/2015	$350.00	0.2	7	Emails with Glackin, Pilotin, and Nagano regarding re-starting of document review
Robert Gralewski	6/12/2015	$350.00	0.1	7	Emails with Nagano regarding communication from Spiegel and re-starting of document review
Robert Gralewski	6/13/2015	$350.00	0.1	7	Emails with Spiegel and Nagano regarding status of document review and timing of re-starting of same
Robert Gralewski	6/15/2015	$350.00	0.1	7	Emails with Nagano regarding her review of the handbook and materials received from Spiegel
Robert Gralewski	6/17/2015	$350.00	0.1	7	Emails with Nagano regarding document review procedures
Robert Gralewski	6/18/2015	$350.00	0.1	7	Emails with Nagano regarding her initial project (Kubo deposition preparation) (.1)
Robert Gralewski	6/24/2015	$350.00	0.5	7	Telephone and emails with Nagano regarding document review and preparation for Kubo deposition and related matters
Robert Gralewski	6/30/2015	$350.00	0.1	7	Email with Nagano regarding 7/1 telephone meeting
Robert Gralewski	7/1/2015	$350.00	0.6	7	Telephone with Nagano regarding Kubo deposition, preparation for same, and status of review and search training (0.3); review Kubo Declaration and follow up with Nagano regarding same (0.2); email with Spiegel regarding check translator for Kubo deposition and follow up with Nagano regarding same (0.1)
Robert Gralewski	7/6/2015	$350.00	0.1	7	Emails with Nagano regarding weekly call to discuss document review and deposition preparation
Robert Gralewski	7/8/2015	$350.00	0.7	7	Telephone with Nagano (0.3); review draft background memo and speak with Nagano regarding suggestions for and comments to same (0.3); email with Glackin regarding check translator for Kubo deposition (0.1)
Robert Gralewski	8/4/2015	$775.00	0.1	11	Emails with Lambrinos regarding Nagano's work and her serving as check translator for upcoming Japanese depositions

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Robert Gralewski	8/5/2015	$775.00	0.2	11	Review written report from Nagano and telephone with Nagano regarding document review and deposition preparation to ensure expectations are being met and to answer any questions (0.1); emails with Lambrinos regarding Nagano serving as check translator and her efforts generally (0.1)
Robert Gralewski	9/2/2015	$350.00	0.1	7	Emails with Nagano regarding weekly teleconference regarding document review and [redacted] review
Robert Gralewski	9/16/2015	$350.00	0.2	7	Emails and telephone call with Nagano regarding current projects [redacted]
Robert Gralewski	9/23/2015	$775.00	0.2	9	Review joint letter-brief [redacted] (0.2); follow up and email with Glackin and Williams [redacted]
		$775.00	0.2	9	[redacted] (0.2); emails and telephone call with Nagano regarding expert project, translations, and deposition preparation (0.3)
		$775.00	0.3	11	
Robert Gralewski	9/29/2015	$350.00	0.2	11	Emails with Nagano regarding her serving as check translator for Fugumitsu deposition and planning/logistics for same (0.1); email with Nagano rescheduling weekly conference (0.1)
Robert Gralewski	10/1/2015	$350.00	0.7	7	Emails and telephone call with Nagano regarding status of review and related issues (0.5); emails with Glackin [redacted] (0.2)
Robert Gralewski	10/5/2015	$350.00	0.1	7	Emails with Williams and Glackin [redacted]
Robert Gralewski	10/9/2015	$350.00	0.2	7	Emails with Pilotin regarding Nagano's projects and balancing/splitting of same to ensure proper allocation of time and effort (0.1); coordinated with Nagano regarding same (0.1)
Robert Gralewski	10/15/2015	$350.00	0.1	7	Email and telephone call with Nagano regarding status of review and follow up with Pilotin regarding same (0.1)
Robert Gralewski	10/19/2015	$350.00	0.1	7	Email with Pilotin regarding Nagano work schedule
Robert Gralewski	10/21/2015	$350.00	0.2	7	Telephone call with Nagano regarding document review and ongoing projects
Robert Gralewski	10/29/2015	$350.00	0.1	7	Emails with Nagano regarding status of document review, assignments and projects
Robert Gralewski	11/4/2015	$350.00	0.2	7	Emails and telephone with Nagano regarding status of review and related matters
Robert Gralewski	11/10/2015	$350.00	0.1	7	Emails with Nagano regarding weekly conference and assignment [redacted]
Robert Gralewski	11/18/2015	$350.00	0.2	7	Telephone with Nagano regarding ongoing projects, specifically translations and document review
Robert Gralewski	12/2/2015	$350.00	0.1	7	Emails with Nagano regarding ongoing projects, deposition, and document review
Robert Gralewski	12/9/2015	$350.00	0.1	7	Emails with Nagano regarding status of review, assignments, and rescheduling of telephonic meeting
Robert Gralewski	12/10/2015	$350.00	0.5	7	Telephone with Nagano regarding [redacted] deposition and upcoming deposition of Kondo and her assignments pertaining to same, including check-translating
Robert Gralewski	12/16/2015	$350.00	0.1	7	Emails with Nagano regarding deposition and weekly status report/update
Robert Gralewski	12/21/2015	$775.00	0.2	11	Email with Lambrinos regarding Nagano's assistance at Kondo deposition and upcoming projects (0.1); follow up with Nagano and Hume regarding same (0.1)
Robert Gralewski	12/23/2015	$350.00	0.1	7	Emails with Nagano regarding status of review, projects, and schedule
Robert Gralewski	1/6/2016	$350.00	0.5	7	Telephone call with Nagano regarding status of review and current projects [redacted]
Robert Gralewski	1/14/2016	$350.00	0.2	7	Emails and telephone call with Nagano regarding status of current project
Robert Gralewski	1/20/2016	$350.00	0.1	7	Emails with Nagano regarding status of ongoing project and provide guidance regarding same
Robert Gralewski	2/17/2016	$350.00	0.10	7	emails with Nagano regarding status of project [redacted]
Robert Gralewski	3/2/2016	$800.00	0.7	11	Review correspondence from lead counsel regarding assessment request (0.1); draft and send response (0.2); follow up/emails with Hume, Kovel, and Telias regarding same (0.4)
Robert Gralewski	3/3/2016	$800.00	0.4	11	Telephone call with Hume regarding assessment request and status of case and related issues (0.4)
Robert Gralewski	3/4/2016	$800.00	0.2	11	Emails with MCOMM and Telias regarding assessment and status/posture of case (0.2); telephone call with Nagano regarding projects, evidence, and various other matters (0.3)
Robert Gralewski	3/4/2016	$350.00	0.3	7	
Robert Gralewski	3/9/2016	$800.00	0.10	11	emails with Nagano regarding ongoing projects, including translation objections and assisted Lambrinos with deposition preparation
Robert Gralewski	3/16/2016	$800.00	0.10	11	emails with Nagano regarding ongoing projects, including translation objections and drafted translations; follow up regarding her assisting Lambrinos with deposition preparation, [redacted]
Robert Gralewski	3/17/2016	$350.00	0.10	7	emails with Nagano [redacted]
Robert Gralewski	4/4/2016	$350.00	0.1	7	Follow up with Nagano regarding weekly call to discuss current projects and work assignments (0.1); emails with Press and Telias regarding assessment and status of case (0.1)
Robert Gralewski	4/4/2016	$800.00	0.1	11	
Robert Gralewski	4/5/2016	$800.00	0.4	11	Meet with Press and Linden regarding status of case and assessment request (0.4); follow up with Telias regarding same (0.1); telephone call with Nagano regarding status of projects including deposition preparation and translations and various other matters (0.2)
Robert Gralewski	4/5/2016	$800.00	0.1	11	
Robert Gralewski	4/5/2016	$350.00	0.2	7	
Robert Gralewski	4/13/2016	$800.00	0.2	11	Emails with Glackin regarding assessment (0.1); emails with Telias regarding same (0.1)
Robert Gralewski	4/14/2016	$350.00	0.2	7	Telephone call with Nagano regarding current projects
Robert Gralewski	4/19/2016	$800.00	0.1	11	Emails with Hume regarding Nagano's participation in Nakae deposition in Japan
Robert Gralewski	4/25/2016	$800.00	0.3	11	Emails with Nagano, Brizuela, Hume, and Sweigert regarding Visa application/process in connection with Nagano's upcoming deposition in Japan (0.3)
Robert Gralewski	4/26/2016	$800.00	0.1	11	Emails with Nagano regarding Panasonic deposition

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Robert Gralewski	4/28/2016	$800.00	0.2	11	Review Order regarding Joint Letter regarding deposition limits and follow up with Nagano regarding impact on deposition schedule
Robert Gralewski	5/3/2016	$800.00	0.1	11	Emails with Nagano [redacted] and ongoing work assignments
Robert Gralewski	5/4/2016	$800.00	0.3	11	Telephone call with Nagano regarding status of projects, including upcoming travel to Japan to serve as check translator (0.3)
Robert Gralewski	5/5/2016	$800.00	0.2	11	Emails with Nagano and Brizuela regarding assistance with letter for Visa application and related Visa application issues for Nagano's upcoming trip to Japan
Robert Gralewski	5/11/2016	$800.00	0.2	11	Telephone call with Nagano regarding status of projects re: depositions and travel to Japan (0.2);
Robert Gralewski	5/12/2016	$350.00	0.7	11	Review, edit, and finalize letter for Japanese Embassy for Nagano's trip to Tokyo (0.6); follow up with Glackin and Lin regarding same (0.1)
Robert Gralewski	6/8/2016	$800.00	0.1	11	Coordination with Glackin, and ongoing projects related to class certification and translation objections
Robert Gralewski	6/23/2016	$800.00	0.1	11	Emails with Nagano regarding Nakae deposition
Robert Gralewski	6/29/2016	$800.00	0.2	11	Telephone call with Nagano and debrief regarding [redacted]
Robert Gralewski	7/6/2016	$800.00	0.3	11	Emails and telephone call with Nagano [redacted] (0.2); review email string regarding document found by Nagano [redacted] (0.1)
Robert Gralewski	7/14/2016	$800.00	0.10	11	emails with Nagano regarding status of projects, including translation objections and deposition preparation
Robert Gralewski	7/18/2016	$800.00	0.10	11	emails with Nagano regarding status of projects, [redacted]
Robert Gralewski	8/3/2016	$350.00	0.10	7	emails with Nagano regarding projects, [redacted]
Robert Gralewski	8/11/2016	$350.00	0.10	7	emails with Nagano regarding projects, [redacted]
Robert Gralewski	9/14/2016	$350.00	0.1	7	Emails with Nagano regarding update related to ongoing projects, [redacted]
Robert Gralewski	9/21/2016	$350.00	0.2	7	Emails and telephone call with Nagano regarding status of document review and other projects
Robert Gralewski	9/23/2016	$800.00	0.1	11	Emails with Nagano regarding her serving as check translator for November deposition
Robert Gralewski	10/7/2016	$350.00	0.10	7	emails with Nagano regarding translation objections and work flow
Robert Gralewski	10/10/2016	$350.00	0.10	7	emails with Nagano regarding status of projects and work flow
Robert Gralewski	11/2/2016	$350.00	0.2	7	Emails with Nagano regarding status/update regarding projects (0.1); follow up regarding same (0.1)
Robert Gralewski Robert Gralewski	11/17/2016	$350.00	0.1	7	Email with Glacken regarding projects for Nagano and emails with Nagano regarding status of translation objection project (0.1)
Robert Gralewski	11/18/2016	$350.00	0.1	7	Emails with Nagano regarding translation objection project [redacted]
Robert Gralewski	11/30/2016	$350.00	0.4	7	Emails and telephone call with Nagano regarding status of translation objection project (0.3); follow up with Kim-Helms and Nagano regarding additional translation objections or other projects (0.1)
Robert Gralewski	12/1/2016	$350.00	0.1	7	Emails with Nagano and Kim-Helms regarding translation objection projects
Robert Gralewski	12/12/2016	$800.00	0.3	11	[redacted] (0.1); [redacted] (0.1); follow up with Cihlar regarding same (0.1)
Robert Gralewski	1/10/2017	$810.00	0.1	9	[redacted] and follow up with Cihlar regarding same
Robert Gralewski	1/25/2017	$810.00	0.50	11	[redacted]; follow up with Glackin
Robert Gralewski	1/31/2017	$350.00	0.10	7	follow up with Nagano regarding [redacted]
Robert Gralewski	2/1/2017	$350.00	0.10	7	additional follow up with Nagano regarding [redacted] and status of same
Robert Gralewski	2/23/2017	$810.00	0.20	11	emails with Nagano regarding serving as check translator for 5/10-12 deposition in New York
Ayako Mikuriya	3/6/2014	$450.00	2.00	7	Began preparing for Foreign language document review project by reading introductory materials [redacted]
Ayako Mikuriya	3/7/2014	$450.00	4.00	7	Attended Japanese language document review substantive conference meeting and Catalyst training session
Ayako Mikuriya	3/10/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	3/11/2014	$450.00	1.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	3/20/2014	$450.00	0.10	7	Exchanged correspondence in relation to Conducted Foreign language document review project
Ayako Mikuriya	5/23/2014	$450.00	1.00	7	Preparation for Foreign language document review (i.e. conference call with Bob; email correspondence with other colleagues regarding who will put how many hours/week, etc.)
Ayako Mikuriya	5/30/2014	$450.00	6.00	7	Reviewed relevant materials (i.e., coding manuals) for the Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/4/2014	$450.00	2.00	7	Attended additional Foreign language document review training session for Catalyst [redacted]
Ayako Mikuriya	6/5/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including communication regarding instructions and technical support
Ayako Mikuriya	6/6/2014	$450.00	2.00	7	Conducted Foreign language document review [redacted], including communication regarding instructions and technical support
Ayako Mikuriya	6/9/2014	$450.00	2.50	7	Conducted Foreign language document review [redacted]

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Ayako Mikuriya	6/10/2014	$450.00	4.50	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/11/2014	$450.00	3.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/12/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/13/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/17/2014	$450.00	4.00	7	Conducted Foreign language document review [redacted]
Ayako Mikuriya	6/19/2014	$450.00	4.00	7	Conducted Foreign language document review [redacted], including reviewing a memorandum regarding second amended complaint
Ayako Mikuriya	6/20/2014	$450.00	2.00	7	Conducted Foreign language document review [redacted], including reviewing a memorandum regarding second amended complaint
Ayako Mikuriya	6/23/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including correspondence regarding coding questions to the person in charge
Ayako Mikuriya	6/24/2014	$450.00	4.00	7	Conducted Foreign language document review [redacted], including correspondence with Hisun for guidance and instructions
Ayako Mikuriya	6/25/2014	$450.00	4.00	7	Conducted Foreign language document review [redacted], including correspondence with Hisun for guidance and instructions
Ayako Mikuriya	6/26/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including correspondence with Hisun and other Japanese reviewers for guidance and instructions
Ayako Mikuriya	6/30/2014	$450.00	3.50	7	Conducted Foreign language document review [redacted], including reading an instruction memorandum, research for technical terms and correspondence with Hisun for guidance and instructions
Ayako Mikuriya	7/1/2014	$450.00	5.00	7	Conducted Foreign language document review [redacted], including reading an instruction memorandum and review manual, conducted research for the technical terms, correspondence with Hisun for guidance and instructions, and telephone conference with all the reviewers
Ayako Mikuriya	7/3/2014	$450.00	3.00	7	Conducted Foreign language document review [redacted], including reading an instruction memorandum and review manual, conducted research for the technical terms, correspondence with Hisun for guidance and instructions, and telephone conference with all the reviewers
Ayako Mikuriya	7/9/2014	$450.00	0.50	7	reviewed an updated coding protocol to conduct [redacted] doc review
Ayako Mikuriya	7/10/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and reviewed manual, research for the technical terms and company name
Ayako Mikuriya	7/11/2014	$450.00	6.50	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and reviewed manual, research for the technical terms and company names, and correspondence with Hisun
Ayako Mikuriya	7/24/2014	$450.00	5.00	7	Conducted Foreign language document review [redacted], including reading the instruction memorandum and reviewed manual, research for the technical terms and company names
Ayako Mikuriya	7/25/2014	$450.00	2.50	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and reviewed manual, research for the technical terms and company names
Ayako Mikuriya	7/28/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and reviewed manual, research for the technical terms and company names
Ayako Mikuriya	7/29/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted], including reading the instruction memorandum and reviewed manual, research for the technical terms and company names as well as correspondence with Gralewski regarding work progress and status update
Ayako Mikuriya	7/30/2014	$450.00	5.50	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and reviewed manual, research for the technical terms and company names
Ayako Mikuriya	7/31/2014	$450.00	5.00	7	Conducted Foreign language document review [redacted]), including reading the instruction memorandum and reviewed manual, research for the technical terms and company names
Ayako Mikuriya	8/4/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted], including reading the instruction memorandum and review manual, performed research for the technical terms and company names
Ayako Mikuriya	8/5/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and review manual, performed research for the technical terms and company names
Ayako Mikuriya	8/7/2014	$450.00	3.50	7	Conducted Foreign language document review [redacted], including reading the instruction memorandum and review manual, research for the technical terms and company names; correspondence with Hisun
Ayako Mikuriya	8/13/2014	$450.00	6.00	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and review manual, research for the technical terms and company names
Ayako Mikuriya	8/14/2014	$450.00	7.00	7	Conducted Foreign language document review [redacted] including reading the instruction memorandum and review manual, research for the technical terms and company names; participated in conference call and individual call with Hisun
Ayako Mikuriya	8/20/2014	$450.00	3.00	7	Conducted Foreign language document review [redacted] including telephone call with Hisun and Sawa, [redacted] as well as installing Catalyst
Ayako Mikuriya	8/21/2014	$450.00	1.00	7	Conducted Foreign language document review [redacted]
Sawa Nagano	3/6/2014	$450.00	0.80	7	Reviewed introductory materials [redacted]
Sawa Nagano	3/7/2014	$450.00	1.50	7	Attended conference on substantive issues related to the Japanese document review and Catalyst training session

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Sawa Nagano	3/7/2014	$450.00	4.00	7	Continued to review the introductory materials [redacted] in preparation for document review
Sawa Nagano	3/10/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/11/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/12/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/13/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/14/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/17/2014	$450.00	6.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/18/2014	$450.00	3.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/19/2014	$450.00	3.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/20/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/21/2014	$450.00	7.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/22/2014	$450.00	4.00	7	reviewed Japanese documents ([redacted]
Sawa Nagano	3/23/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/24/2014	$450.00	0.50	7	conference with Spiegel regarding Catalyst searches
Sawa Nagano	3/24/2014	$450.00	5.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/25/2014	$450.00	2.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	3/26/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	6/13/2014	$450.00	1.00	7	attended supplemental Catalyst training session for the Batteries Antitrust document reviewers
Sawa Nagano	6/13/2014	$450.00	1.50	7	reviewed document review manuals on coding and describing documents specific to a different production of documents
Sawa Nagano	6/13/2014	$450.00	3.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/16/2014	$450.00	3.00	7	reviewed Japanese documents ([redacted] and recorded relevant parts.
Sawa Nagano	6/17/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/18/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/19/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/20/2014	$450.00	0.50	7	conference with an LCHB attorney regarding [redacted] document production
Sawa Nagano	6/20/2014	$450.00	4.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/23/2014	$450.00	3.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/24/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/25/2014	$450.00	4.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/26/2014	$450.00	4.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/27/2014	$450.00	3.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	6/30/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/1/2014	$450.00	3.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/1/2014	$450.00	1.00	7	attended teleconference regarding document revew and discussed [redacted] production
Sawa Nagano	7/2/2014	$450.00	4.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/3/2014	$450.00	4.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/4/2014	$450.00	2.50	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/7/2014	$450.00	4.00	7	reviewed Japanese documents [redacted] and recorded relevant parts.
Sawa Nagano	7/8/2014	$450.00	3.00	7	reviewed Japanese documents [redacted] and created a document review batch memorandum
Sawa Nagano	7/9/2014	$450.00	4.20	7	reviewed Japanese documents [redacted] and created a document review batch memorandum
Sawa Nagano	7/10/2014	$450.00	4.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/11/2014	$450.00	4.50	7	reviewed Japanese documents ([redacted]
Sawa Nagano	7/14/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/15/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/16/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/17/2014	$450.00	2.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/18/2014	$450.00	5.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/21/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/22/2014	$450.00	2.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/23/2014	$450.00	6.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/24/2014	$450.00	4.50	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/25/2014	$450.00	3.50	7	reviewed Japanese documents [redacted]

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Sawa Nagano	7/28/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/29/2014	$450.00	5.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/30/2014	$450.00	3.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	7/31/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	8/1/2014	$450.00	4.00	7	reviewed Japanese documents [redacted]
Sawa Nagano	8/4/2014	$450.00	6.50	7	Reviewed T2 level [redacted]
Sawa Nagano	8/5/2014	$450.00	5.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/6/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/7/2014	$450.00	0.50	7	edited T-1 level reviewed coding
Sawa Nagano	8/8/2014	$450.00	3.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/11/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/12/2014	$450.00	5.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/13/2014	$450.00	3.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/14/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted] attended a conference call
Sawa Nagano	8/15/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/18/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/19/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/20/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/21/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/22/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	8/25/2014	$450.00	0.50	7	reviewed [redacted] documents; reviewed, at T2 level, [redacted]
Sawa Nagano	8/26/2014	$450.00	3.00	7	reviewed at T2 level, [redacted]
Sawa Nagano	8/26/2014	$450.00	3.20	7	reviewed [redacted] documents in Japanese for conspiracy
Sawa Nagano	8/27/2014	$450.00	7.00	7	reviewed [redacted] documents (3.25); reviewed, at T2 level, [redacted] (3.75)
Sawa Nagano	8/28/2014	$450.00	4.00	7	reviewed [redacted] documents (2); reviewed, at T2 level, [redacted] (2)
Sawa Nagano	8/29/2014	$450.00	2.20	7	reviewed [redacted] documents (1); reviewed, at T2 level, [redacted] (1.25)
Sawa Nagano	9/1/2014	$450.00	4.00	7	translated hot Japanese documents [redacted]
Sawa Nagano	9/2/2014	$450.00	4.50	7	translated hot Japanese documents [redacted]
Sawa Nagano	9/3/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/4/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/5/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/8/2014	$450.00	3.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/9/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/10/2014	$450.00	4.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/11/2014	$450.00	7.70	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/12/2014	$450.00	0.20	7	conference with HS Rim regarding document review and hot documents
Sawa Nagano	9/12/2014	$450.00	0.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/15/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/17/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/18/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]

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Sawa Nagano	9/19/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/22/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/23/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/24/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/25/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/26/2014	$450.00	6.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/29/2014	$450.00	2.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	9/30/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/1/2014	$450.00	2.00	7	[redacted]
Sawa Nagano	10/1/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/2/2014	$450.00	2.20	7	[redacted]
Sawa Nagano	10/2/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/3/2014	$450.00	2.20	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/3/2014	$450.00	2.00	7	[redacted]
Sawa Nagano	10/6/2014	$450.00	0.50	7	[redacted]
Sawa Nagano	10/6/2014	$450.00	2.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/6/2014	$450.00	1.00	7	[redacted]
Sawa Nagano	10/7/2014	$450.00	2.00	7	[redacted]
Sawa Nagano	10/7/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/8/2014	$450.00	0.20	7	[redacted]
Sawa Nagano	10/8/2014	$450.00	0.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/9/2014	$450.00	2.50	7	[redacted]
Sawa Nagano	10/9/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/10/2014	$450.00	3.50	7	[redacted]
Sawa Nagano	10/10/2014	$450.00	3.20	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/13/2014	$450.00	2.00	7	[redacted]
Sawa Nagano	10/13/2014	$450.00	2.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/14/2014	$450.00	1.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/14/2014	$450.00	1.50	7	[redacted]
Sawa Nagano	10/15/2014	$450.00	1.50	7	[redacted]
Sawa Nagano	10/15/2014	$450.00	2.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/16/2014	$450.00	4.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/17/2014	$450.00	4.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/20/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]

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Sawa Nagano	10/21/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted] (.25)
Sawa Nagano	10/22/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/23/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/24/2014	$450.00	2.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/30/2014	$450.00	5.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	10/31/2014	$450.00	8.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/3/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/4/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted] attended weekly conference (0.5)
Sawa Nagano	11/5/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/6/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/7/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/10/2014	$450.00	3.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/11/2014	$450.00	5.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/12/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/13/2014	$450.00	0.50	7	corresponded with Rim
Sawa Nagano	11/13/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/14/2014	$450.00	4.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/17/2014	$450.00	1.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/18/2014	$450.00	3.70	7	reviewed, at T2 level, [redacted] attended weekly conference (0.5)
Sawa Nagano	11/19/2014	$450.00	3.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/20/2014	$450.00	6.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/21/2014	$450.00	5.20	7	reviewed, at T2 level, [redacted]
Sawa Nagano	11/24/2014	$450.00	4.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	11/25/2014	$450.00	3.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	11/26/2014	$450.00	1.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/1/2014	$450.00	1.50	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/2/2014	$450.00	2.00	7	reviewed, at T1/T2 level, [redacted]

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Sawa Nagano	12/4/2014	$450.00	1.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/5/2014	$450.00	8.20	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/8/2014	$450.00	1.70	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/9/2014	$450.00	1.20	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/10/2014	$450.00	1.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/11/2014	$450.00	2.00	7	reviewed, at T1/T2 level [redacted]
Sawa Nagano	12/12/2014	$450.00	4.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/16/2014	$450.00	2.50	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	12/16/2014	$450.00	0.50	7	attend a weekly conference call regarding review and hot documents
Sawa Nagano	12/17/2014	$450.00	5.50	7	reviewed, at T2 level, [redacted])
Sawa Nagano	12/18/2014	$450.00	8.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	12/19/2014	$450.00	2.20	7	reviewed, at T2 level, [redacted]
Sawa Nagano	12/22/2014	$450.00	7.50	7	reviewed, at T2 level [redacted]
Sawa Nagano	12/23/2014	$450.00	10.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	12/24/2014	$450.00	5.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	12/29/2014	$450.00	1.50	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/5/2015	$450.00	3.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/6/2015	$450.00	0.20	7	attended weekly teleconference pertaining to document review project
Sawa Nagano	1/7/2015	$450.00	8.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/8/2015	$450.00	2.00	7	reviewed, at T1/T2 level [redacted]
Sawa Nagano	1/9/2015	$450.00	5.70	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/12/2015	$450.00	6.50	7	translated [redacted] organizational charts [redacted]
Sawa Nagano	1/13/2015	$450.00	7.00	7	translated [redacted] organizational charts [redacted]
Sawa Nagano	1/19/2015	$450.00	7.70	7	translated [redacted] documents into English
Sawa Nagano	1/20/2015	$450.00	7.50	7	translated [redacted] documents into English
Sawa Nagano	1/21/2015	$450.00	7.50	7	translated [redacted] documents into English
Sawa Nagano	1/22/2015	$450.00	8.50	7	translated [redacted] documents into English
Sawa Nagano	1/26/2015	$450.00	4.00	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/27/2015	$450.00	1.70	7	reviewed, at T1/T2 level, [redacted]
Sawa Nagano	1/28/2015	$450.00	3.00	7	translated [redacted], per the team leader's request
Sawa Nagano	1/29/2015	$450.00	7.00	7	translated [redacted], per the team leader's request
Sawa Nagano	1/30/2015	$450.00	4.70	7	translated [redacted], per the team leader's request
Sawa Nagano	2/3/2015	$450.00	0.20	7	attended team conference pertaining to document review project
Sawa Nagano	2/12/2015	$450.00	1.00	7	review at T2 level, [redacted]
Sawa Nagano	2/13/2015	$450.00	1.00	7	review at T2 level, [redacted]
Sawa Nagano	2/18/2015	$450.00	0.70	7	review at T2 level, [redacted]
Sawa Nagano	2/19/2015	$450.00	1.00	7	review at T2 level, [redacted]
Sawa Nagano	2/20/2015	$450.00	0.70	7	review at T2 level [redacted]
Sawa Nagano	2/26/2015	$450.00	1.00	7	review at T2 level, [redacted]
Sawa Nagano	2/27/2015	$450.00	1.00	7	review at T2 level, [redacted]
Sawa Nagano	3/5/2015	$450.00	1.00	7	reviewed, at T2 level, [redacted]

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Sawa Nagano	3/6/2015	$450.00	1.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/9/2015	$450.00	8.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/10/2015	$450.00	8.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/11/2015	$450.00	7.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/12/2015	$450.00	9.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/13/2015	$450.00	8.00	7	reviewed, at T2 level, [redacted]
Sawa Nagano	3/16/2015	$450.00	8.50	7	reviewed, at T2 level, [redacted]
Sawa Nagano	7/1/2015	$450.00	7.70	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and create hot document table (7.7)
Sawa Nagano	7/2/2015	$450.00	7.70	7	search and review documents related to [redacted] with search terms related to meetings in preparation of a deposition and create hot document table (7.7)
Sawa Nagano	7/3/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and create hot document table
Sawa Nagano	7/6/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and create hot document table
Sawa Nagano	7/7/2015	$450.00	0.50	7	attend a weekly group meeting
Sawa Nagano	7/7/2015	$450.00	7.20	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and create hot document table
Sawa Nagano	7/8/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition; create hot document table
Sawa Nagano	7/9/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition
Sawa Nagano	7/10/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and draft [redacted] background memorandum
Sawa Nagano	7/13/2015	$450.00	8.50	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and draft [redacted] background memorandum
Sawa Nagano	7/14/2015	$450.00	0.50	7	attend a weekly group meeting
Sawa Nagano	7/14/2015	$450.00	8.00	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition and draft [redacted] background memorandum
Sawa Nagano	7/15/2015	$450.00	3.50	7	search and review documents related to [redacted] for his background memorandum in preparation of a deposition; draft [redacted] background memorandum; submit the background memorandum
Sawa Nagano	7/15/2015	$450.00	4.00	7	review English translations of exhibits filed with [redacted]
Sawa Nagano	7/16/2015	$450.00	7.50	7	review English translations of exhibits [redacted]
Sawa Nagano	7/17/2015	$450.00	7.50	7	review English translations of exhibits [redacted]
Sawa Nagano	7/20/2015	$450.00	7.00	7	review English translations of exhibits [redacted]
Sawa Nagano	7/21/2015	$450.00	3.00	7	correspond with Lambrinos and the management team, and conduct additional searches and reviews [redacted]
Sawa Nagano	7/21/2015	$450.00	2.50	7	ran additional searches [redacted]
Sawa Nagano	7/21/2015	$450.00	2.50	7	assist Lambrinos with selection of documents [redacted]
Sawa Nagano	7/21/2015	$450.00	0.50	7	attend the weekly group conference
Sawa Nagano	7/22/2015	$450.00	3.00	7	correspond with Lambrinos and the management team, and conduct additional searches and reviews [redacted]
Sawa Nagano	7/22/2015	$450.00	2.50	7	assist Kim-Helms with selection of documents [redacted]
Sawa Nagano	7/22/2015	$450.00	3.00	7	assist Kim-Helms with the Japanese author name list
Sawa Nagano	7/23/2015	$450.00	5.50	7	correspond with Lambrinos and the management team, and conduct additional searches and reviews [redacted]
Sawa Nagano	7/23/2015	$450.00	2.50	7	conduct additional searches [redacted]
Sawa Nagano	7/24/2015	$450.00	3.50	7	review and incorporate hot documents for [redacted], coded by other reviewers
Sawa Nagano	7/24/2015	$450.00	4.00	7	start reviewing [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	7/27/2015	$450.00	3.50	7	review English translations of exhibits filed [redacted]
Sawa Nagano	7/27/2015	$450.00	4.50	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	7/28/2015	$450.00	4.00	7	review English translations of exhibits [redacted] attend a weekly conference (0.5)
Sawa Nagano	7/28/2015	$450.00	4.00	7	review [redacted] documents to prepare for [redacted] deposition (2.2); draft [redacted] background memorandum (1.8)
Sawa Nagano	7/29/2015	$450.00	3.50	7	review English translations of exhibits [redacted]
Sawa Nagano	7/29/2015	$450.00	4.00	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	7/30/2015	$450.00	5.00	7	review English translations of exhibits [redacted]

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Sawa Nagano	7/30/2015	$450.00	3.50	7	review [redacted] documents to prepare for [redacted] deposition; draft [redacted] background memorandum
Sawa Nagano	7/30/2015	$450.00	0.50	7	assist Lambrinos with hot list [redacted]
Sawa Nagano	7/31/2015	$450.00	3.00	7	review English translations of exhibits [redacted]
Sawa Nagano	7/31/2015	$450.00	1.00	7	assist Lambrinos with hot list for CT selection
Sawa Nagano	7/31/2015	$450.00	3.00	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/3/2015	$450.00	4.00	7	review English translations of exhibits filed with [redacted] Motion for Summary Judgment, and propose objections to the English translations
Sawa Nagano	8/3/2015	$450.00	3.00	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/3/2015	$450.00	1.00	7	assist Lambrinos with a list for [redacted]
Sawa Nagano	8/4/2015	$450.00	5.00	7	review English translations of exhibits [redacted]
Sawa Nagano	8/4/2015	$450.00	2.50	7	review [redacted] l documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/4/2015	$450.00	1.50	7	assist Lambrinos with a lis [redacted] (1); attend a weekly conference (.5)
Sawa Nagano	8/5/2015	$450.00	4.00	7	review English translations of exhibits [redacted]
Sawa Nagano	8/5/2015	$450.00	2.50	7	assist Lambrinos with a list [redacted]
Sawa Nagano	8/5/2015	$450.00	1.50	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/6/2015	$450.00	4.00	7	review English translations of exhibits [redacted]
Sawa Nagano	8/6/2015	$450.00	1.50	7	assist Lambrinos with a list [redacted]
Sawa Nagano	8/6/2015	$450.00	2.50	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/7/2015	$450.00	3.00	7	review English translations of exhibits [redacted]
Sawa Nagano	8/7/2015	$450.00	2.00	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/7/2015	$450.00	2.00	7	assist Lambrinos with a list [redacted]
Sawa Nagano	8/10/2015	$450.00	1.50	7	assist Lambrinos with a list [redacted] deposition
Sawa Nagano	8/10/2015	$450.00	6.50	7	search and review documents [redacted]
Sawa Nagano	8/11/2015	$450.00	5.00	7	search and review documents [redacted]
Sawa Nagano	8/11/2015	$450.00	3.00	7	draft a supplemental memorandum for [redacted] deposition
Sawa Nagano	8/12/2015	$450.00	3.00	7	draft a supplemental memorandum for [redacted] deposition
Sawa Nagano	8/12/2015	$450.00	5.00	7	search and review documents [redacted]
Sawa Nagano	8/13/2015	$450.00	8.00	7	review [redacted] documents to prepare for [redacted] deposition and draft [redacted] background memorandum
Sawa Nagano	8/14/2015	$450.00	4.50	7	assist Kim-Helms with the translation objections to exhibits [redacted]
Sawa Nagano	8/14/2015	$450.00	0.50	7	draft [redacted] background memorandum
Sawa Nagano	8/14/2015	$450.00	3.00	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	8/17/2015	$450.00	3.00	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	8/17/2015	$450.00	1.50	7	draft [redacted] s background memorandum
Sawa Nagano	8/17/2015	$450.00	3.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/18/2015	$450.00	8.00	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/19/2015	$450.00	8.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/20/2015	$450.00	8.00	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/21/2015	$450.00	7.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/24/2015	$450.00	7.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted]
Sawa Nagano	8/24/2015	$450.00	0.50	7	conference with Pilotin and Lambrinos for [redacted] deposition
Sawa Nagano	8/25/2015	$450.00	6.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted] depositions, [redacted]
Sawa Nagano	8/25/2015	$450.00	2.00	7	select documents for [redacted] deposition exhibits
Sawa Nagano	8/26/2015	$450.00	6.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted] deposition, [redacted]
Sawa Nagano	8/26/2015	$450.00	2.00	7	select documents [redacted] deposition exhibits

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Sawa Nagano	8/27/2015	$450.00	2.00	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted] deposition, [redacted]
Sawa Nagano	8/27/2015	$450.00	3.00	7	select documents for [redacted] deposition exhibits and proofread draft translations [redacted]
Sawa Nagano	8/27/2015	$450.00	3.50	7	create hot document list
Sawa Nagano	8/28/2015	$450.00	1.00	7	recommend [redacted] documents [redacted] for [redacted] deposition
Sawa Nagano	8/28/2015	$450.00	5.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted] depositions, [redacted]
Sawa Nagano	8/31/2015	$450.00	3.50	7	select documents for [redacted] deposition exhibits
Sawa Nagano	8/31/2015	$450.00	5.50	7	assist Pilotin and Lambrinos with preparation for upcoming [redacted] depositions, [redacted]
Sawa Nagano	9/1/2015	$450.00	1.00	7	create hot document table
Sawa Nagano	9/1/2015	$450.00	0.50	7	draft [redacted] background memorandum
Sawa Nagano	9/1/2015	$450.00	6.50	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/2/2015	$450.00	2.00	7	draft [redacted] background memorandum
Sawa Nagano	9/2/2015	$450.00	1.00	7	create hot document table
Sawa Nagano	9/2/2015	$450.00	5.00	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/3/2015	$450.00	5.00	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/3/2015	$450.00	1.00	7	create hot document table
Sawa Nagano	9/3/2015	$450.00	2.00	7	draft [redacted] background memorandum
Sawa Nagano	9/4/2015	$450.00	3.50	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/4/2015	$450.00	0.50	7	draft [redacted] background memorandum
Sawa Nagano	9/4/2015	$450.00	0.50	7	create hot document table
Sawa Nagano	9/4/2015	$450.00	2.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	9/7/2015	$450.00	3.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	9/7/2015	$450.00	0.50	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/7/2015	$450.00	1.00	7	draft [redacted] s background memorandum
Sawa Nagano	9/7/2015	$450.00	0.50	7	create hot document table
Sawa Nagano	9/8/2015	$450.00	3.00	7	review [redacted] documents to prepare for [redacted] deposition
Sawa Nagano	9/8/2015	$450.00	0.50	7	draft [redacted] background memorandum
Sawa Nagano	9/8/2015	$450.00	0.50	7	create hot document table
Sawa Nagano	9/8/2015	$450.00	5.00	7	proofread draft translations to be certified for [redacted] deposition; attend weekly conference
Sawa Nagano	9/9/2015	$450.00	5.50	7	search and review documents in relation to supply agreement
Sawa Nagano	9/9/2015	$450.00	2.50	7	draft and finalize [redacted] background memorandum
Sawa Nagano	9/10/2015	$450.00	8.50	7	search and review documents [redacted]
Sawa Nagano	9/11/2015	$450.00	9.00	7	search and review documents [redacted]
Sawa Nagano	9/14/2015	$450.00	4.00	7	search and review documents [redacted]
Sawa Nagano	9/14/2015	$450.00	4.00	7	proofread draft translation for [redacted] deposition
Sawa Nagano	9/15/2015	$450.00	4.00	7	search and review documents [redacted]
Sawa Nagano	9/15/2015	$450.00	4.50	7	proofread draft translation for [redacted] deposition
Sawa Nagano	9/16/2015	$450.00	0.50	7	attend weekly conference
Sawa Nagano	9/16/2015	$450.00	6.00	7	search and review documents [redacted]
Sawa Nagano	9/17/2015	$450.00	4.00	7	search and review documents [redacted]
Sawa Nagano	9/17/2015	$450.00	4.50	7	proofread draft translation for [redacted] deposition
Sawa Nagano	9/18/2015	$450.00	3.50	7	search and review documents [redacted]
Sawa Nagano	9/18/2015	$450.00	0.50	7	create document table
Sawa Nagano	9/18/2015	$450.00	4.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	9/21/2015	$450.00	8.00	7	search and review [redacted] and create document table
Sawa Nagano	9/22/2015	$450.00	8.00	7	search and review [redacted] and create document table
Sawa Nagano	9/23/2015	$450.00	4.00	7	search and review [redacted] and create document table
Sawa Nagano	9/23/2015	$450.00	4.00	7	review [redacted] response to [redacted]
Sawa Nagano	9/24/2015	$450.00	1.50	7	search and review newly produced [redacted] documents [redacted]
Sawa Nagano	9/24/2015	$450.00	2.00	7	search and review [redacted] documents [redacted] and create document table
Sawa Nagano	9/24/2015	$450.00	4.00	7	review [redacted] response to [redacted]
Sawa Nagano	9/25/2015	$450.00	8.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	9/27/2015	$450.00	0.20	7	consult major dictionaries [redacted]
Sawa Nagano	9/27/2015	$450.00	0.20	7	review [redacted] response to [redacted]
Sawa Nagano	9/28/2015	$450.00	3.00	7	search and review [redacted]
Sawa Nagano	9/28/2015	$450.00	3.00	7	review [redacted] response to [redacted]
Sawa Nagano	9/28/2015	$450.00	2.00	7	consult major dictionaries [redacted]
Sawa Nagano	9/29/2015	$450.00	8.00	7	search and review [redacted] documents [redacted]

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Sawa Nagano	9/30/2015	$450.00	8.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/1/2015	$450.00	3.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/1/2015	$450.00	2.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/1/2015	$450.00	3.00	7	[redacted]
Sawa Nagano	10/2/2015	$450.00	4.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/2/2015	$450.00	4.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/5/2015	$450.00	3.50	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/5/2015	$450.00	6.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/6/2015	$450.00	3.50	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/6/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/7/2015	$450.00	3.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/7/2015	$575.00	2.50	2	assist Lambrinos at [redacted] deposition remotely [redacted]
Sawa Nagano	10/7/2015	$450.00	2.00	7	proofread draft translations to be certified for [redacted]
Sawa Nagano	10/8/2015	$450.00	3.00	7	search and review [redacted] documents [redacted]
Sawa Nagano	10/8/2015	$450.00	2.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/8/2015	$575.00	2.50	2	assist Lambrinos at [redacted] deposition remotely [redacted]
Sawa Nagano	10/9/2015	$450.00	3.50	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/9/2015	$450.00	4.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/12/2015	$450.00	4.00	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/12/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/13/2015	$450.00	4.00	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/13/2015	$450.00	4.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/14/2015	$450.00	8.50	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/15/2015	$450.00	8.00	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/16/2015	$450.00	3.50	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/16/2015	$450.00	3.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/19/2015	$450.00	3.00	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/19/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/20/2015	$450.00	8.50	7	search and review [redacted] documents [redacted] and created document table
Sawa Nagano	10/21/2015	$450.00	8.00	7	search and review documents related to [redacted] in preparation for deposition and created document table
Sawa Nagano	10/22/2015	$450.00	3.50	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/22/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/23/2015	$450.00	3.50	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/23/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/26/2015	$450.00	4.00	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/26/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	10/27/2015	$450.00	8.00	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/28/2015	$450.00	8.00	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/29/2015	$450.00	8.00	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	10/30/2015	$450.00	7.50	7	search and review documents [redacted] in preparation for deposition and created document table
Sawa Nagano	11/2/2015	$450.00	9.00	7	search and reviewed documents [redacted] in preparation for deposition and created document table
Sawa Nagano	11/3/2015	$450.00	3.00	7	search and reviewed documents [redacted] in preparation for deposition and created document table
Sawa Nagano	11/3/2015	$450.00	1.50	7	proofread draft translations to be certified for [redacted]
Sawa Nagano	11/3/2015	$450.00	2.50	7	reviewed [redacted]
Sawa Nagano	11/4/2015	$450.00	4.00	7	proofread draft translations to be certified [redacted]

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Sawa Nagano	11/4/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/5/2015	$450.00	3.00	7	proofread draft translations to be certified for [redacted]
Sawa Nagano	11/5/2015	$450.00	2.50	7	translated [redacted] legal documents, including cross-licensing agreements
Sawa Nagano	11/5/2015	$450.00	2.50	7	reviewed [redacted]
Sawa Nagano	11/6/2015	$450.00	3.00	7	[redacted]
Sawa Nagano	11/6/2015	$450.00	2.50	7	proofread draft translations to be certified [redacted]
Sawa Nagano	11/6/2015	$450.00	2.50	7	translated [redacted] legal documents [redacted]
Sawa Nagano	11/9/2015	$450.00	4.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/9/2015	$450.00	3.50	7	[redacted]
Sawa Nagano	11/9/2015	$450.00	1.50	7	translated [redacted] legal documents, [redacted]
Sawa Nagano	11/10/2015	$450.00	3.00	7	[redacted]
Sawa Nagano	11/10/2015	$450.00	2.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/10/2015	$450.00	2.50	7	[redacted]
Sawa Nagano	11/11/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/11/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/12/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/12/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/13/2015	$450.00	4.00	7	[redacted]
Sawa Nagano	11/13/2015	$450.00	3.00	7	[redacted]
Sawa Nagano	11/16/2015	$450.00	8.50	7	[redacted]
Sawa Nagano	11/17/2015	$450.00	3.50	7	[redacted]
Sawa Nagano	11/17/2015	$450.00	3.50	7	[redacted]
Sawa Nagano	11/18/2015	$450.00	5.00	7	[redacted]
Sawa Nagano	11/18/2015	$450.00	3.00	7	reviewed and summarize [redacted]
Sawa Nagano	11/19/2015	$450.00	5.50	7	proofread draft translations to be certified for [redacted] depositions
Sawa Nagano	11/19/2015	$450.00	3.50	7	reviewed and summarized [redacted]
Sawa Nagano	11/20/2015	$450.00	8.00	7	reviewed and summarize [redacted]
Sawa Nagano	11/23/2015	$450.00	5.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/23/2015	$450.00	4.50	7	reviewed and summarized [redacted]
Sawa Nagano	11/24/2015	$450.00	4.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/24/2015	$450.00	4.00	7	reviewed and summarized [redacted]
Sawa Nagano	11/25/2015	$450.00	2.00	7	run searches [redacted]
Sawa Nagano	11/25/2015	$450.00	2.50	7	translated a document for [redacted] deposition
Sawa Nagano	11/25/2015	$450.00	2.50	7	reviewed and summarized [redacted]
Sawa Nagano	11/25/2015	$450.00	2.50	7	proofread draft translations to be certified for [redacted] depositions
Sawa Nagano	11/26/2015	$450.00	2.00	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/27/2015	$450.00	4.50	7	reviewed and summarized [redacted]
Sawa Nagano	11/27/2015	$450.00	4.50	7	proofread draft translations to be certified for [redacted] deposition
Sawa Nagano	11/28/2015	$450.00	1.00	7	reviewed hot documents [redacted] in preparation for the [redacted] deposition
Sawa Nagano	11/30/2015	$450.00	3.50	7	reviewed hot documents [redacted] in preparation for the [redacted] deposition
Sawa Nagano	11/30/2015	$450.00	4.50	7	reviewed and summarized [redacted]
Sawa Nagano	12/1/2015	$450.00	2.20	7	reviewed [redacted] in preparation for [redacted] deposition
Sawa Nagano	12/1/2015	$450.00	3.00	7	assisted search and reviewed in preparation for [redacted] deposition per D. Lambrinos' request
Sawa Nagano	12/2/2015	$575.00	10.70	4	attended [redacted] deposition [redacted] as a check translator [redacted]
Sawa Nagano	12/3/2015	$575.00	8.50	4	attended [redacted] deposition [redacted] as a check translator [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Contemporaneous Time Records
June 1, 2013 through February 28, 2017

Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
Sawa Nagano	12/4/2015	$575.00	7.50	4	attended [redacted] deposition [redacted] as a check translator [redacted]
Sawa Nagano	12/7/2015	$575.00	4.00	2	reviewed and summarized [redacted]
Sawa Nagano	12/7/2015	$450.00	4.00	7	proofread English draft translations [redacted]
Sawa Nagano	12/8/2015	$450.00	4.50	7	proofread English draft translations [redacted]
Sawa Nagano	12/8/2015	$450.00	3.50	7	reviewed and summarized [redacted]
Sawa Nagano	12/9/2015	$450.00	3.50	7	reviewed documents in preparation for the [redacted] deposition
Sawa Nagano	12/9/2015	$450.00	2.50	7	proofread English draft translations [redacted]
Sawa Nagano	12/9/2015	$450.00	2.00	7	reviewed and summarized [redacted]
Sawa Nagano	12/10/2015	$450.00	4.00	7	reviewed documents in preparation for the [redacted] deposition
Sawa Nagano	12/10/2015	$450.00	4.00	7	reviewed and summarized [redacted]
Sawa Nagano	12/11/2015	$450.00	2.50	7	reviewed documents in preparation for the [redacted] deposition
Sawa Nagano	12/11/2015	$450.00	3.00	7	proofread draft English translations [redacted] to be used in [redacted] deposition
Sawa Nagano	12/11/2015	$450.00	2.50	7	reviewed and summarized [redacted]
Sawa Nagano	12/14/2015	$450.00	4.00	7	reviewed documents in preparation for the [redacted] deposition
Sawa Nagano	12/14/2015	$450.00	4.00	7	proofread draft English translations [redacted] to be used in [redacted] deposition
Sawa Nagano	12/15/2015	$450.00	2.00	7	reviewed documents in preparation for the [redacted] deposition
Sawa Nagano	12/16/2015	$575.00	10.00	4	attended [redacted] deposition as a check translator [redacted]
Sawa Nagano	12/17/2015	$575.00	10.50	4	attended [redacted] deposition as a check translator [redacted]
Sawa Nagano	12/18/2015	$575.00	9.50	4	attended M. [redacted] deposition as a check translator [redacted]
Sawa Nagano	12/21/2015	$450.00	4.00	7	translated a Japanese document [redacted]
Sawa Nagano	12/21/2015	$450.00	6.00	7	drafted IPP's response to [redacted]
Sawa Nagano	12/22/2015	$450.00	5.50	7	drafted IPP's response to [redacted]
Sawa Nagano	12/22/2015	$450.00	4.50	7	translated a Japanese document [redacted]
Sawa Nagano	12/23/2015	$450.00	5.50	7	translated a Japanese document [redacted]
Sawa Nagano	12/23/2015	$450.00	4.50	7	drafted IPP's response to [redacted]
Sawa Nagano	12/24/2015	$450.00	5.00	7	translated a Japanese document [redacted]
Sawa Nagano	12/24/2015	$450.00	5.00	7	drafted IPP's response to [redacted]
Sawa Nagano	12/28/2015	$450.00	2.00	7	drafted IPP's response to [redacted]
Sawa Nagano	12/29/2015	$575.00	1.00	2	provided potential deponents' names for [redacted]
Sawa Nagano	12/29/2015	$450.00	1.00	7	drafted IPP's response to [redacted]
Sawa Nagano	12/30/2015	$575.00	0.50	2	follow up on [redacted]
Sawa Nagano	12/30/2015	$450.00	1.50	7	drafted IPP's response to [redacted]
Sawa Nagano	12/31/2015	$450.00	2.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/4/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/5/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/6/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/7/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/8/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	1/11/2016	$575.00	3.70	2	per Lambrinos' request, reviewed and summarized [redacted]
Sawa Nagano	1/11/2016	$450.00	4.20	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/12/2016	$450.00	8.00	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/13/2016	$450.00	8.00	7	drafted IPP's translation objections to [redacted] bits
Sawa Nagano	1/14/2016	$450.00	4.00	7	per Lambrinos' request, reviewed and summarized [redacted]
Sawa Nagano	1/14/2016	$450.00	4.00	7	drafted IPP's translation objections [redacted]
Sawa Nagano	1/15/2016	$450.00	4.00	7	per Lambrinos' request, reviewed and summarized [redacted]
Sawa Nagano	1/15/2016	$450.00	4.00	7	drafted IPP's translation objections [redacted]
Sawa Nagano	1/18/2016	$450.00	4.00	7	per Lambrinos' request, reviewed and summarized [redacted]
Sawa Nagano	1/18/2016	$450.00	4.00	7	drafted IPP's translation objections [redacted]
Sawa Nagano	1/19/2016	$450.00	3.50	7	per Lambrinos' request, search and review [redacted]
Sawa Nagano	1/19/2016	$450.00	3.50	7	drafted IPP's translation objections [redacted]
Sawa Nagano	1/20/2016	$450.00	4.20	7	drafted IPP's response to [redacted]
Sawa Nagano	1/20/2016	$450.00	4.20	7	drafted IPP's translation objections [redacted]
Sawa Nagano	1/21/2016	$450.00	1.20	7	follow up on IPP's translation objections [redacted]
Sawa Nagano	1/21/2016	$450.00	7.20	7	drafted IPP's response to Sanyo's translation objections [redacted]
Sawa Nagano	1/22/2016	$450.00	8.00	7	drafted IPP's response to Sanyo's translation objections [redacted]
Sawa Nagano	1/25/2016	$450.00	3.50	7	per Lambrinos' request, searched and reviewed documents [redacted]
Sawa Nagano	1/25/2016	$450.00	3.50	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/26/2016	$450.00	4.00	7	per Lambrinos' request, searched and reviewed documents [redacted]
Sawa Nagano	1/26/2016	$450.00	4.50	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/27/2016	$450.00	3.70	7	per Lambrinos' request, searched and reviewed documents [redacted]

Kirby McInerney LLP
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Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
Sawa Nagano	1/27/2016	$450.00	3.70	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/28/2016	$450.00	4.00	7	per Lambrinos' request, searched and reviewed documents [redacted]
Sawa Nagano	1/28/2016	$450.00	5.00	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	1/29/2016	$450.00	4.00	7	per Lambrinos' request, searched and reviewed documents [redacted]
Sawa Nagano	1/29/2016	$450.00	4.00	7	drafted IPP's translation objections to [redacted]
Sawa Nagano	2/1/2016	$450.00	8.00	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/2/2016	$450.00	8.00	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/3/2016	$450.00	8.00	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/4/2016	$450.00	4.20	7	[redacted]
Sawa Nagano	2/4/2016	$450.00	3.70	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/5/2016	$450.00	8.00	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/8/2016	$450.00	3.20	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/8/2016	$450.00	2.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/8/2016	$450.00	2.70	7	drafted IPP's response [redacted]
Sawa Nagano	2/9/2016	$450.00	4.00	7	per Lambrino's request, searched, reviewed and provided summaries of [redacted]
Sawa Nagano	2/9/2016	$450.00	4.50	7	drafted IPP's response [redacted]
Sawa Nagano	2/10/2016	$450.00	2.00	7	per Lambrino's request, searched for [redacted]
Sawa Nagano	2/10/2016	$450.00	2.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/10/2016	$450.00	4.50	7	drafted IPP's response to [redacted]
Sawa Nagano	2/11/2016	$450.00	1.50	7	per Lambrino's request, searched for [redacted]
Sawa Nagano	2/11/2016	$450.00	2.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/11/2016	$450.00	4.00	7	drafted IPP's response to [redacted]
Sawa Nagano	2/12/2016	$450.00	4.00	7	per Lambrino's request, provided a memorandum on summaries o [redacted]
Sawa Nagano	2/12/2016	$450.00	3.50	7	drafted IPP's response [redacted]
Sawa Nagano	2/15/2016	$450.00	3.20	7	per Lambrino's request, searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/15/2016	$450.00	5.20	7	drafted IPP's response [redacted]
Sawa Nagano	2/16/2016	$450.00	4.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/16/2016	$450.00	4.00	7	drafted IPP's response [redacted]
Sawa Nagano	2/17/2016	$450.00	4.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/17/2016	$450.00	4.00	7	drafted IPP's response [redacted]
Sawa Nagano	2/18/2016	$450.00	4.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/18/2016	$450.00	3.50	7	drafted IPP's response [redacted]
Sawa Nagano	2/19/2016	$450.00	4.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/19/2016	$450.00	4.00	7	drafted IPP's response [redacted]
Sawa Nagano	2/22/2016	$450.00	3.20	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/22/2016	$450.00	5.20	7	drafted IPP's response [redacted]
Sawa Nagano	2/23/2016	$450.00	3.50	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/23/2016	$450.00	4.50	7	drafted IPP's response [redacted]
Sawa Nagano	2/24/2016	$450.00	8.50	7	searched, reviewed and provided summaries of [redacted]
Sawa Nagano	2/25/2016	$450.00	8.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/26/2016	$450.00	7.00	7	searched, reviewed and provided summaries [redacted]
Sawa Nagano	2/29/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/1/2016	$450.00	3.50	7	drafted IPP's response to [redacted]
Sawa Nagano	3/2/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/3/2016	$450.00	9.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/4/2016	$450.00	8.00	7	drafted IPP's response to [redacted]

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Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
Sawa Nagano	3/5/2016	$450.00	3.50	7	drafted IPP's response to [redacted]
Sawa Nagano	3/7/2016	$450.00	9.50	7	drafted IPP's response to [redacted]
Sawa Nagano	3/8/2016	$450.00	8.50	7	drafted IPP's response to [redacted]
Sawa Nagano	3/9/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/10/2016	$450.00	6.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/11/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/14/2016	$450.00	3.70	7	proofread draft translations [redacted]
Sawa Nagano	3/14/2016	$450.00	4.20	7	drafted IPP's response to [redacted]
Sawa Nagano	3/15/2016	$450.00	4.00	7	proofread draft translations [redacted]
Sawa Nagano	3/15/2016	$450.00	4.00	7	drafted IPP's response [redacted]
Sawa Nagano	3/16/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/17/2016	$450.00	3.20	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/17/2016	$450.00	4.70	7	drafted IPP's response [redacted]
Sawa Nagano	3/18/2016	$450.00	4.00	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/18/2016	$450.00	4.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/21/2016	$450.00	8.00	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/22/2016	$450.00	8.00	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/23/2016	$450.00	3.50	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/23/2016	$450.00	4.50	7	drafted IPP's response to [redacted]
Sawa Nagano	3/24/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/25/2016	$450.00	8.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/28/2016	$450.00	2.70	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/28/2016	$450.00	3.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/28/2016	$450.00	2.20	7	drafted IPP's response to [redacted]
Sawa Nagano	3/29/2016	$450.00	2.20	7	drafted IPP's response to [redacted]
Sawa Nagano	3/29/2016	$450.00	2.70	7	drafted IPP's response to [redacted]
Sawa Nagano	3/29/2016	$450.00	3.00	7	proofread draft translation [redacted]
Sawa Nagano	3/30/2016	$450.00	2.70	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/30/2016	$450.00	3.00	7	drafted IPP's response to [redacted]
Sawa Nagano	3/30/2016	$450.00	2.20	7	proofread draft translations [redacted]
Sawa Nagano	3/31/2016	$450.00	4.00	7	searched, reviewed and summarized [redacted]
Sawa Nagano	3/31/2016	$450.00	4.00	7	proofread draft translations [redacted]
Sawa Nagano	4/1/2016	$450.00	8.00	7	searched, reviewed and summarized [redacted]
Sawa Nagano	4/4/2016	$450.00	8.50	7	searched, reviewed and summarized [redacted]
Sawa Nagano	4/5/2016	$450.00	8.50	7	searched, reviewed and summarized [redacted]
Sawa Nagano	4/6/2016	$450.00	3.50	7	assisted Lambrinos [redacted]
Sawa Nagano	4/6/2016	$450.00	5.00	7	drafted response to [redacted]
Sawa Nagano	4/7/2016	$450.00	4.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/7/2016	$450.00	2.50	7	drafted response to [redacted]
Sawa Nagano	4/8/2016	$450.00	4.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/8/2016	$450.00	4.00	7	drafted response to [redacted]
Sawa Nagano	4/11/2016	$450.00	2.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/11/2016	$450.00	2.00	7	drafted response to [redacted]
Sawa Nagano	4/11/2016	$450.00	4.00	7	[redacted]
Sawa Nagano	4/12/2016	$450.00	3.20	7	assisted Lambrinos [redacted]
Sawa Nagano	4/12/2016	$450.00	2.00	7	drafted response to [redacted]
Sawa Nagano	4/12/2016	$450.00	2.70	7	proofread draft translations [redacted]
Sawa Nagano	4/13/2016	$450.00	0.70	7	attended a strategy conference call for [redacted]
Sawa Nagano	4/13/2016	$450.00	4.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/13/2016	$450.00	4.70	7	drafted response to [redacted]
Sawa Nagano	4/14/2016	$450.00	2.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/14/2016	$450.00	2.20	7	assisted Scarlet with [redacted]
Sawa Nagano	4/14/2016	$450.00	3.70	7	proofread draft translation [redacted]
Sawa Nagano	4/15/2016	$450.00	4.20	7	reviewed [redacted] documents
Sawa Nagano	4/15/2016	$450.00	2.20	7	assisted Lambrinos [redacted]
Sawa Nagano	4/18/2016	$450.00	2.20	7	assisted Lambrinos [redacted]

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Sawa Nagano	4/18/2016	$450.00	1.00	7	reviewed and summarized [redacted] documents
Sawa Nagano	4/18/2016	$450.00	5.20	7	proofread draft translations [redacted]
Sawa Nagano	4/19/2016	$450.00	4.00	7	assisted Lambrinos [redacted]
Sawa Nagano	4/19/2016	$450.00	5.00	7	proofread draft translations [redacted]
Sawa Nagano	4/20/2016	$450.00	7.00	7	proofread draft translation [redacted]
Sawa Nagano	4/21/2016	$450.00	8.50	7	assisted Lambrinos [redacted]
Sawa Nagano	4/22/2016	$450.00	3.00	7	proofread draft translations [redacted]
Sawa Nagano	4/22/2016	$450.00	4.00	7	reviewed and summarized [redacted] documents
Sawa Nagano	4/25/2016	$450.00	2.50	7	prepared for the [redacted] deposition
Sawa Nagano	4/25/2016	$450.00	3.50	7	reviewed and summarized [redacted] documents
Sawa Nagano	4/26/2016	$450.00	3.20	7	prepared for the [redacted] deposition
Sawa Nagano	4/26/2016	$450.00	1.70	7	reviewed and summarized [redacted] documents
Sawa Nagano	4/27/2016	$575.00	10.00	4	attended Shimizu (Panasonic) deposition and serve as a check translator
Sawa Nagano	4/28/2016	$575.00	9.00	4	attended Shimizu (Panasonic) deposition and serve as a check translator
Sawa Nagano	4/29/2016	$575.00	7.00	4	attended Shimizu (Panasonic) deposition and serve as a check translator
Sawa Nagano	4/29/2016	$450.00	3.00	7	reviewed and summarized [redacted] documents
Sawa Nagano	5/2/2016	$450.00	3.70	7	assisted Lambrinos [redacted]
Sawa Nagano	5/2/2016	$450.00	4.20	7	proofread draft translations [redacted]
Sawa Nagano	5/3/2016	$450.00	5.70	7	assisted Lambrinos [redacted]
Sawa Nagano	5/3/2016	$450.00	2.20	7	[redacted]
Sawa Nagano	5/4/2016	$450.00	5.70	7	drafted response to [redacted]
Sawa Nagano	5/4/2016	$450.00	2.20	7	assisted Lambrinos [redacted]
Sawa Nagano	5/5/2016	$450.00	9.00	7	assisted Lambrinos [redacted]
Sawa Nagano	5/6/2016	$450.00	1.50	7	drafted response to [redacted]
Sawa Nagano	5/6/2016	$450.00	2.20	7	proofread draft translations [redacted]
Sawa Nagano	5/6/2016	$450.00	3.20	7	follow up on review [redacted]
Sawa Nagano	5/9/2016	$450.00	6.70	7	drafted response [redacted]
Sawa Nagano	5/10/2016	$450.00	6.70	7	drafted response [redacted]
Sawa Nagano	5/11/2016	$450.00	8.50	7	drafted response [redacted]
Sawa Nagano	5/12/2016	$450.00	8.00	7	drafted response [redacted]
Sawa Nagano	5/13/2016	$450.00	4.00	7	drafted response [redacted]
Sawa Nagano	5/13/2016	$450.00	3.50	7	assisted Kim-Helms [redacted]
Sawa Nagano	5/16/2016	$450.00	4.70	7	drafted response to [redacted]
Sawa Nagano	5/16/2016	$450.00	3.70	7	filed Special Deposition Visa application
Sawa Nagano	5/17/2016	$450.00	5.00	7	drafted response [redacted]
Sawa Nagano	5/17/2016	$450.00	2.50	7	assisted Kim-Helms [redacted]
Sawa Nagano	5/18/2016	$450.00	3.70	7	drafted response [redacted]
Sawa Nagano	5/18/2016	$450.00	4.20	7	proofread draft translations [redacted]
Sawa Nagano	5/19/2016	$450.00	3.50	7	proofread draft translations [redacted]
Sawa Nagano	5/19/2016	$450.00	4.00	7	reviewed [redacted]
Sawa Nagano	5/20/2016	$450.00	4.50	7	proofread draft translations [redacted]
Sawa Nagano	5/20/2016	$450.00	4.00	7	reviewed [redacted]
Sawa Nagano	5/23/2016	$450.00	2.20	7	assisted Kim-Helms [redacted]
Sawa Nagano	5/23/2016	$450.00	2.50	7	proofread draft translations [redacted]
Sawa Nagano	5/23/2016	$450.00	3.20	7	searched and reviewed [redacted]
Sawa Nagano	5/24/2016	$450.00	8.00	7	searched and reviewed [redacted]
Sawa Nagano	5/25/2016	$450.00	4.20	7	searched and reviewed [redacted]
Sawa Nagano	5/25/2016	$450.00	4.20	7	assisted Lambrinos [redacted]
Sawa Nagano	5/26/2016	$450.00	3.70	7	assisted Lambrinos [redacted]
Sawa Nagano	5/26/2016	$450.00	4.20	7	searched and reviewed [redacted]
Sawa Nagano	5/27/2016	$450.00	3.50	7	proofread draft translations [redacted]
Sawa Nagano	5/27/2016	$450.00	4.00	7	searched and reviewed [redacted]
Sawa Nagano	5/30/2016	$450.00	4.20	7	assisted Kim-Helms [redacted]
Sawa Nagano	5/30/2016	$450.00	3.70	7	translated documents [redacted]
Sawa Nagano	5/31/2016	$450.00	3.70	7	assisted Kim-Helms [redacted]
Sawa Nagano	5/31/2016	$450.00	4.20	7	translated documents [redacted]
Sawa Nagano	6/1/2016	$450.00	4.20	7	assisted Kim-Helms [redacted]
Sawa Nagano	6/1/2016	$450.00	3.70	7	translated documents [redacted]
Sawa Nagano	6/2/2016	$450.00	5.20	7	proofread draft translations [redacted]

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Sawa Nagano	6/2/2016	$450.00	3.20	7	translated documents
Sawa Nagano	6/3/2016	$450.00	3.70	7	proofread draft translations
Sawa Nagano	6/3/2016	$450.00	3.70	7	searched and reviewed
Sawa Nagano	6/6/2016	$450.00	8.00	7	searched and reviewed
Sawa Nagano	6/7/2016	$450.00	4.00	7	assisted Skim-Helms
Sawa Nagano	6/7/2016	$450.00	4.00	7	search throughout the document and reviewed
Sawa Nagano	6/8/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	6/9/2016	$450.00	8.00	7	searched and reviewed production
Sawa Nagano	6/10/2016	$450.00	8.00	7	searched and reviewed
Sawa Nagano	6/13/2016	$450.00	9.00	7	searched and reviewed
Sawa Nagano	6/14/2016	$450.00	9.00	7	searched and reviewed
Sawa Nagano	6/15/2016	$450.00	9.00	7	searched and reviewed
Sawa Nagano	6/16/2016	$450.00	5.00	7	translated an employee profile
Sawa Nagano	6/16/2016	$450.00	4.00	7	searched and reviewed
Sawa Nagano	6/17/2016	$450.00	1.00	7	reviewed exhibits in preparation for the deposition in Osaka, Japan
Sawa Nagano	6/19/2016	$450.00	3.00	7	assisted Chan with the last minute search and review of hot documents, in preparation for the deposition in Osaka, Japan
Sawa Nagano	6/20/2016	$450.00	5.00	7	reviewed exhibits in preparation for the deposition in Osaka, Japan
Sawa Nagano	6/21/2016	$575.00	9.00	4	attended Nakae deposition (Panasonic) in Osaka, Japan, as a check interpreter
Sawa Nagano	6/22/2016	$575.00	9.00	4	attended Nakae deposition (Panasonic) in Osaka, Japan, as a check interpreter and assisted Chan with preparation of exhibits
Sawa Nagano	6/23/2016	$575.00	10.00	4	attended Nakae deposition (Panasonic) in Osaka, Japan, as a check interprete and assisted Chan with preparation of exhibits
Sawa Nagano	6/24/2016	$575.00	7.00	4	attended Nakae deposition (Panasonic) in Osaka, Japan, as a check interpreter and drafted a report on the Nakae deposition
Sawa Nagano	6/27/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	6/28/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	6/29/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	6/30/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	7/1/2016	$450.00	8.00	7	searched and reviewed productions
Sawa Nagano	7/4/2016	$450.00	1.00	7	drafted IPP's Second Response Deposition Translation Objections
Sawa Nagano	7/5/2016	$450.00	5.00	7	assisted Skim-Helms with drafting IPP's Second Response to Deposition Translation Objections
Sawa Nagano	7/5/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/6/2016	$450.00	11.00	7	searched and reviewed productions
Sawa Nagano	7/7/2016	$450.00	5.70	7	prepared for exhibits, in preparation for deposition
Sawa Nagano	7/7/2016	$450.00	4.20	7	searched and reviewed productions
Sawa Nagano	7/8/2016	$450.00	4.70	7	prepared for exhibits, in preparation for deposition
Sawa Nagano	7/8/2016	$450.00	4.20	7	searched and reviewed productions
Sawa Nagano	7/11/2016	$450.00	3.70	7	assisted with filling
Sawa Nagano	7/11/2016	$450.00	4.20	7	searched and reviewed ' productions
Sawa Nagano	7/12/2016	$450.00	2.00	7	translated Japanese documents into English,
Sawa Nagano	7/12/2016	$450.00	2.70	7	assisted with filling
Sawa Nagano	7/12/2016	$450.00	3.20	7	searched and reviewed productions
Sawa Nagano	7/13/2016	$450.00	4.00	7	translated Japanese documents into English
Sawa Nagano	7/13/2016	$450.00	4.00	7	searched and reviewed ' productions
Sawa Nagano	7/14/2016	$450.00	4.00	7	translated Japanese documents into English
Sawa Nagano	7/14/2016	$450.00	4.00	7	searched and reviewed productions

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Sawa Nagano	7/15/2016	$450.00	4.00	7	translated Japanese documents into English,
Sawa Nagano	7/15/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/18/2016	$450.00	4.00	7	translated Japanese documents into English,
Sawa Nagano	7/18/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/19/2016	$450.00	5.00	7	translated Japanese documents into English, to be used for the upcoming Horn (Expert) deposition
Sawa Nagano	7/19/2016	$450.00	4.00	7	searched and reviewed ' productions
Sawa Nagano	7/20/2016	$450.00	5.70	7	translated Japanese documents into English,
Sawa Nagano	7/20/2016	$450.00	4.20	7	searched and reviewed productions
Sawa Nagano	7/21/2016	$450.00	4.00	7	translated Japanese documents into English,
Sawa Nagano	7/21/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/22/2016	$450.00	1.20	7	Draft IPP's Response to Deposition Translation Objections
Sawa Nagano	7/22/2016	$450.00	1.70	7	proofread English translations of Japanese documents to be finalized as CTs
Sawa Nagano	7/22/2016	$450.00	2.00	7	assisted with filling
Sawa Nagano	7/25/2016	$450.00	1.70	7	proofread English translations of Japanese documents to be finalized as CTs
Sawa Nagano	7/25/2016	$450.00	2.00	7	assisted with filling
Sawa Nagano	7/25/2016	$450.00	4.20	7	searched and reviewed productions
Sawa Nagano	7/26/2016	$450.00	4.00	7	assisted with filling
Sawa Nagano	7/26/2016	$450.00	2.00	7	searched and reviewed productions
Sawa Nagano	7/26/2016	$450.00	2.00	7	searched and reviewed ' productions
Sawa Nagano	7/27/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/27/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	7/28/2016	$450.00	5.00	7	searched and reviewed productions
Sawa Nagano	7/28/2016	$450.00	4.50	7	searched and reviewed productions
Sawa Nagano	7/29/2016	$450.00	3.00	7	searched and reviewed productions
Sawa Nagano	7/29/2016	$450.00	3.50	7	searched and reviewed productions
Sawa Nagano	8/1/2016	$450.00	4.00	7	search and reviewed productions t
Sawa Nagano	8/1/2016	$450.00	4.50	7	searched and reviewed productions
Sawa Nagano	8/2/2016	$450.00	4.50	7	search and reviewed productions
Sawa Nagano	8/2/2016	$450.00	4.50	7	search and reviewed ' productions
Sawa Nagano	8/3/2016	$450.00	3.20	7	search and reviewed ' productions
Sawa Nagano	8/3/2016	$450.00	4.20	7	search and reviewed productions
Sawa Nagano	8/4/2016	$450.00	4.00	7	search and reviewed productions
Sawa Nagano	8/4/2016	$450.00	4.00	7	searched and reviewed productions
Sawa Nagano	8/5/2016	$450.00	3.50	7	search and reviewed productions
Sawa Nagano	8/5/2016	$450.00	3.50	7	search and reviewed productions
Sawa Nagano	8/8/2016	$450.00	4.00	7	drafted IPP's third response to translation objections to Motion for Summary Judgment exhibits
Sawa Nagano	8/8/2016	$450.00	2.00	7	search and reviewed productions)

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Sawa Nagano	8/8/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/9/2016	$450.00	4.00	7	drafted IPP's third response to [redacted] translation objections to Motion for Summary Judgment exhibits
Sawa Nagano	8/9/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/9/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/10/2016	$450.00	3.00	7	search and reviewed defendants' productions [redacted]
Sawa Nagano	8/10/2016	$450.00	2.00	7	[redacted]
Sawa Nagano	8/10/2016	$450.00	3.00	7	search and reviewed [redacted]' productions [redacted])
Sawa Nagano	8/11/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/11/2016	$450.00	2.20	7	search and reviewed [redacted]' productions [redacted])
Sawa Nagano	8/11/2016	$450.00	0.70	7	[redacted]
Sawa Nagano	8/11/2016	$450.00	1.20	7	[redacted]
Sawa Nagano	8/11/2016	$450.00	2.20	7	search and reviewed [redacted]' productions [redacted]
Sawa Nagano	8/12/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/12/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/12/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/12/2016	$450.00	2.00	7	search and reviewed [redacted] production [redacted]
Sawa Nagano	8/15/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/15/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/15/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/15/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/16/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/16/2016	$450.00	2.00	7	search and reviewed [redacted]' productions [redacted]
Sawa Nagano	8/16/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/16/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/17/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/17/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/17/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/17/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/18/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/18/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/18/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/18/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/19/2016	$450.00	1.50	7	proofread draft English translations for CTs
Sawa Nagano	8/19/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/19/2016	$450.00	2.50	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/19/2016	$450.00	2.00	7	search and reviewed [redacted] productions [redacted]
Sawa Nagano	8/22/2016	$450.00	3.50	7	proofread draft English translations for CTs
Sawa Nagano	8/22/2016	$450.00	6.50	7	[redacted]
Sawa Nagano	8/23/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/23/2016	$450.00	3.50	7	assisted with filling [redacted]
Sawa Nagano	8/24/2016	$450.00	5.00	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/24/2016	$450.00	3.00	7	assisted with filling [redacted]
Sawa Nagano	8/25/2016	$450.00	3.50	7	assisted with filling [redacted]

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Sawa Nagano	8/25/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/26/2016	$450.00	3.00	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/26/2016	$450.00	3.00	7	assisted with filling [redacted]
Sawa Nagano	8/29/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/29/2016	$450.00	4.00	7	assisted with filling [redacted]
Sawa Nagano	8/30/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted] deposition exhibits
Sawa Nagano	8/30/2016	$450.00	4.00	7	assisted with filling [redacted]
Sawa Nagano	8/31/2016	$450.00	3.50	7	assisted with filling [redacted]
Sawa Nagano	8/31/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/1/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/1/2016	$450.00	4.00	7	assisted with filling [redacted]
Sawa Nagano	9/2/2016	$450.00	3.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/2/2016	$450.00	4.50	7	assisted with filling [redacted]
Sawa Nagano	9/5/2016	$450.00	4.00	7	assisted with filling [redacted]
Sawa Nagano	9/5/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/6/2016	$450.00	3.50	7	assisted with filling [redacted]
Sawa Nagano	9/6/2016	$450.00	3.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/7/2016	$450.00	3.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/7/2016	$450.00	4.00	7	assisted with filling [redacted]
Sawa Nagano	9/8/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/8/2016	$450.00	4.50	7	assisted with filling [redacted]
Sawa Nagano	9/9/2016	$450.00	4.50	7	assisted with filling [redacted]
Sawa Nagano	9/9/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/12/2016	$450.00	8.50	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/13/2016	$450.00	8.50	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/14/2016	$450.00	4.50	7	translated hot documents for [redacted]
Sawa Nagano	9/14/2016	$450.00	3.50	7	[redacted]
Sawa Nagano	9/15/2016	$450.00	4.50	7	translated hot documents for [redacted]
Sawa Nagano	9/15/2016	$450.00	3.00	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/16/2016	$450.00	4.00	7	translated hot documents [redacted]
Sawa Nagano	9/16/2016	$450.00	3.50	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/19/2016	$450.00	7.00	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/20/2016	$450.00	8.00	7	[redacted], search and reviewed documents [redacted]
Sawa Nagano	9/21/2016	$450.00	8.50	7	search and reviewed hot documents in preparation for deposition of [redacted]
Sawa Nagano	9/22/2016	$450.00	2.50	7	assisted with filling in [redacted]
Sawa Nagano	9/22/2016	$450.00	2.50	7	translated hot documents into English
Sawa Nagano	9/22/2016	$450.00	4.50	7	search and reviewed hot documents in preparation for deposition of [redacted]
Sawa Nagano	9/23/2016	$450.00	3.50	7	[redacted] search and reviewed documents [redacted])
Sawa Nagano	9/23/2016	$450.00	3.50	7	search and reviewed hot documents in preparation for deposition of [redacted]
Sawa Nagano	9/26/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/27/2016	$450.00	3.50	7	assisted with filling [redacted]
Sawa Nagano	9/27/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted]

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Sawa Nagano	9/28/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/28/2016	$450.00	3.50	7	assisted with filling [redacted]
Sawa Nagano	9/29/2016	$450.00	7.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/30/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	9/30/2016	$450.00	4.00	7	proofread draft English translations for CTs
Sawa Nagano	10/3/2016	$450.00	5.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/3/2016	$450.00	3.00	7	proofread draft English translations for CTs
Sawa Nagano	10/4/2016	$450.00	3.50	7	proofread draft English translations for CTs
Sawa Nagano	10/4/2016	$450.00	4.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/5/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/6/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/7/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/10/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/11/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/12/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/13/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/14/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/17/2016	$450.00	8.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/18/2016	$450.00	3.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/22/2016	$450.00	5.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	10/29/2016	$450.00	3.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/7/2016	$450.00	0.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/8/2016	$450.00	0.50	7	conference with Shinae Kim-Helms regarding translation objection response and advised on plaintiffs' response
Sawa Nagano	11/8/2016	$450.00	1.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/9/2016	$450.00	1.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/10/2016	$450.00	1.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/11/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/15/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/16/2016	$450.00	1.50	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/19/2016	$450.00	4.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/23/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/24/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/28/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/29/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	11/30/2016	$450.00	1.00	7	drafted IPP's response to defendants' translation objections to [redacted]
Sawa Nagano	12/8/2016	$450.00	0.20	7	conference with Kim-Helms regarding translation objection response and advised on plaintiffs' response
Sawa Nagano	2/1/2017	$450.00	2.00	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/2/2017	$450.00	2.00	7	reviewed certified translations and draft IPP's response [redacted]
Sawa Nagano	2/3/2017	$450.00	1.50	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/4/2017	$450.00	5.00	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/5/2017	$450.00	0.50	7	reviewed certified translations and drafted IPP's response [redacted]

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Sawa Nagano	2/6/2017	$450.00	2.00	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/7/2017	$450.00	0.70	7	drafted IPP's response [redacted]
Sawa Nagano	2/7/2017	$450.00	1.00	7	assisted Shinae with dictionary definitions for a translation objection
Sawa Nagano	2/8/2017	$450.00	1.70	7	reviewed certified translations and draft IPP's response [redacted]
Sawa Nagano	2/9/2017	$450.00	2.20	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/10/2017	$450.00	2.00	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/11/2017	$450.00	6.20	7	reviewed certified translations and drafted IPP's response [redacted]
Sawa Nagano	2/13/2017	$450.00	1.50	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/14/2017	$450.00	2.00	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/15/2017	$450.00	1.50	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/16/2017	$450.00	2.00	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/17/2017	$450.00	1.50	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/18/2017	$450.00	5.50	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/20/2017	$450.00	6.00	7	reviewed certified translations and draft IPP's response to [redacted]
Sawa Nagano	2/23/2017	$450.00	0.20	7	assisted Shinae with dictionary definitions for a translation objection
Sawa Nagano	2/23/2017	$450.00	0.20	7	drafted IPP's response to [redacted]
William Harris	11/24/2014	$350.00	0.50	7	read and reviewed protective order and other introductory materials, executed and emailed same to Counsel
William Harris	11/25/2014	$350.00	7.00	7	Reviewed case materials, [redacted]
William Harris	11/26/2014	$350.00	1.00	7	exchanged emails with Counsel regarding scheduling supplemental training sessions and attended Catalyst training and review session
William Harris	12/1/2014	$350.00	3.50	7	T2 document review - [redacted] (3.3); email exchanges with Counsel regarding review project (.2)
William Harris	12/2/2014	$350.00	4.00	7	T2 document review - [redacted]
William Harris	12/3/2014	$350.00	7.50	7	T2 document review - [redacted]
William Harris	12/4/2014	$350.00	7.00	7	T2 document review - [redacted]
William Harris	12/5/2014	$350.00	6.00	7	T2 document review - [redacted]
William Harris	12/8/2014	$350.00	2.00	7	T2 document review - [redacted]
William Harris	12/9/2014	$350.00	6.50	7	T2 document review - [redacted] 6.2); email exchanges with Counsel regarding weekly conference call and list services (.3)
William Harris	12/10/2014	$350.00	7.00	7	T2 document review - [redacted]
William Harris	12/11/2014	$350.00	6.50	7	T2 document review - [redacted]
William Harris	12/12/2014	$350.00	8.00	7	T2 document review - [redacted]
William Harris	12/13/2014	$350.00	4.00	7	T2 document review - [redacted]
William Harris	12/14/2014	$350.00	3.50	7	T2 document review - [redacted]
William Harris	12/15/2014	$350.00	10.00	7	T2 document review - [redacted] 9.5); email exchange with Counsel regarding document review platform functionality (.5)
William Harris	12/16/2014	$350.00	3.00	7	T2 document review - [redacted] (2); experienced some technical problems (.5); weekly conference call held and participated in same (.5)
William Harris	12/17/2014	$350.00	9.00	7	T2 document review - [redacted]
William Harris	12/18/2014	$350.00	5.50	7	T2 document review - [redacted]
William Harris	12/24/2014	$350.00	6.00	7	T2 document review - [redacted]
William Harris	12/25/2014	$350.00	4.50	7	T2 document review - [redacted]
William Harris	12/26/2014	$350.00	4.00	7	T2 document review - [redacted]

Kirby McInerney LLP
In re Lithium Ion Batteries Antitrust Litigation
Contemporaneous Time Records
June 1, 2013 through February 28, 2017

Timekeeper	Transaction Date	Bill Rates	Time Rounded	New Activity	Description
William Harris	12/27/2014	$350.00	3.50	7	T2 document review - [redacted]
William Harris	12/28/2014	$350.00	0.50	7	telecon and message exchange with counse[redacted]
William Harris	12/29/2014	$350.00	8.50	7	T2 document review - [redacted] (8.3); read and reviewed counsel's email regarding scheduling of conference call (.2)
William Harris	12/30/2014	$350.00	10.00	7	T2 document review - [redacted]
William Harris	12/31/2014	$350.00	5.00	7	T2 document review - [redacted]
William Harris	1/2/2015	$350.00	4.00	7	T2 document review - [redacted]
William Harris	1/3/2015	$350.00	4.00	7	T2 document review - [redacted]
William Harris	1/4/2015	$350.00	2.50	7	T2 document review - [redacted]
William Harris	1/5/2015	$350.00	4.00	7	T2 document review - [redacted] (3.8); email exchanges with Counsel regarding stauts of the review (.2)
William Harris	1/6/2015	$350.00	0.50	7	weekly status conference call held regarding batches and hot documents and assignments
William Harris	1/7/2015	$350.00	4.00	7	T2 document review - [redacted]
William Harris	1/8/2015	$350.00	1.50	7	experienced significant technical problems (server interruptions) in attempting to read and review documents for conspiracy evidence (1); email exchanges with Counsel regarding same (.5)
William Harris	1/12/2015	$350.00	1.50	7	T2 document review - [redacted]
William Harris	1/13/2015	$350.00	7.50	7	T2 document review - [redacted] (7); participated in weekly call regarding project status update (.5)
William Harris	1/14/2015	$350.00	7.00	7	T2 document review - [redacted]
William Harris	1/15/2015	$350.00	9.00	7	T2 document review - [redacted]
William Harris	1/16/2015	$350.00	10.00	7	T2 document review - [redacted]
William Harris	1/19/2015	$350.00	7.00	7	T2 document review - [redacted]
William Harris	1/20/2015	$350.00	10.00	7	T2 document review - [redacted] (9); participated in weekly state conference (.5); emailed Counsel regarding same (.2); emailed Counsel to request additional documents (.3)
William Harris	1/21/2015	$350.00	10.00	7	T2 document review - [redacted] (9.8); email exchange with Counsel regarding updated assignments (.2)
William Harris	1/22/2015	$350.00	10.00	7	T2 document review - [redacted]
William Harris	1/23/2015	$350.00	3.00	7	T2 document review - [redacted]
William Harris	1/26/2015	$350.00	8.00	7	T2 document review - [redacted] (7.5); emailed Counsel regarding status update (.5)
Grand Total			4,003.20		

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
KIRBY MCINERNEY LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	$125,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	8,946.20
Miscellaneous	
TOTAL:	$133,946.20

EXHIBIT 36

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF RALPH B. KALFAYAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KKBS**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Ralph B. Kalfayan, declare:

1. I am a partner at Krause Kalfayan Benink & Slavens, LLP ("KKBS"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Steven Bugge ("Bugge") and as counsel for IPPs throughout the course of this litigation. The background and experience of KKBS and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, KKBS performed the following work: KKBS marshaled declarations and extensive discovery from its client, class representative Steven Bugge, prepared for and defended Bugge's deposition, analyzed settlements, and diligently and thoroughly communicated with its client.

5. A summary of work performed by KKBS and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Ralph B. Kalfayan in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of KKBS and filed on May 26, 2017. (ECF No. 1813-23). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by KKBS since June 1, 2013 was 125.50, with a corresponding lodestar based on current rates is $61,600.

7. Attached hereto as **Exhibit B** is a summary of the expenses KKBS has incurred from June 1, 2013 to present, plus applicable case filing fees. KKBS expended a total of $2,115.29

in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by KKBS on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by KKBS in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 1, 2019 at Del Mar, California.

/s/ Ralph B. Kalfayan

Ralph B. Kalfayan

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP

www.kkbs-law.com

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP ("Krause Kalfayan") is a leading San Diego-based class-action law firm. Krause Kalfayan, Benink & Slavens, LLP (formerly Krause & Kalfayan) represents individuals, businesses, and institutional investors in complex civil litigation in the areas of securities, antitrust, consumer fraud, partnership and business law. Although the firm handles both individual and class action litigation, it has a substantial reputation as a class action firm and has been at the forefront of multi-million dollar cases against some of the most powerful companies in the world. Krause Kalfayan has obtained numerous significant settlements and judgments for individuals and businesses in California and the United States. In recent years, the firm has expanded its practice to consumer and unfair competition cases and has obtained substantial results benefitting consumers.

RALPH B. KALFAYAN

Ralph B. Kalfayan received a Bachelor of Science degree in Accounting from the University of San Diego in 1982. He was a member of the honors fraternity Beta Alpha Psi on campus and graduated with honors in his major. He received his Juris Doctor degree in 1985, and his Master of Laws degree with an emphasis in intellectual property in 2012 from University of San Diego School of Law.

Upon graduation, Mr. Kalfayan was employed for three years with the international firm of Arthur Andersen & Co. Mr. Kalfayan worked in the tax department, where he provided tax consulting and tax compliance work and in the audit department, where he reviewed financial statements and helped issue audit opinions.

In 1988, Mr. Kalfayan joined the law firm of Borton, Petrini & Conron, where he became a partner in 1991. Mr. Kalfayan specialized in business litigation and transactional matters including real estate transactions, general commercial transactions, corporate work, partnership work, tax litigation or consulting work, contract disputes, and large acquisition work. Mr. Kalfayan also handled a number of civil trials before a jury and several major appeals.

In August 1993, Mr. Kalfayan became Of Counsel at the Law Offices of James C. Krause, and in January 1994, he became a member of Krause & Kalfayan.

Among the articles Mr. Kalfayan has authored are: Ensuring Access to Affordable Medication: The Supreme Court's Opinion in F.T.C. v. Actavis, Inc. (Summer 2013) in Competition: The Journal of the Antitrust and Unfair Competition Law Section of the State Bar of California Vol. 22, No. 2; Buying a Business (April 15, 1993) in Business and Industry News Vol. 3, No. 2; Building a Business: Tools for the Entrepreneur (August 1, 1993) In Business & Industry News Vol. 3, Number 9; Reducing your Property Taxes in the San Diego Business and tax forecast magazine, December 1991. Seminars conducted by Mr. Kalfayan include: California Sales & Use Tax, Lorman Education Services, December 5, 1991; Business and Finance Conference at Jack Murphy Stadium, December 5, 1990; Estate Planning with Prudential Bache, Spring of 1990.

Mr. Kalfayan has proven himself as a successful litigator. He was on the Executive Committee in the matter of *In re Dynamic Random Access Memory (DRAM),* Master File No. M-02-1486-PJH, MDL No. 1486, United States District Court Northern District of California, Oakland Division, which was an indirect purchaser case under the antitrust laws, and settled for over $300 million; *In re Korean Airlines Co. Ltd Antitrust Litigation,* Master File No. CV 07-05107, MDL No. 1891, United States District Court Central District of California, Western Division, which was a direct purchaser case under the antitrust laws, and settled for over $85

million; *In re Wholesale Electricity Cases I and II*, JCCP 4204, San Diego County Superior Court, which was an indirect purchaser case under the antitrust laws, and settled in amount in excess of $200 million; *In re Natural Gas Anti-Trust Cases I, II, III, IV & V*, San Diego Superior Court, JCCP Nos. 4221, 4224, 4226, 4228, and which resulted in settlements of $159 million for plaintiffs. In addition, Mr. Kalfayan successfully obtained a jury verdict in *Emma R. Carbonell, MD, et al. v. Kern Medical Services, Inc., et al.,* in the amount of $1,504,594.30. He achieved a settlement in the amount of $1 million in the case of *Gordon Giles v. Weiss Family Trust, et. al.,* and achieved a settlement in the amount of $625,000 in *Sylvia Ortega v. La Estrella Night Club, et. al..,* He also reached a settlement in the amount of $4.5 million in *Doe v. Roes*, Finally, he also achieved a settlement of $500,000 in *Stewart v GOGO, Inc. Antitrust Litigation*, US District Court Northern District of California, Case No. 3:12-cv-5164-EMC.

Mr. Kalfayan currently works on numerous class actions, including: *In re Antelope Valley Groundwater Litigation*, JCCP 4408, Los Angeles County Superior Court Case Number BC 391869, representing over 70,000 non-pumping landowners in the largest groundwater adjudication in the State of California where the water rights were valued at over one billion dollars; *In Re Cipro I and II*, JCCP 4154 and 4220, in San Diego County Superior Court, where the case was successfully argued before the California Supreme Court, resulting in a published opinion which set the standard for pay-for-delay cases under the Cartwright Act for the State of California, and resulted in a partial settlement with one defendant in the amount of $74,000,000; *In re Allergan*, Civil Case Number 15-307, United States District Court, Central District of California Southern Division; *In re Lithium Batteries*, Case No. C12-6492 EMC, United States District Court Northern District of California; *In re Processed Egg Indirect Purchaser Antitrust Litigation*, United States District Court Eastern District of Pennsylvania, MDL 2002; and, *Dang v*

National Football League Indirect Purchaser Antitrust litigation, United States District Court Northern District of California, Case No. 5:12-cv-5481-EJD.

ERIC J. BENINK

Mr. Benink was admitted to the California Bar in 1997. He received a Bachelor of Business Administration degree from the University of Massachusetts - Amherst in 1992 and a Juris Doctor and Master of Business Administration degree from the University of San Diego in 1996.

In 1997, Mr. Benink began working in the Enforcement Division of the Department of Corporations, an entity that serves as California's securities, commodities, franchise; and finance and mortgage lender regulator. He investigated dozens of illegal stock offerings, private placement frauds, illicit brokerage practices, and ponzi schemes, and brought civil and administrative actions against the perpetrators. He also worked closely with criminal agencies in their prosecution of alleged violators of laws under the jurisdiction of the Department.

In 2002, Mr. Benink joined Krause & Kalfayan as an Associate, and represents consumers, businesses and shareholders in securities, consumer fraud, and business litigation actions in state and federal court. He has prosecuted consumer and business litigation cases against Wells Fargo Bank, Sprint, Ticketmaster, Fleet Bank, and Apple. Mr. Benink represents hedge funds in securities actions, as well as investors in FINRA arbitrations. In 2005, Mr. Benink became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Benink is the author of *The Model State Commodities Code, A Regulator's Perspective*, published in the Law Enforcement Reporter, Winter 1999. He has testified as a securities expert witness for the San Diego District Attorney's Office and has been appointed by the San Diego Superior Court as a receiver in three securities fraud cases. Mr. Benink is a member of the San Diego County Bar Association, the Consumer Attorneys of San Diego, a graduate of LEAD San

Diego, and former President of the Old Mission Rotary Club (2009 - 2010). He is a member of the Board of Directors for the George G. Glenner Alzheimer's Centers, Inc. He is also a contributor to the *Trial Bar News*, a publication of the Consumer Attorneys of San Diego.

Mr. Benink acted as Lead Counsel in *Shames v. City of San Diego*, (San Diego Superior Court, Case No. GIC 831539), a class action that recovered $40 million for residential sewer customers. He has prosecuted numerous class actions cases, including: *Soto v. STI Prepaid, LLC* (San Diego Superior Court, Case No. GIC868083) (violation of prepaid calling card statute); *Neborsky v. Redem Technologies, Inc*. (San Diego Superior Court, Case No. GIC804280) (securities fraud); *Milne v. Ticket Innovations, Inc*. (breach of fiduciary duty to shareholders) (Los Angeles Superior Court, BC 311258); *Ruffalo v. En Pointe Technologies, Inc*. (United States District Court for Southern District of California, 3:01-cv-00205 BEN-AJB) (federal securities fraud); and, *Rivera v. Sprint International Communications Corp*. (San Diego Superior Court, GIC799868) (international phone overcharges). He also represents rate payors in cases involving illegal utility fees in violation of Proposition 218.

VINCENT D. SLAVENS

Mr. Slavens was admitted to the California Bar in 2001. He received his Bachelor of Arts degree in Corporate Finance from San Diego State University in 1994 and graduated with honors (*magna cum laude*) from California Western School of Law in 2001.

Prior to law school, he worked as a licensed investment broker for a number of years. During law school, Mr. Slavens successfully became a member of the California Western School of Law, Law Review. After becoming a member of the California Bar in 2001, he joined Krause & Kalfayan as an Associate Attorney, and has put his securities experience to use in securities litigation, including arbitration matters with the National Association of Securities Dealers

(NASD), now known as FINRA. He has also been involved in class action cases in securities, antitrust, and consumer law. In 2005, he became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Slavens has been active in the legal community by volunteering with the San Diego Volunteer Lawyer Program, where he participated as a panelist on issues relating to the brokerage industry and corporate scandals; furthermore, he has provided substantial *pro bono* services to a local non-profit organization. He has also written an article on whistle-blower standing under the RICO statutes, as well as an article titled "They Heard It Through The Grapevine," which was accepted for publication in Trial Bar News.

Mr. Slavens has acted as Lead Associate in class actions such as Glea F. Bobbs v. Southern Pacific Equities, LLC, (alleging securities law violations - with settlements over $7.75 million). He also handled an arbitration on behalf of nearly 20 investors in Larner, et al v. Wedbush Morgan Securities, *et al* (alleging misrepresentations and violation of securities laws).

Mr. Slavens has also handled more than thirteen arbitrations and has obtained more than $3,000,000 in settlements or awards. He has represented investors in the following securities cases:

- *Rogers v. Fisher Investment Advisors, Inc., (Arb. No. 73 169 00187 03 JMLE) Arbitration before the American Arbitration Association.* The firm represented an investor who had hired an investment advisor to manage his money prudently. The firm claimed that Fisher Investments breached its contract and was negligent when it invested nearly all of Rogers' assets in the stock market contrary to his stated objectives, resulting in a significant loss. The firm successfully obtained an award at arbitration in favor of client in amount of $142,210.85.

- *Johnson v. Clements Company Investment Advisors, Inc., (Arb. No. 01-04915) Arbitration before the National Association of Securities Dealers.* The firm represented investors against a brokerage firm and claimed that the broker recommended investments which were not suitable in view of the clients stated objectives and risk tolerance. The case has settled.

- *Johnsons v. Standex Int'l Corp., dba The Berean Christian Stores, (GIC 797402) Superior Court, San Diego, California.* The firm represented investors against a bookstore and claimed that it held an investment broker out as its employee or agent and that the book store was vicariously liable under a theory of ostensible agency. The case has settled.

- *Persico v. Sands Bros., Inc.,* (Arb. No. 01-04617) *Arbitration before the National Association of Securities Dealers*. The firm represented an investors against a brokerage firm and claimed that the broker traded stocks in his account without authorization. The case has settled.

- *Mendelsohn v. Seaboard Securities, Inc., et. al.* (Arb. No. 02-01976) *Arbitration before the National Association of Securities Dealers*. The firm represented an investor against a brokerage firm and claimed that the broker recommended an investment in a "short position" which was highly speculative and not suitable in view of the clients stated objectives and risk tolerance. The case settled.

- *Carolyn Hamburger, et al v. Morgan Stanley DW, et al,* (Arb. No. 02-01976) *Arbitration before the National Association of Securities Dealers*.

The firm represented investors against a brokerage firm and claimed that the broker recommended an investment program that was speculative and not suitable in view of the clients stated objectives and risk tolerance, and that the broker excessively traded the accounts (*i.e.* "churning"). The case settled.

- *Gladys F. Prince v. McCarn's Allstate Finance, Inc.,* (GIC 805084) Superior Court, San Diego, California. The firm represented investors against an investment advisor and claimed that the broker violated California law by offering and selling unregistered securities to Ms. Prince. The case settled.

VENEETA JASWAL

Veneeta Jaswal received her Juris Doctor degree from the University of San Diego School of Law in 2017 with a concentration in Business and Corporate Law. In 2014, Ms. Jaswal graduated from San Jose State University with a Bachelor of Science in Justice Studies where she was recognized as a Dean' s Scholar. Ms. Jaswal was admitted to the state bar of California in 2018.

While in law school, Ms. Jaswal authored An Evidence Law Approach to Abortion Informed Consent, published in Laws: Intersection of Human Rights Law and Health Law, 2017. Ms. Jaswal also worked as a Research Assistant for Professor Dov Fox, researching various aspects of reproductive law in an effort to articulate a new cause of action. She additionally interned at San Diego Corporate Law where she gained transactional experience with entity formation and document drafting. She also interned with NeuraLace Medical, a San Diego start-up, where she assisted with licensing technology, FDA clearance, and patent applications. Ms.

Jaswal worked as a Law Clerk at TechLaw, LLP where she participated in litigation and transactional matters, including breach of contract, gross negligence, and responding to USPTO actions on trademark applications.

Ms. Jaswal joined Krause Kalfayan Benink & Slavens as an associate attorney in March 2018. Her practice focuses on class actions, antitrust, and business and commercial litigation.

IAN D. KRUPAR

Mr. Krupar graduated from Tufts University in Medford, Massachusetts in May 2010 earning a B.A. in Quantitative Economics and minor in Political Science. Mr. Krupar then obtained his Juris Doctor degree from the University of San Diego School of Law in May 2013. Since graduation from USD Law Mr. Krupar has worked at KKBS as Mr. Kalfayan's law clerk. Mr. Krupar's educational background in economics has helped KKBS's antitrust and class action clients achieve enormous success as evidenced by his work on the firm's numerous cases undertaken and continued during his tenure at KKBS. These cases include but are not limited to: *In re Antelope Valley Groundwater Litigation*, JCCP 4408, Los Angeles County Superior Court Case No. BC 391869 (currently on appeal), *In Re Cipro I and II*, JCCP 4154 and 4220, where the California Supreme Court declined to overturn a more than $300 million total settlement; *In re Allergan*, Civil Case Number 15-307, United State District Court Central District of California Southern Division; *Dang v. National Football League Indirect Purchaser Antitrust Litigation*, United States District Court Northern District of California, Case No. 5:12-cv-5481-EJD. Mr. Krupar also actively works and aids the efforts of KKBS on its non-class cases – such as the most recent *Lopez v. Luquin, et al.* San Diego Superior Court of California Case No. 37-2017-000222184-CU-NP-CTL (currently awaiting decision as of March 29, 2019). Mr. Krupar is preparing for the July 2019 California Bar Exam.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
Krause Kalfayan Benink & Slavens, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	255.00
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	25.40
Photocopies – Outside	
Postage	0.48
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	1,390.51
Miscellaneous	443.90
TOTAL:	$2,115.29

EXHIBIT 37

Ralph B. Kalfayan (SBN #133464)
KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP
550 West C Street, Suite 530
San Diego, California 92101
Telephone: 619-232-0331
Facsimile: 619-232-4019

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF RALPH B. KALFAYAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP**

I, Ralph B. Kalfayan, declare:

1. I am a partner at Krause, Kalfayan, Benink & Slavens LLP ("KKBS"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Steven Bugge ("Bugge") and as counsel for IPPs throughout the course of this litigation. The background and experience of KKBS and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, KKBS performed the following work: KKBS marshaled declarations and extensive discovery from its client, class representative Steven Bugge, prepared for and defended Bugge's deposition, analyzed settlements, and diligently and thoroughly communicated with its client.

5. Attached hereto as **Exhibit B** is a billing summary of KKBS' total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by KKBS during this period of time was 125.50 hours, with a corresponding lodestar based on current rates of $61,600. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by KKBS.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses KKBS has incurred during the course of this litigation. KKBS expended a total of $2,115.29 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by KKBS on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at San Diego, CA.

/s/ Ralph B. Kalfayan

Ralph B. Kalfayan

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP

www.kkbs-law.com

KRAUSE, KALFAYAN, BENINK & SLAVENS, LLP ("Krause Kalfayan") is a leading San Diego-based class-action law firm. Krause Kalfayan, Benink & Slavens, LLP (formerly Krause & Kalfayan) represents individuals, businesses, and institutional investors in complex civil litigation in the areas of securities, antitrust, consumer fraud, partnership and business law. Although the firm handles both individual and class action litigation, it has a substantial reputation as a class action firm and has been at the forefront of multi-million dollar cases against some of the most powerful companies in the world. Krause Kalfayan has obtained numerous significant settlements and judgments for individuals and businesses in California and the United States. In recent years, the firm has expanded its practice to consumer and unfair competition cases, and has obtained substantial results benefitting consumers.

RALPH B. KALFAYAN

Ralph B. Kalfayan received a Bachelor of Science degree in Accounting from the University of San Diego in 1982. He was a member of the honors fraternity Beta Alpha Psi on campus and graduated with honors in his major. He received his Juris Doctor degree in 1985, and his Master of Laws degree with an emphasis in intellectual property in 2012 from University of San Diego School of Law.

Upon graduation, Mr. Kalfayan was employed for three years with the international firm of Arthur Andersen & Co. Mr. Kalfayan worked in the tax department, where he provided tax consulting and tax compliance work and in the audit department, where he reviewed financial statements and helped issue audit opinions.

In 1988, Mr. Kalfayan joined the law firm of Borton, Petrini & Conron, where he became a partner in 1991. Mr. Kalfayan specialized in business litigation and transactional matters including real estate transactions, general commercial transactions, corporate work, partnership work, tax litigation or consulting work, contract disputes, and large acquisition work. Mr. Kalfayan also handled a number of civil trials before a jury and several major appeals.

In August 1993, Mr. Kalfayan became Of Counsel at the Law Offices of James C. Krause, and in January 1994, he became a member of Krause & Kalfayan.

Among the articles Mr. Kalfayan has authored are: Ensuring Access to Affordable Medication: The Supreme Court's Opinion in F.T.C. v. Actavis, Inc. (Summer 2013) in Competition: The Journal of the Antitrust and Unfair Competition Law Section of the State Bar of California Vol. 22, No. 2; Buying a Business (April 15, 1993) in Business and Industry News Vol. 3, No. 2; Building a Business: Tools for the Entrepreneur (August 1, 1993) In Business & Industry News Vol. 3, Number 9; Reducing your Property Taxes in the San Diego Business and tax forecast magazine, December 1991. Seminars conducted by Mr. Kalfayan include: California Sales & Use Tax, Lorman Education Services, December 5, 1991; Business and Finance Conference at Jack Murphy Stadium, December 5, 1990; Estate Planning with Prudential Bache, Spring of 1990.

Mr. Kalfayan has proven himself as a successful litigator. He was on the Executive Committee in the matter of *In re Dynamic Random Access Memory (DRAM)*, Master File No. M-02-1486-PJH, MDL No. 1486, United States District Court Northern District of California, Oakland Division, which was an indirect purchaser case under the antitrust laws, and settled for over $300 million; *In re Korean Airlines Co. Ltd Antitrust Litigation*, Master File No. CV 07-05107, MDL No. 1891, United States District Court Central District of California, Western Division, which was a direct purchaser case under the antitrust laws, and settled for over $85

million; *In re Wholesale Electricity Cases I and II*, JCCP 4204, San Diego County Superior Court, which was an indirect purchaser case under the antitrust laws, and settled in amount in excess of $200 million; *In re Natural Gas Anti-Trust Cases I, II, III, IV & V*, San Diego Superior Court, JCCP Nos. 4221, 4224, 4226, 4228, and which resulted in settlements of $159 million for plaintiffs. In addition, Mr. Kalfayan successfully obtained a jury verdict in *Emma R. Carbonell, MD, et al. v. Kern Medical Services, Inc., et al.*, in the amount of $1,504,594.30. He achieved a settlement in the amount of $1 million in the case of *Gordon Giles v. Weiss Family Trust, et. al.* , and achieved a settlement in the amount of $625,000 in *Sylvia Ortega v. La Estrella Night Club, et. al..*, He also reached a settlement in the amount of $4.5 million in *Doe v. Roes*, Finally, he also achieved a settlement of $500,000 in *Stewart v GOGO, Inc. Antitrust Litigation*, US District Court Northern District of California, Case No. 3:12-cv-5164-EMC.

Mr. Kalfayan currently works on numerous class actions, including: *In re Antelope Valley Groundwater Litigation*, JCCP 4408, Los Angeles County Superior Court Case Number BC 391869, representing over 70,000 non-pumping landowners in the largest groundwater adjudication in the State of California where the water rights were valued at over one billion dollars; *In Re Cipro I and II*, JCCP 4154 and 4220, in San Diego County Superior Court, where the case was successfully argued before the California Supreme Court, resulting in a published opinion which set the standard for pay-for-delay cases under the Cartwright Act for the State of California, and resulted in a partial settlement with one defendant in the amount of $74,000,000; *In re Allergan*, Civil Case Number 15-307, United States District Court, Central District of California Southern Division; *In re Lithium Batteries*, Case No. C12-6492 EMC, United States District Court Northern District of California; *In re Processed Egg Indirect Purchaser Antitrust Litigation*, United States District Court Eastern District of Pennsylvania, MDL 2002; and, *Dang v*

National Football League Indirect Purchaser Antitrust litigation, United States District Court Northern District of California, Case No. 5:12-cv-5481-EJD.

ERIC J. BENINK

Mr. Benink was admitted to the California Bar in 1997. He received a Bachelor of Business Administration degree from the University of Massachusetts - Amherst in 1992 and a Juris Doctor and Master of Business Administration degree from the University of San Diego in 1996.

In 1997, Mr. Benink began working in the Enforcement Division of the Department of Corporations, an entity that serves as California's securities, commodities, franchise; and finance and mortgage lender regulator. He investigated dozens of illegal stock offerings, private placement frauds, illicit brokerage practices, and ponzi schemes, and brought civil and administrative actions against the perpetrators. He also worked closely with criminal agencies in their prosecution of alleged violators of laws under the jurisdiction of the Department.

In 2002, Mr. Benink joined Krause & Kalfayan as an Associate, and represents consumers, businesses and shareholders in securities, consumer fraud, and business litigation actions in state and federal court. He has prosecuted consumer and business litigation cases against Wells Fargo Bank, Sprint, Ticketmaster, Fleet Bank, and Apple. Mr. Benink represents hedge funds in securities actions, as well as investors in FINRA arbitrations. In 2005, Mr. Benink became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Benink is the author of *The Model State Commodities Code, A Regulator's Perspective*, published in the Law Enforcement Reporter, Winter 1999. He has testified as a securities expert witness for the San Diego District Attorney's Office and has been appointed by the San Diego Superior Court as a receiver in three securities fraud cases. Mr. Benink is a member of the San Diego County Bar Association, the Consumer Attorneys of San Diego, a graduate of LEAD San

Diego, and former President of the Old Mission Rotary Club (2009 - 2010). He is a member of the Board of Directors for the George G. Glenner Alzheimer's Centers, Inc. He is also a contributor to the *Trial Bar News*, a publication of the Consumer Attorneys of San Diego.

Mr. Benink acted as Lead Counsel in *Shames v. City of San Diego*, (San Diego Superior Court, Case No. GIC 831539), a class action that recovered $40 million for residential sewer customers. He has prosecuted numerous class actions cases, including: *Soto v. STI Prepaid, LLC* (San Diego Superior Court, Case No. GIC868083) (violation of prepaid calling card statute); *Neborsky v. Redem Technologies, Inc*. (San Diego Superior Court, Case No. GIC804280) (securities fraud); *Milne v. Ticket Innovations, Inc*. (breach of fiduciary duty to shareholders) (Los Angeles Superior Court, BC 311258); *Ruffalo v. En Pointe Technologies, Inc*. (United States District Court for Southern District of California, 3:01-cv-00205 BEN-AJB) (federal securities fraud); and, *Rivera v. Sprint International Communications Corp*. (San Diego Superior Court, GIC799868) (international phone overcharges). He also represents rate payors in cases involving illegal utility fees in violation of Proposition 218.

VINCENT D. SLAVENS

Mr. Slavens was admitted to the California Bar in 2001. He received his Bachelor of Arts degree in Corporate Finance from San Diego State University in 1994, and graduated with honors (*magna cum laude*) from California Western School of Law in 2001.

Prior to law school, he worked as a licensed investment broker for a number of years. During law school, Mr. Slavens successfully became a member of the California Western School of Law, Law Review. After becoming a member of the California Bar in 2001, he joined Krause & Kalfayan as an Associate Attorney, and has put his securities experience to use in securities litigation, including arbitration matters with the National Association of Securities Dealers

(NASD), now known as FINRA. He has also been involved in class action cases in securities, antitrust, and consumer law. In 2005, he became a partner in the firm, which was renamed Krause, Kalfayan, Benink & Slavens, LLP.

Mr. Slavens has been active in the legal community by volunteering with the San Diego Volunteer Lawyer Program, where he participated as a panelist on issues relating to the brokerage industry and corporate scandals; furthermore, he has provided substantial *pro bono* services to a local non-profit organization. He has also written an article on whistle-blower standing under the RICO statutes, as well as an article titled "They Heard It Through The Grapevine," which was accepted for publication in Trial Bar News.

Mr. Slavens has acted as Lead Associate in class actions such as Glea F. Bobbs v. Southern Pacific Equities, LLC, (alleging securities law violations - with settlements over $7.75 million). He also handled an arbitration on behalf of nearly 20 investors in Larner, et al v. Wedbush Morgan Securities, *et al* (alleging misrepresentations and violation of securities laws).

Mr. Slavens has also handled more than thirteen arbitrations and has obtained more than $3,000,000 in settlements or awards. He has represented investors in the following securities cases:

- *Rogers v. Fisher Investment Advisors, Inc., (Arb. No. 73 169 00187 03 JMLE) Arbitration before the American Arbitration Association.* The firm represented an investor who had hired an investment advisor to manage his money prudently. The firm claimed that Fisher Investments breached its contract and was negligent when it invested nearly all of Rogers' assets in the stock market contrary to his stated objectives, resulting in a significant loss. The firm successfully obtained an award at arbitration in favor of client in amount of $142,210.85.

- *Johnson v. Clements Company Investment Advisors, Inc., (Arb. No. 01-04915) Arbitration before the National Association of Securities Dealers.* The firm represented investors against a brokerage firm, and claimed that the broker recommended investments which were not suitable in view of the clients stated objectives and risk tolerance. The case has settled.

- *Johnsons v. Standex Int'l Corp., dba The Berean Christian Stores, (GIC 797402) Superior Court, San Diego, California.* The firm represented investors against a bookstore, and claimed that it held an investment broker out as its employee or agent and that the book store was vicariously liable under a theory of ostensible agency. The case has settled.

- *Persico v. Sands Bros., Inc.,* (Arb. No. 01-04617) *Arbitration before the National Association of Securities Dealers*. The firm represented an investors against a brokerage firm and claimed that the broker traded stocks in his account without authorization. The case has settled.

- *Mendelsohn v. Seaboard Securities, Inc., et. al.* (Arb. No. 02-01976) *Arbitration before the National Association of Securities Dealers*. The firm represented an investor against a brokerage firm and claimed that the broker recommended an investment in a "short position" which was highly speculative and not suitable in view of the clients stated objectives and risk tolerance. The case settled.

- *Carolyn Hamburger, et al v. Morgan Stanley DW, et al,* (Arb. No. 02-01976) *Arbitration before the National Association of Securities Dealers*.

The firm represented investors against a brokerage firm and claimed that the broker recommended an investment program that was speculative and not suitable in view of the clients stated objectives and risk tolerance, and that the broker excessively traded the accounts (*i.e.* "churning"). The case settled.

- *Gladys F. Prince v. McCarn's Allstate Finance, Inc.*, (GIC 805084) Superior Court, San Diego, California. The firm represented investors against an investment advisor and claimed that the broker violated California law by offering and selling unregistered securities to Ms. Prince. The case settled.

PHILLIP E. STEPHAN

Phillip E. Stephan earned his J.D./M.B.A. from the University of San Diego in 2011, and his B.A. in Global Business, with a minor in Advertising, from the University of Southern California in 2007. He is admitted to practice in California.

Upon graduation from law school, Mr. Stephan worked with Perkins Coie LLP in strategic management, creating comprehensive plans to generate growth and business development. He went on to work with The Mogin Law Firm, P.C., as part of a team of antitrust experts working on complex litigation, including multi-district litigation and suits in both state and federal court. Mr. Stephan worked directly with economic experts, led litigation task teams, and was directly responsible for managing a discovery system to facilitate the firm's work. Mr. Stephan has also worked with Scott + Scott, Attorneys at Law, LLP, in litigation support for antitrust and securities litigation. Finally, Mr. Stephan has worked and continues to work with entrepreneurs, specializing

in corporate transactions and start-up law, including capital acquisition, strategic management, intellectual property, and contract drafting and management.

On December 7, 2015, Mr. Stephan joined Krause, Kalfayan, Benink & Slavens as an Associate Attorney. Mr. Stephan's practice focuses on antitrust actions and complex business litigation. Some of his cases involve antitrust violations by corporate defendants, including "reverse payment" or "pay to delay" settlement agreements between brand name pharmaceutical drug manufacturers and generic drug manufacturers. Mr. Stephan is able to utilize his experience litigating complex antitrust cases and working with businesses to better serve his clients.

Mr. Stephan is active in the legal community. Since 2014, Mr. Stephan has served on the Advisory Board of the Business + Corporate Section of the San Diego County Bar Association, and is serving as the Vice Chair of the Section for 2017-2018, helping to design continuing legal education, plan events, and serve as a liaison between section members and the SDCBA. Mr. Stephan has also been a member of the William L. Todd Jr. American Inn of Court since 2014. Mr. Stephan practices *pro bono* on behalf of Yorkie Rescue of America.

SARAH B. ABSHEAR

Sarah B. Abshear received her juris doctorate from Columbia Law School in 2009, where she was a Harlan Fiske Stone Scholar, an academic honor awarded in recognition of superior performance. In 2006, Ms. Abshear graduated *summa cum laude* from the University of Kentucky with a Bachelor of Arts degree in Political Science and a minor in History. Ms. Abshear was admitted to the state bars of California and New York in 2010. Ms. Abshear is also admitted to practice before the United States Court of Appeals for the Ninth Circuit; the United States District Courts for the Southern, Central, and Northern Districts of California; and the United States District Courts for the Southern and Eastern Districts of New York.

From 2009-2012, Ms. Abshear worked as an attorney for Dewey & LeBoeuf, LLP, after clerking for the firm as a summer associate in 2008. For the first two years of her tenure at Dewey, Ms. Abshear participated in the firm's fellowship program, acting as a staff attorney for the American Civil Liberties Union of San Diego & Imperial Counties. At the ACLU, Ms. Abshear's practice consisted of civil rights litigation and advocacy, with a focus on the First Amendment.

Ms. Abshear returned to the New York office of Dewey & LeBoeuf in 2011 as a litigation associate. In 2012, she was one of approximately 60 litigators to leave Dewey and join the litigation department of the New York office of Winston & Strawn, LLP. Ms. Abshear's work at Dewey & LeBoeuf and Winston & Strawn focused on complex commercial litigation and antitrust cases, including class actions, sports litigation, insurance and reinsurance contract disputes between sophisticated parties, and internal and government investigations.

Ms. Abshear joined the Mogin Law Firm in 2014, where her practice focused on complex business litigation and class actions, including antitrust, unfair competition, and consumer protection cases. She subsequently went to work for Buchanan, Ingersoll, & Rooney, LLP, where her practice focused on general civil litigation, including business disputes, contract law, water rights, trade secrets, and employment law.

Ms. Abshear joined Krause, Kalfayan, Benink & Slavens as an associate attorney in February 2017. Her practice focuses on complex commercial litigation, class actions, and antitrust. Ms. Abshear has experience with a broad range of litigation across multiple industries, in both federal and state courts. She has handled all stages of case development, from initial claim assessment to post-trial motions and appeals. Ms. Abshear's clients have included Fortune 500 companies, small businesses, classes of plaintiffs, individual plaintiffs and defendants, and government entities. Representative cases include:

- *Kleen Products, LLC v. International Paper, Inc.* (N.D. Ill.) – Represented Plaintiff Class of direct purchasers in suit brought against price-fixing cartel of containerboard producers.
- *Roos v. Honeywell, International, Inc.* (Cal.) – Represented Respondent Class Plaintiffs in appeal of class action settlement by Appellant Objectors.
- Defended corporation and subsidiaries in multidistrict and related putative class actions involving alleged violations of antitrust and consumer protection statutes. Also represented corporation and subsidiaries in relation to investigation and settlement with the United States Department of Justice.
- *7 West 57th Street Realty Company, LLC v. CitiGroup, Inc.* (S.D.N.Y.) – Represented Plaintiff 7 West 57th Street Realty Company in suit brought against Defendant banks for manipulation of U.S. Dollar LIBOR.
- *Saubers v. Kashi Company* (S.D. Cal.) – Represented Plaintiff Class of purchasers in suit brought against Defendant Kashi for misleading consumers with deceptive labelling.
- *Glick v. Bankers Life & Casualty Insurance Company* – Defended insurance company in putative class action regarding allegedly delayed/denied premium payments and "modal premium" claims, the latter of which were summarily rejected on a motion to dismiss.
- *Aqua Clear Water Treatment v. Senior Operations* (Cal.) – Represented aerospace company in breach of contract case brought by its water treatment servicer for nonpayment of contract, including filing cross-complaint regarding breach of contract and fraud to ultimately resolve case with joint dismissal of claims.
- *Stemage Skin Care, LLC v. NuGene International, Inc. et al.* (C.D. Cal.) – Represented skin care company in case alleging competing company interfered with contract of brand ambassador and infringed copyright.
- *NDO America, Inc. v. Ozburn-Hessey Logistics, LLC, et al.* (Cal.) – Represented company in suit alleging theft of trade secrets and solicitation of personnel in violation of non-compete clause.
- *City of Carlsbad and Carlsbad Municipal Water District v. California State Water and Resources Control Board* (Cal.) – Represented City of Carlsbad in action to establish its water rights and SWRCB's lack of authority to regulate water at issue.

Ms. Abshear is involved in the local community. She is a member of the San Diego Leadership Alliance (SDLA) and a SDLA 2016 Leadership Institute Fellow, where she participated in training in civic engagement, public speaking, fundraising, communications, public policy, campaigns, and organizing. She is a member of the Lawyers Club of San Diego, where she participates on the Annual Dinner Committee, helps plan events, and writes articles for the

monthly newsletter. She is also a member of the San Diego County Bar Association and Federal Bar Association.

EXHIBIT B

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

Firm Name: Krause, Kalfayan, Benink & Slavens, LLP **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Ralph B. Kalfayan (P)			12.00		31.40						15.30				58.70	$625.00	$36,687.50
Lynne Brennan (A)	0.20										0.50				0.70	$500.00	$350.00
Phillip Stephan (A)			3.10		43.90	3.30					13.80				64.10	$375.00	$24,037.50
Amanda Friedman (A)											1.00				1.00	$300.00	$300.00
SUB-TOTAL	**0.20**	**0.00**	**15.10**	**0.00**	**75.30**	**3.30**	**0.00**	**0.00**	**0.00**	**0.00**	**30.60**	**0.00**	**0.00**	**0.00**	**124.50**		**$61,375.00**
NON-ATTORNEYS																	
Ian Krupar (LC)															0.00	$0.00	$0.00
Ian Krupar (LC)											1.00				1.00	$225.00	$225.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.00**	**1.00**		**$225.00**
GRAND TOTAL:	**0.20**	**0.00**	**15.10**	**0.00**	**75.30**	**3.30**	**0.00**	**0.00**	**0.00**	**0.00**	**31.60**	**0.00**	**0.00**	**0.00**	**125.50**		**$61,600.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Krause Kalfayan Benink & Slavens, LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Ralph B. Kalfayan	Inception – January 1, 2016	$500.00
Ralph B. Kalfayan	January 1, 2016 – January 1, 2017	$600.00
Ralph B. Kalfayan	January 1, 2017 - Present	$625.00
Phillip Stephan	December 7, 2015 – January 1, 2017	$350.00
Phillip Stephan	January 1, 2017 - Present	$375.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Ian Krupar	January 1, 2016 - January 1, 2017	$200
Ian Krupar	January 1, 2017 - Present	$225

EXHIBIT D

(REDACTED)

□rause, □al□ayan, □enink □ □lavens □□P
550 West C Street, Suite 530
San Diego, California, 92101

Invoice submitted to:
Lithium-Ion Antitrust
Cotchett, Pitre & McCarthy, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010

May 23, 2017

In Reference To: Lithium-Ion Antitrust

Professional Services

			□rs/Rate	Amount
6/28/2013	RBK	Litigation Strategy (11) [redacted], and suggestions/edit.	0.30 500.00/hr	150.00
3/3/2014	AF	Case Management (11) [redacted]	0.20 300.00/hr	60.00
3/17/2014	RBK	Case Management (11) Analysis of motion to dismiss issues (1). Analysis and suggested revisions of [redacted] (.5).	1.50 500.00/hr	750.00
4/21/2014	AF	Case Management (11) Draft e-mail to Eric Fastiff re: motion to dismiss.	0.20 300.00/hr	60.00
7/14/2014	AF	Case Management (11) [redacted]	0.60 300.00/hr	180.00
10/1/2014	LB	Case Management (11) [redacted]	0.20 500.00/hr	100.00
10/3/2014	LB	Case Management (1) Analysis of [redacted] documents regarding his purchases of products w/ lithium ion batteries	0.20 500.00/hr	100.00

			Hrs/Rate	Amount
10/3/2014	LB	General (11) Update [redacted] (.2); respond to follow up question from lead counsel (.1).	0.30 500.00/hr	150.00
1/8/2015	RBK	Case Management (11) Correspondence [redacted] and with lead counsel.	0.50 500.00/hr	250.00
2/18/2015	RBK	Case Management (11) Correspondence with [redacted]	0.50 500.00/hr	250.00
5/1/2015	RBK	Discovery (3) Conferences with [redacted] (.5); draft of responses to discovery (.5).	1.00 500.00/hr	500.00
5/4/2015	RBK	Case Management (11) [redacted] (.7), and teleconferences with lead counsel re: discovery responses (.3).	1.00 500.00/hr	500.00
5/5/2015	RBK	Discovery (3) Correspondence w/lead counsel re: discovery and client availability.	0.20 500.00/hr	100.00
5/6/2015	RBK	Discovery (3) Preparation of and edits to discovery responses for [redacted] (2); [redacted] and lead counsel (1).	3.00 500.00/hr	1,500.00
5/7/2015	RBK	Discovery (3) Further preparation and edits to discovery responses for [redacted] (2.8); [redacted] (.3); Correspondence with lead counsel (.2).	3.30 500.00/hr	1,650.00
5/8/2015	RBK	Discovery (3) Further edits to discover responses for [redacted] (1.7); [redacted] (.2); Correspondence with lead counsel (.1).	2.00 500.00/hr	1,000.00
12/2/2015	RBK	Deposition (5) Teleconference w/Sklaver re: deposition of [redacted] (.5) and teleconference with IK re: deposition preparation (.5).	1.00 500.00/hr	500.00

			Hrs/Rate	Amount
12/2/2015	IK	Case Management (11) Call with Co-Counsel with RBK to discuss next steps of case and what should be done coming up.	1.00 200.00/hr	200.00
1/4/2016	PS	Discovery (5) Analysis of deposition of [redacted] (2.3). Meeting w/RBK re: deposition preparation (.5). Correspondence and teleconference with Bugge (.5).	3.80 350.00/hr	1,330.00
1/7/2016	PS	Discovery (3) Correspondence with [redacted] and lead counsel re: discovery.	0.30 350.00/hr	105.00
1/15/2016	PS	Deposition (5) Preparation for deposition via case analysis and outlining (1). Correspondence with client and co-counsel re: deposition preparation (.5)	1.50 350.00/hr	525.00
1/27/2016	PS	Deposition (3) [redacted] (.2); correspondence with co-counsel regarding same (.1)	0.30 350.00/hr	105.00
	RBK	Discovery (3) Deposition prep with PS re: discovery responses and outlines.	2.50 600.00/hr	1,500.00
2/8/2016	PS	Case Management (11) Correspondence with co-counsel and client (.3). Meeting with RBK re: deposition prep and schedule (.2).	0.50 350.00/hr	175.00
2/25/2016	RBK	Deposition (5) Analysis of [redacted] documents, discovery responses, complaints, and other case documents in preparation for deposition (3.5). [redacted] (.5). Correspondence with co-counsel (.4).	5.40 600.00/hr	3,240.00
	PS	Case Management (11) Case management of materials (discovery responses, complaints, orders, etc) in preparation for deposition.	0.70 350.00/hr	245.00
	PS	Deposition (5) [redacted] (.1); Correspondence with co-counsel regarding deposition of client (.1); Meeting with RBK re: deposition prep (.3).	0.50 350.00/hr	175.00

			rs/Rate	Amount
2/26/2016	PS	Deposition (5) Analysis of 3rd and 4th CACs for use in deposition prep (3); Analysis of [redacted] discovery responses in depo prep (2); [redacted] (.5).	5.50 350.00/hr	1,925.00
2/29/2016	PS	Deposition (5) Analysis of prior deposition transcripts (3.5); analysis of [redacted] discovery responses versus depositions (.2).	3.70 350.00/hr	1,295.00
3/1/2016	PS	Deposition (5) Analysis of prior IPP depositions (3); analysis of 4th CAC versus 3rd CAC (1);Analysis of orders Construction of deposition prep outline (1). Initial client meeting and preparation (3.2).	8.20 350.00/hr	2,870.00
	RBK	Deposition (5) Preparation of client for deposition.	8.00 600.00/hr	4,800.00
3/2/2016	PS	Deposition (5) Preparation of materials for [redacted] and co-counsel review (3). Deposition preparation of [redacted] including [redacted] (6.7).	9.70 350.00/hr	3,395.00
	RBK	Deposition (5) [redacted] (6.7). Teleconference with lead counsel (.3); Analysis of 3rd party transcripts (1).	8.00 600.00/hr	4,800.00
3/3/2016	RBK	Deposition (5) Appearance at deposition of [redacted] (8). Pre and post deposition meetings with [redacted] (.8). Teleconference with co-counsel (.2).	9.00 600.00/hr	5,400.00
	PS	Deposition (5) Attend deposition of [redacted] (8). [redacted] (1).	9.00 350.00/hr	3,150.00
3/11/2016	PS	Case Management (11) Analysis of discovery of [redacted] (.2).	0.50 350.00/hr	175.00
	RBK	Case Management (11) Correspondence regarding modifications to class rep discovery (3); Analysis of discovery of [redacted] (.5).	3.50 600.00/hr	2,100.00

			rs/Rate	Amount
3/14/2016	RBK	Case Management (11) Correspondence with co-counsel regarding amended complaint (.5). Analysis of order on motion to amend (.5).	1.00 600.00/hr	600.00
	PS	Discovery (3) Analysis of required modifications for discovery responses (.7). Teleconference with co-counsel re: explanation of discovery modifications and review to client (.3); [redacted] (.5).	1.50 350.00/hr	525.00
3/17/2016	PS	Deposition (5) Analysis of [redacted] deposition transcript (1.5). Meeting w/RBK re: suggested errata and next steps (.5).	2.00 350.00/hr	700.00
3/18/2016	RBK	Case Management (11) E-mail from co-counsel regarding settlement (.4). Analysis of settlement (2.5). Communication with [redacted] regarding settlement(.6).	3.50 600.00/hr	2,100.00
3/21/2016	PS	Discovery (6) [redacted]	0.50 350.00/hr	175.00
3/30/2016	PS	Case Management (11) Phone call with [redacted] and upcoming steps in case (.5). Correspondence with co-counsel (.2). Meeting w/RBK re client call and settlement (.3)	1.00 [redacted]	350.00
3/31/2016	PS	Discovery (6) [redacted]	0.30 350.00/hr	105.00
	RBK	Case Management (11) Analysis of correspondence regarding settlement and client correspondence (2). Meeting w/PS re: discovery issues and protocol (.5).	2.50 600.00/hr	1,500.00
4/1/2016	PS	Discovery (6) [redacted]	0.50 350.00/hr	175.00

			Hrs/Rate	Amount
4/4/2016	RBK	Case Management (11) Meeting w/PS re: production and Bugge's ESI request and search.	1.00 600.00/hr	600.00
	PS	Discovery (6) Preparation for and attendance during phone call with lead counsel, document vendor, and client, regarding document searches.	2.00 350.00/hr	700.00
4/7/2016	PS	Case Management (11) [redacted] (.3) and analysis of transcript for errata (.5).	0.80 350.00/hr	280.00
4/12/2016	PS	Case Management (11) [redacted]	0.70 350.00/hr	245.00
4/20/2016	PS	Case Management (11) Analysis and document review regarding: [redacted] production (.5). [redacted] (.3).	0.80 350.00/hr	280.00
4/21/2016	PS	Discovery (3) [redacted] (.8). Analysis of discovery orders versus Bugge production (.2).	1.00 350.00/hr	350.00
11/8/2016	PS	Case Management (11) [redacted] 3). [redacted] (.2).	0.50 350.00/hr	175.00
11/23/2016	PS	Case Management (11) [redacted] (1.8). [redacted] (1). [redacted] (.2).	3.00 350.00/hr	1,050.00
12/19/2016	PS	Case Management (11) [redacted] (.5). [redacted] (.2). [redacted] (.5).	1.20 350.00/hr	420.00
1/4/2017	PS	Case Management (11) [redacted] (1). [redacted] (.5). [redacted] (.5).	2.00 375.00/hr	750.00

			Hrs/Rate	Amount
1/5/2017	PS	Case Management (11) Analysis of statement of recent decision regarding: class certification requirements (.3). Meeting with RBK re statement of recent decision and impact on [redacted] (.2).	0.50 375.00/hr	187.50
1/23/2017	PS	Case Management (11) Analysis of motion to dismiss Flextronics USA's amended complaint (.5). Calendaring and case management (.3).	0.80 375.00/hr	300.00
1/30/2017	PS	Case Management (11) Analysis of motion for preliminary approval documents (.5). [redacted] (.3).	0.80 375.00/hr	300.00
		For professional services rendered	**12.0**	**$7,177.00**
		For professional services rendered	**12.0**	**$7,177.00**

EXHIBIT E

NAME: Krause Kalfayan Benink & Slavens MONTH: June 1, 2013-February 28, 2017

IN RE: LITHIUM ION BATTERIES INDIRECT
MONTHLY COSTS REPORT

CATEGORY	DESCRIPTION (If necessary)	PRIOR COSTS	CURRENT COSTS	CUMULATIVE COSTS
Litigation Assessment				$0.00
Court Costs				$0.00
Experts/consultants				$0.00
Federal Express				$0.00
Hearing Transcripts		$255.00		$255.00
Investigation				$0.00
Lexis/westlaw				$0.00
Messenger/delivery				$0.00
Photocopies - in House		$25.40		$25.40
Photocopies - Outside				$0.00
Postage		$0.48		$0.48
Service of Process				$0.00
Special Supplies				$0.00
Telephone/telecopier				$0.00
Travel		$1,390.51		$1,390.51
Miscellaneous		$443.90		$443.90
TOTAL		$2,115.29	$0.00	$2,115.29

EXHIBIT 38

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF CASEY L. LOTT IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LANGSTON & LOTT**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Casey L. Lott, declare:

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

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

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

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

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

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

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

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

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

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

Executed on May 23, 2017 at Booneville, Mississippi.

/s/ Casey L. Lott

Casey L. Lott

ATTESTATION

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

By: */s/ Steven N. Williams*
Steven N. Williams

EXHIBIT A

EXHIBIT A

CIRRICULUM VITAE

CASEY L. LOTT, ESQ.

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

Telephone: (662) 728-9733
Facsimile: (662) 728-1992

Email: clott@langstonlott.com

Website: www.langstonlott.com

EXPERTISE:

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

PROFESSIONAL SUMMARY

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

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

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

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

Following the *Deepwater Horizon* disaster in April, 2010, Langston & Lott partnered with Faegre Baker Daniels in Minneapolis, Minnesota[1] to represent commercial fishermen who suffered economic damage from the oil spill. This team opened offices in Bayou La Batre, Alabama; Biloxi, Mississippi and New Orleans, Louisiana dedicated solely to prosecuting claims for commercial fishermen. Langston & Lott presently represents approximately 2,000 commercial seafood clients. This client base represents approximately one-third of the federally permitted (EEZ) fishermen in Gulf Coast Area (as defined by the settlement) and close to 60% of commercial shrimpers and oystermen in Mississippi. Other than members of the PSC, the Langston & Lott team of attorneys was the only group of plaintiff attorneys asked by Judge Barbier to speak in support of the settlement at the Fairness Hearing.

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

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

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

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

HONORS

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

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

EDUCATION

Mississippi State University
BA, Business Administration
Cum Laude, 2002

University of Mississippi School of Law
Juris Doctorate, 2004

AWARDS/ACHIEVEMENTS

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

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

PROFESSIONAL ASSOCIATIONS/ACTIVITIES

Member of the Bar in Mississippi and Alabama

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

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

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

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

Member American Association for Justice

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

City Attorney, Marietta, Mississippi, 2008-present

Member of Booneville Area Chamber of Commerce

Member of the Prentiss County Development Association

COMMUNITY ACTIVITIES

Joe Ray Langston Memorial Scholarships, Northeast Mississippi Community College

Cynthia Anne Langston Memorial Scholarships, Northeast Mississippi Community College

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

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

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

EXHIBIT B

EXHIBIT B

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

Langston & Lott

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

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

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EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

LANGSTON & LOTT

ATTORNEYS	DATE RANGE	HOURLY RATE
Casey L. Lott	6/29/2013 – 10/22/2014	$550.00
Casey L. Lott	3/20/2015 – 5/26/2015	$600.00
Casey L. Lott	2/4/2016 – 4/12/2016	$700.00
–		

NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

(REDACTED)

EXHIBIT D

DETAILED TIME

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION
LANGSTON & LOTT

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

EXHIBIT 39

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF GEORGE RIKOS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LAW OFFICES OF GEORGE RIKOS**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, George Rikos declare:

1. I am the principal of the Law Offices of George Rikos, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Bradley Van Patten and as counsel for IPPs throughout the course of this litigation. The background and experience of Law Offices of George Rikos and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Law Offices of George Rikos performed the following work: Preparing of client for deposition, meeting with client in preparation of further document production; participation in remote collection of search for potential responsive documents; analysis of proposed responses to third set of interrogatories; meet with client to discuss responses to third set of interrogatories, analysis of settlement agreements and approval of same.

5. Attached hereto as **Exhibit B** is a billing summary of Law Offices of George Rikos' total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Law Offices of George Rikos during this period of time was 8.5, with a corresponding lodestar based on current rates of $2,762.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my

law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Law Offices of George Rikos

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Law Offices of George Rikos has incurred during the course of this litigation. Law Offices of George Rikos expended a total of $400 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Law Offices of George Rikos on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Law Offices of George Rikos in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 26, 2017 at San Diego, California.

/s/ George Rikos

George Rikos

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Exhibit A

I have been a licensed attorney in the State of California for approximately 18 years. My practice has primarily focused on litigation. During the course of my 18 years of practice I have been certified lead counsel in a class action lawsuit.

EXHIBIT B

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

Firm Name: Law Offices of George Rikos

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
George Rikos			2.60		4.50		1.40								8.50	$325.00	$2,762.50
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**2.60**	**0.00**	**4.50**	**0.00**	**1.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**8.50**		**$2,762.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**2.60**	**0.00**	**4.50**	**0.00**	**1.40**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**8.50**		**$2,762.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

LAW OFFICES OF GEORGE RIKOS

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
George Rikos	2013-2017	$325
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

Law Offices of George Rikos

225 Broadway Suite 2100

San Diego, CA 92101

Phone: (858) 342-9161 | Fax: (858) 724-1453

Account Statement

Prepared for Brad Van Patten

Re: Van Patten v. Panasonic

Previous Invoice Amount	$0.00
Last Payment Received	$0.00
Previous Balance	$0.00
Current Charges	$3,162.50
Total Due	$3,162.50

Law Offices of George Rikos

225 Broadway Suite 2100
San Diego, CA 92101
Phone: (858) 342-9161 | Fax: (858) 724-1453

Brad Van Patten

Invoice Date: May 26, 2017
Invoice Number: 10176
Invoice Amount: $3,162.50

Matter: Van Patten v. Panasonic

Attorney's Fees

2/2/2016	Prepare [redacted] for deposition	G.R.	4.50	$1,462.50
4/13/2016	Meeting with [redacted] in preparation of further document production (.8): [redacted]	G.R.	1.90	$617.50
4/25/2016	Receipt and analysis of proposed response to third set of interrogatories (.1); [redacted]	G.R.	.40	$130.00
5/23/2016	Telephone conference with [redacted]	G.R.	.30	$97.50
1/10/2017	Review and analysis of [redacted]	G.R.	.90	$292.50
1/16/2017	Review and analysis of [redacted]	G.R.	.40	$130.00
1/18/2017	Prepare email to co-lead counsel Ben Siegal [redacted].	G.R.	.10	$32.50
SUBTOTAL:			8.50	$2,762.50

Costs

4/28/2017	Original Filing Fee (October 2012) with Southern District of California	$400.00
SUBTOTAL:		$400.00

TOTAL: $3,162.50
PREVIOUS BALANCE DUE: $0.00
CURRENT BALANCE DUE AND OWING: $3,162.50

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
LAW OFFICES OF GEORGE RIKOS
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	$400
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	$400

EXHIBIT 40

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF WILLIAM STRAUS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LAW OFFICES OF WILLIAM STRAUS**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, WILLIAM STRAUS, declare:

1. I am William Straus of the Law Offices of William Straus, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to William Cabral and as counsel for IPPs throughout the course of this litigation. The background and experience of William Straus and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Law Offices of William Straus performed the following work: Legal research with regard to indirect purchaser claims, client consultation, drafting of pleadings including Complaint and Discovery documents, exhibit review, defending deposition, communication with co-counsel as required.

5. Attached hereto as **Exhibit B** is a billing summary of Law Office of William Straus's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Law Offices of William Straus. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Law Office of William Straus and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of William Straus in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Law Office of William Straus and filed on

May 26, 2017. (ECF No. 1813-26). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Law Office of William Straus since June 1, 2013 was 37.9 hours, with a corresponding lodestar of $9,832.00 based on current rates.

8. I have reviewed the time reported by Law Office of William Straus in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Boca Raton, Florida.

/s/ William Straus

William Straus

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

Exhibit A

William M. Straus

Curriculum Vitae

William M. Straus is the sole practicing attorney in the Law Offices of William M. Straus located in New Bedford, Massachusetts.

Address: 15 Hamilton Street
New Bedford, MA 02740
508-992-1260
508-332-5121 (facsimile)

rep.straus@verizon.net

Professional Summary

Mr. Straus has been engaged in the active practice of law since December 1982 with extensive civil and criminal litigation experience. From 1982 to 1988 he was an Assistant District Attorney in the office of the Bristol County Massachusetts District Attorney representing the Commonwealth in scores of Bench and Jury trials and before the Grand Jury.

His civil practice has included matters in the District, Superior, Probate, Appeals and Supreme Judicial courts of the Commonwealth and the Federal District Court of Massachusetts. He is a member of the bar in Massachusetts and Virginia. His practice includes trial level and appellate work, having argued several cases on appeal before the Massachusetts Appeals Court

and the Massachusetts Supreme Judicial Court. His civil practice has included over two hundred administrative agency proceedings and arbitrations on behalf of clients.

His civil work has also included participation as Plaintiff's counsel in prior class action litigation involving indirect purchasers including *In Re Vitamin C Litigation,* 1:06-MD-01738 (BMC) (JO), Eastern District of New York; and *In Re Static Random Access Memory (SRAM) Antitrust Litigation,* MDL No 1819.

Education

Middlebury College
Middlebury Vermont
BA, 1978 *cum laude*

Georgetown University
Washington, D.C.
JD, 1982

Harvard University
Cambridge, MA
MPA, 2007

EXHIBIT B

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

Law Office of William Straus **Reporting Period: March 1, 2017 through April 1, 2019**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
William Straus (P)						0.70	0.90								1.60	$265.00	$424.00
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.70**	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.60**		**$424.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.70**	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.60**		**$424.00**

EXHIBIT C

LAW OFFICE

WILLIAM M. STRAUS

15 HAMILTON STREET

NEW BEDFORD, MASSACHUSETTS 02740

TELEPHONE (508) 992-1260
FAX: (508) 332-5121
Rep.straus@verizon.net

ADMITTED TO PRACTICE:
MASSACHUSETTS
VIRGINIA

April 5, 2019

Jennie Anderson
Andrus Anderson LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104

Sent by email only

Re: *Lithium Ion Batteries Antitrust Litigation*
No. 13-MD-02420 YGR (DMR) – Time and Expense Submission

The within time records are submitted based upon my work as local counsel for Massachusetts Plaintiff William Cabral in these proceedings. I have reviewed the Notices regarding the submissions requested for the time period March 1, 2017 to the present and am aware of the requirements as provided.

Billing rates below reflect my rate for this type of work during the periods identified.

Dated	Cat#	Purpose	
5/24/17	7	Review correspondence and pleadings from Counsel re [redacted]	.3
5/24/17	6	Confer with client Cabral re [redacted]	.2
6/25/18	7	Review [redacted] from Hagens Berman	.4
6/25/18	6	Confer with client re [redacted]	.3
7/23/18	7	Review [redacted] prepared by Cotchett, Pitre	.2
7/23/18	6	Confer w/client and prepare response to class counsel	.2

	Total at $265 hours	**1.6**

Summary:

1.5 @ $265	**$424.00**

Several co-counsel cc'd at times.

EXHIBIT 41

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF WILLIAM M. STRAUS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF THE LAW OFFICE OF WILLIAM M. STRAUS**

I, William M. Straus, declare:

1. I am partner in the Law Offices of William M. Straus, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to William Cabral and as counsel for IPPs throughout the course of this litigation. The background and experience of the Law Offices of William M. Straus and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. The Law Offices of William M. Straus has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While the Law Offices of William M. Straus devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, the Law Offices of William M. Straus performed the following work: Legal research with regard to indirect purchaser claims, client consultation, drafting of pleadings including Complaint and Discovery documents, exhibit review, defending deposition, confer with co-counsel as required by case progress.

5. Attached hereto as **Exhibit B** is a billing summary of the Law Offices of William M. Straus total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by the Law Offices of William M. Straus during this period of time was 36.30, with a corresponding lodestar based on current rates of $9,408.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional

staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by the Law Offices of William M. Straus.

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

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

8. The Law Offices of William M. Straus is not seeking reimbursement for expenses in this Declaration.

9. I have reviewed the time and expenses reported by the Law Offices of William M. Straus in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 25, 2017 at New Bedford, Massachusetts.

/s/ William M. Straus

William M.. Straus

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Exhibit A

William M. Straus

Curriculum Vitae

William M. Straus is the sole practicing attorney in the Law Offices of William M. Straus located in New Bedford, Massachusetts.

Address: 15 Hamilton Street
New Bedford, MA 02740
508-992-1260
508-332-5121 (facsimile)

rep.straus@verizon.net

Professional Summary

Mr. Straus has been engaged in the active practice of law since December 1982 with extensive civil and criminal litigation experience. From 1982 to 1988 he was an Assistant District Attorney in the office of the Bristol County Massachusetts District Attorney representing the Commonwealth in scores of Bench and Jury trials and before the Grand Jury.

His civil practice has included matters in the District, Superior and Probate courts of the Commonwealth and the Federal District Court of Massachusetts. He is a member of the bar in Massachusetts and Virginia. His practice includes trial level and appellate work, having argued several cases on appeal before the Massachusetts Appeals Court and the Massachusetts

Supreme Judicial Court. His civil practice has included over a hundred administrative agency proceedings and arbitrations on behalf of clients.

His civil work has also included participation as Plaintiff's counsel in prior class action litigation involving indirect purchasers including *In Re Vitamin C Litigation,* 1:06-MD-01738 (BMC) (JO), Eastern District of New York; and *In Re Static Random Access Memory (SRAM) Antitrust Litigation,* MDL No 1819.

Education

Middlebury College
Middlebury Vermont
BA, 1978 *cum laude*

Georgetown University
Washington, D.C.
JD, 1982

Harvard University
Cambridge, MA
MPA, 2007

EXHIBIT B

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

Law Offices of William M. Straus

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
William M. Straus 2013-15			9.20		0.70		4.20								14.10	$250.00	$3,525.00
William M. Straus 2016-17			3.80		14.40		0.30					3.70			22.20	$265.00	$5,883.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**13.00**	**0.00**	**15.10**	**0.00**	**4.50**	**0.00**	**0.00**	**0.00**	**0.00**	**3.70**	**0.00**	**0.00**	**36.30**		**$9,408.00**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**13.00**	**0.00**	**15.10**	**0.00**	**4.50**	**0.00**	**0.00**	**0.00**	**0.00**	**3.70**	**0.00**	**0.00**	**36.30**		**$9,408.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

LAW OFFICES OF WILLIAMS STRAUS

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
William M. Straus	2013-2015	$250
William M. Straus	2016-Present	$265

NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

LAW OFFICE

WILLIAM M. STRAUS

15 HAMILTON STREET

NEW BEDFORD, MASSACHUSETTS 02740

TELEPHONE (508) 992-1260
FAX: (508) 332-5121
Rep.straus@verizon.net

ADMITTED TO PRACTICE:
MASSACHUSETTS
VIRGINIA

May 14, 2017

Jennie Anderson
Andrus Anderson LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104

Sent by email only

Re: *Lithium Ion Batteries Antitrust Litigation*
No. 13-MD-02420 YGR (DMR) – Time and Expense Submission

The within time records are submitted based upon my work as local counsel for Massachusetts Plaintiff William Cabral in these proceedings. I have reviewed the Notices regarding the submissions requested for the time period June 1, 2013 through February 28, 2017 and am aware of the requirements as provided. I was not, however, included on the Service List from Lead Counsel for those notices and was only notified within the last few days.

Billing rates below reflect my rate for this type of work during the periods identified.

Dated	Cat#	Purpose	
6/28/13	7	Review correspondence from Counsel re Protective Order	.2
6/30/13	7	Review of Protective Order,	.8
6/30/13	7	Review Draft Complaint	1.3
7/1/13	7	[redacted]	1.1
7/2/13	7	[redacted]	.1
9/28/14	7	Doc prep and review of Preservation Declaration	.4

9/28/14	7	Correspondence w/ [redacted]	.2
4/23/15	7	Correspondence from counsel re Discovery	.1
4/27/15	3	Correspondence with counsel re Discovery Document Requests and Interrogatories	.3
5/5/15	3	Conference call w/co-counsel & [redacted]	.3
5/5/15	3	Conference call w/ [redacted] and counsel	.5
5/11/15	3	Review correspondence from Counsel re Interr. Response	.2
5/11/15	3	Correspondence with [redacted]	.1
6/10/15	3	Review correspondence from Counsel re photo Discovery request	.2
6/16/15	3	Mtg. [redacted]	.4
9/14/15	3	Correspondence with counsel re Discovery	.3
9/16/15	3	Correspondence with counsel re Discovery	.2
9/21/15	3	Correspondence with counsel re Discovery	.1
9/22/15	3	Review correspondence from counsel	.6
9/25/15	3	Review Interr. Responses and conf call w/ [redacted]	2.7
11/5/15	3	Review of Suppl. Discovery Responses w/ [redacted]	2.2
11/12/15	3	Correspondence with counsel re Supplementary Response Verif.	.2
11/13/15	3	Prep of Discovery materials and transmit to counsel	.9
12/3/15	5	Scheduling Correspondence for depo.	.2
12/7/15	5	Scheduling correspondence with counsel re [redacted] deposition	.1
12/8/15	5	Scheduling correspondence with counsel re [redacted] deposition	.1
12/11/15	5	Scheduling correspondence with counsel re [redacted] deposition	.2
12/14/15	5	Scheduling correspondence with counsel re [redacted] deposition	.1

Total at $250.00 hourly **14.1**

Date	Cat#	Purpose	
1/4/16	5	Correspondence w/counsel & [redacted]	.5
1/5/16	5	Correspondence w/counsel and [redacted]	.4
1/7/16	5	Correspondence w/counsel re depo prep session	.2
1/8/16	5	Correspondence w/counsel and review of depos materials	.6
1/11/16	5	Correspondence w/counsel re scheduling depos prep	.2
1/12/16	5	Depo phone prep conference call and pre-call with [redacted]	2.6
1/13/16	5	Depo prep mtg. with counsel and [redacted] in Boston	2.4
1/14/16	5	Attendance at Deposition of [redacted] and prep	7.5
3/14/16	3	Correspondence with counsel re Discovery responses	.2
3/14/16	3	Case review with [redacted]	.4
3/19/16	12	Review settlement terms with Sony and correspondence [redacted]	.8
3/20/16	3	Telephone call with [redacted] re: Discovery parameters	.4
3/20/16	3	Correspondence w/counsel re Discovery	.2
3/24/16	3	Correspondence to counsel re Discovery conference call	.2
3/28/16	3	Preparation for Discovery conference call	.6
3/29/16	3	Participation in Discovery conference call	1.3
3/31/16	3	Telephone call with [redacted]	.3
4/11/16	3	Correspondence with counsel re: [redacted]	.2
7/13/16	7	Correspondence w/C. Voight re Class Notice	.3
11/22/16	12	[redacted]	1.2

11/22/16	12	[redacted]	.5
12/16/16	12	[redacted]	1.2

Total at $265 hours **22.2**

Summary:	**14.1 hours @ $250**	**$3,525.00**
	22.2 hours @ $265	**$5,883.00**
	Total Submitted	**$9,408.00**

Co-Counsel involved: Carla Voight, Tim Batin, Demetrius Lambrinos, Krysta Kauble Pachman. Several other co-counsel cc'd at times.

EXHIBIT 42

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF ERIC S. SOMERS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LEXINGTON LAW GROUP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Eric S. Somers, declare:

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

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

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

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

5. Attached hereto as **Exhibit B** is a billing summary of Lexington Law Group's total hours and lodestar, computed at current billing rates, from March 1, 2017 to February 28, 2019. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Lexington Law Group. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates. Lexington Law Group's rates remained the same from November 2012 to December 2018, then increased as of January 1, 2019. The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Lexington Law Group and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Eric S. Somers in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Lexington Law Group and filed on May 26, 2017. (ECF No. 1813-27). As noted above, the billing rates of certain Lexington Law Group attorneys who performed work during that time have increased since the previous submission. Specifically, Eric Somers now bills at $850 an hour, Mark Todzo at $800 an hour, Joe Mann at $650 an hour, and Lisa Burger at $550 an hour.

7. In summary, the total number of hours spent by Lexington Law Group between June 1, 2013 and February 28, 2019 was 122.9, with a corresponding lodestar based on current rates (for March 1, 2017 to February 28, 2019) and then-current rates (for June 1, 2013 to February 28, 2017) of $75,824.

8. Attached hereto as **Exhibit D** is a summary of the expenses Lexington Law Group has incurred from June 1, 2013 to February 28, 2019, plus applicable case filing fees. Lexington Law Group has expended a total of $632.20 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Lexington Law Group on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense vouchers, receipts, and confirmatory correspondence, and thus represent an accurate recordation of the expenses incurred. A compilation of these

transactional records is attached hereto in **Exhibit E**. These transactional records have been redacted to remove sensitive personal and financial information. I have reviewed the time and expenses reported by Lexington Law Group in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 17, 2019 at San Francisco, California.

/s/ Eric S. Somers

Eric S. Somers

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

LLG | LEXINGTON LAW GROUP

503 Divisadero Street, San Francisco, California 94117-2212
Telephone (415) 913-7800 Facsimile (415) 759-4112

MISSION STATEMENT

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

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

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

CASES AND RESULTS

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

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

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- False Advertising of Anti-Aging Products: Successfully prosecuted consumer protection action against maker of multi-million dollar "snake oil" product line falsely advertised as anti-aging cancer cure. (*Center for Environmental Health v. Almon Glenn Braswell*).

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- Health Risks From Kava Kava: Represented class of consumers of Kava Kava dietary supplements against more than thirty-five defendants in case about failure to disclose the risk of liver disease from the products. (*In Re: Kava Kava Litigation*).

- Second Hand Smoke: Represented the City of San Jose and a private plaintiff in suit against major tobacco companies regarding failure to warn about second hand smoke in violation of California law. (*In Re Tobacco Cases II*).

- Tobacco Advertising: Represented non-profit group in case against outdoor advertising company defendants alleging violations of California's STAKE Act, which prohibits tobacco advertising within 1,000 feet of public schools, that resulted in the removal of hundreds of tobacco billboards located near schools in California. (*Center For Environmental Health v. Eller Media Corporation, et al.*).

ATTORNEY BACKGROUND AND EXPERIENCE

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

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

Attorney General and other public enforcement agencies.

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

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

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

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

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

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

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

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

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

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

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

EXHIBIT B

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

Firm Name: Lexington Law Group

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Eric Somers - ESS (P)									0.20	1.20		2.10			3.50	$850.00	$2,975.00
Joseph Mann - JJM (A)									0.10	1.60	0.20	4.70			6.60	$650.00	$4,290.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.30**	**2.80**	**0.20**	**6.80**	**0.00**	**0.00**	**10.10**		**$7,265.00**
NON-ATTORNEYS																	
Leslie Valpey - LGV (PL)												0.20			0.20	$235.00	$47.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**0.00**	**0.00**	**0.20**		**$47.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.30**	**2.80**	**0.20**	**7.00**	**0.00**	**0.00**	**10.30**		**$7,312.00**

EXHIBIT C

Lexington Law Group
Batteries Time Detailed - Historic Rates

Date	Staff	Category	Description	Time	Value
3/1/2017	JJM	12	Email from ESS re [redacted].	0.10	$57.00
3/6/2017	JJM	11	Confer, email w/ ESS re [redacted].	0.10	$57.00
4/14/2017	ESS	10	Review order denying class certification in order to discuss with JJM and explain to client J. Ames.	1.20	$924.00
4/17/2017	JJM	10	Confer w/ ESS re [redacted] (0.3); review order on [redacted] (0.4); email, TC w/ J. Ames re [redacted] (0.8).	1.50	$855.00
4/18/2017	JJM	11	Email w/ ESS re [redacted]	0.10	$57.00
4/18/2017	ESS	12	Review letter re [redacted] (0.3). Meet with JJK re [redacted] (1.1)	1.40	$1,078.00
5/15/2017	LGV	12	Assemble and send class representative J. Ames deposition travel receipts to J. Mann for expense award.	0.20	$47.00
5/22/2017	ESS	12	Review requests from Class Counsel re [redacted] and meet with JJM re [redacted]	0.50	$385.00
5/22/2017	JJM	12	Email from K. Good re [redacted] (0.1); review/edit [redacted] (0.7); confer w/ ESS re [redacted] (0.1); email J. Ames re reviewing [redacted] (0.2).	1.10	$627.00
5/23/2017	JJM	12	Email w/ J. Ames re [redacted] award (0.1); finalize [redacted] (0.1); email w/ J. Anderson re [redacted] (0.1).	0.30	$171.00
5/24/2017	ESS	9	Review letter from class counsel re [redacted].	0.20	$154.00
7/19/2017	JJM	10	Review Order setting renewed class certification briefing schedule.	0.10	$57.00
9/6/2017	JJM	12	Email w/ ESS re [redacted].	0.10	$57.00
3/22/2018	JJM	12	Exchange emails w/ ESS re [redacted].	0.10	$57.00
4/9/2018	JJM	9	Exchange emails w/ ESS re [redacted].	0.10	$57.00
6/25/2018	JJM	12	Review letter from S. Scarlett re [redacted] (0.1); exchange emails w/ ESS re [redacted] (0.1).	0.20	$114.00
6/27/2018	JJM	12	Send email to S. Scarlett re [redacted] (0.2); send email to J. Ames re [redacted] (0.1).	0.30	$171.00
6/28/2018	JJM	12	Exchange emails w/ J. Ames re [redacted] (0.2); review email from Ames to J. Decena re [redacted] (0.1); review email from Decena re [redacted] (0.1); review [redacted] (0.3).	0.70	$399.00
6/29/2018	JJM	12	Review [redacted] (0.2); confer w/ ESS re [redacted] (0.1).	0.30	$171.00
6/30/2018	JJM	12	TC w/ J. Ames re [redacted] (0.1); send email to S. Scarlett re [redacted] (0.1).	0.20	$114.00
7/17/2018	JJM	12	Review IPP status report re [redacted]	0.10	$57.00
7/24/2018	JJM	12	Review A. Zapala letter re [redacted] (0.1); exchange emails, TC w/ J. Ames re [redacted] (0.2); send email to Zapala re [redacted] (0.1).	0.40	$228.00
11/16/2018	JJM	12	Review email from B. Miller re [redacted] (0.1); review [redacted] (0.2); confer w/ ESS re [redacted] (0.1); exchange emails, TC w/ J. Ames re [redacted] (0.2).	0.60	$342.00
11/19/2018	ESS	12	Exchange call with B. Van Engelen re [redacted].	0.20	$154.00
11/19/2018	JJM	12	Confer w/ ESS re [redacted] (0.1); send email to B. Miller re [redacted] (0.1).	0.20	$114.00
GRAND TOTAL				10.30	$6,504.00

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
LEXINGTON LAW GROUP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

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

EXHIBIT 43

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ERIC S. SOMERS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF LEXINGTON LAW GROUP**

I, Eric S. Somers, declare:

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

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

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

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

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

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

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

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

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

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

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

/s/ Eric S. Somers

Eric S. Somers

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

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- False Advertising of Anti-Aging Products: Successfully prosecuted consumer protection action against maker of multi-million dollar "snake oil" product line falsely advertised as anti-aging cancer cure. (*Center for Environmental Health v. Almon Glenn Braswell*).

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- Nursing Home Staffing Litigation: Class action and private attorney general lawsuits against dozens of skilled nursing facilities that resulted in agreements to increase minimum staffing levels as required by California law. (*Foundation Aiding the Elderly v. Covenant Care, et al.*).

- Health Risks From Kava Kava: Represented class of consumers of Kava Kava dietary supplements against more than thirty-five defendants in case about failure to disclose the risk of liver disease from the products. (*In Re: Kava Kava Litigation*).

- Second Hand Smoke: Represented the City of San Jose and a private plaintiff in suit against major tobacco companies regarding failure to warn about second hand smoke in violation of California law. (*In Re Tobacco Cases II*).

- Tobacco Advertising: Represented non-profit group in case against outdoor advertising company defendants alleging violations of California's STAKE Act, which prohibits tobacco advertising within 1,000 feet of public schools, that resulted in the removal of hundreds of tobacco billboards located near schools in California. (*Center For Environmental Health v. Eller Media Corporation, et al.*).

ATTORNEY BACKGROUND AND EXPERIENCE

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

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

Attorney General and other public enforcement agencies.

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

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

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

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

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

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

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

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

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

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

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

EXHIBIT B

EXHIBIT B

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

Firm Name: Lexington Law Group

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Eric Somers (P)	7.80		5.40		3.20				4.40		1.20	2.20			24.20	$770.00	**$18,634.00**
Howard Hirsh (P)															0.00	$650.00	**$0.00**
Mark Todzo (P)											0.30				0.30	$750.00	**$225.00**
Lisa Burger (A)											0.20				0.20	$460.00	**$92.00**
Victoria Hartanto (A)															0.00	$430.00	**$0.00**
Lucas Williams (A)															0.00	$430.00	**$0.00**
Joe Mann (A)	5.10		16.50		37.00	7.80		1.00	10.10	0.30	3.00	5.50			86.30	$570.00	**$49,191.00**
SUB-TOTAL	**12.90**	**0.00**	**21.90**	**0.00**	**40.20**	**7.80**	**0.00**	**1.00**	**14.50**	**0.30**	**4.70**	**7.70**	**0.00**	**0.00**	**111.00**	**$4,060.00**	**$68,142.00**
NON-ATTORNEYS																	
John Banister (PL)											1.00				1.00	$235.00	**$235.00**
Casey Kasher (PL)											0.60				0.60	$225.00	**$135.00**
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.60**	**0.00**	**0.00**	**0.00**	**1.60**	**$460.00**	**$370.00**
GRAND TOTAL:	**12.90**	**0.00**	**21.90**	**0.00**	**40.20**	**7.80**	**0.00**	**1.00**	**14.50**	**0.30**	**6.30**	**7.70**	**0.00**	**0.00**	**112.60**	**$4,520.00**	**$68,512.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

LEXINGTON LAW GROUP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Eric Somers (P)	11/15/12 - 2/28/17	$770.00
Howard Hirsh (P)	11/15/12 - 2/28/17	$650.00
Mark Todzo (P)	11/15/12 - 2/28/17	$750.00
Lisa Burger (A)	11/15/12 - 2/28/17	$460.00
Victoria Hartanto (A)	11/15/12 - 2/28/17	$430.00
Lucas Williams (A)	11/15/12 - 2/28/17	$430.00
Joe Mann (A)	11/15/12 - 2/28/17	$570.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
John Banister (PL)	11/15/12 - 2/28/17	$235.00
Casey Kasher (PL)	11/15/12 - 2/28/17	$225.00

EXHIBIT D

(REDACTED)

Lexington Law Group
Batteries Time Detailed

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

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

Batteries Time Detailed

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

Batteries Time Detailed

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

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Batteries Time Detailed

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

Batteries Time Detailed

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

Batteries Time Detailed

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

Batteries Time Detailed

3/18/2016	JMann	5	Review errata sheet for [redacted] depo transcript (0.1); research Fed. R. Civ. P. re permissible scope for errata (0.2); review transcript for potential corrections (1.3); email [redacted] re reviewing transcript (0.3).	1.90	$1,083.00
3/21/2016	ESomers	9	Review 4th Amended Complaint at request of Class Counsel prior to sending to class reps for review.	0.80	$616.00
3/21/2016	ESomers	12	Review Sony settlement at request of Class Counsel in preparation to send to [redacted]	0.70	$539.00
3/21/2016	JMann	12	Email from ESS to D. Lambrinus re Sony proposed settlement, need to S. Hiller to review same (0.1); TC w/ ESS re issues on Sony settlement (0.1); email, TC w/ [redacted] re same (0.5); email Lambrinus re [redacted] ok w/ settlement (0.1).	0.80	$456.00
3/21/2016	ESomers	12	Send inquiry to D. Lambrinus re [redacted] listing as class rep in Sony settlement agreement.	0.20	$154.00
3/21/2016	JMann	3	Email, TC w/ D. Lambrinus re additional ESI search for [redacted] in response to RFPs (0.2); email, TC w/ [redacted] re same (0.6).	0.80	$456.00
3/21/2016	JMann	5	Email w/ K. Pachman re R. Hyams depo cancelled.	0.10	$57.00
3/21/2016	ESomers	3	Review request for ESI from [redacted] (0.1). Discuss issues with JJM (0.1). Review letter brief re issue (0.1).	0.30	$231.00
3/21/2016	JMann	5	Email w/ K. Pachman re potential corrections for [redacted] depo transcript (0.1); email [redacted] re transcript certification/errata sheets (0.2).	0.30	$171.00
3/22/2016	JMann	5	Email from [redacted] re signed depo transcript certification/errata sheets (0.1); email w/ K. Pachman re same (0.1).	0.20	$114.00
3/22/2016	JMann	3	Email from B. Kim (Discovery Solutions), [redacted] re remote ESI collection for [redacted] in response to RFPs.	0.10	$57.00
3/23/2016	JMann	3	Email from D. Lambrinus re e-conference on additional ESI search for J. Ames in response to RFPs (0.1); review docs in preparation for same (0.2); attend e-conference (1.7).	2.00	$1,140.00
3/28/2016	JMann	3	Email from [redacted] (Discovery Solutions) re remote metadata search for [redacted] in response to RFPs.	0.10	$57.00
3/30/2016	JMann	5	Confer w/ ESS re issues on [redacted] depo transcript.	0.10	$57.00
3/31/2016	JMann	5	Email from ESS, K. Pachman re issues on [redacted] depo transcript.	0.10	$57.00
4/4/2016	JMann	6	[redacted]	0.10	$57.00
4/6/2016	JMann	3	Email from Pachman to [redacted] discovery docs (0.1); email w/ D. Lambrinus re [redacted] camcorder purchase (0.2).	0.30	$171.00
4/6/2016	JMann	6	Email w/ D. Lambrinus, ESS re continuing conference call on [redacted] ESI search (0.2); email [redacted] re same (0.3).	0.50	$285.00
4/6/2016	ESomers	3	Respond to e-mails from lead counsel re [redacted] discovery requests.	0.40	$308.00
4/7/2016	JMann	6	Email w/ D. Lambrinus, B. Kim (Discovery Solutions) re conference call on [redacted] ESI search (0.1); email w/ [redacted] (0.1).	0.20	$114.00
4/8/2016	JMann	3	Review supplemental RFPs & proposed responses.	0.10	$57.00
4/8/2016	JMann	6	Email from D. Lambrinus re materials for conference call on [redacted] ESI search (0.1); conference call w/ Lambrinus, Discovery Solutions, [redacted] re same (1.2); confer w/ ESS re results of same (0.1).	1.40	$798.00
4/11/2016	JMann	3	Email w/ D. Lambrinus re [redacted] response to Defendants' 3rd Set of Rogs (0.1); review responses (0.2); email [redacted] re reviewing same (0.1).	0.40	$228.00
4/14/2016	JMann	3	Email w/ [redacted] D. Lambrinus re signed verification on response to Defendants' 3rd Set of Rogs.	0.10	$57.00

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

Batteries Time Detailed

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

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
LEXINGTON LAW GROUP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

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

EXHIBIT 44

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF PEGGY WEDGWORTH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES ON BEHALF OF MILBERG TADLER PHILLIPS GROSSMAN LLP**

I, Peggy Wedgworth, declare:

1. I am a partner of Milberg Tadler Phillips Grossman LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Valentina Juncaj and as counsel for IPPs throughout the course of this litigation. The background and experience of Milberg Tadler Phillips Grossman LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Milberg Tadler Phillips Grossman LLP performed the following work: responding to initial and supplemental discovery requests on behalf of our client and the class, corresponding and coordinating with co-counsel and our client regarding discovery obligations, and preparing our client for a potential deposition.

5. A summary of work performed by Milberg Tadler Phillips Grossman LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Peggy Wedgworth in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Milberg LLP and filed on May 26, 2017. (ECF No. 1813-28).[1] Counsel for Plaintiffs did not and do not seek attorneys' fees for

[1] At that time my firm was Milberg LLP. In January 2018, Milberg LLP restructured into Milberg (footnote continued)

any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Milberg Tadler Phillips Grossman LLP since June 1, 2013 was 42.8, with a corresponding lodestar based on current rates of $15,187.50.

7. Milberg Tadler Phillips Grossman LLP is not submitting a request for reimbursement of costs and expenses in connection with this case.[2]

8. I have reviewed the time reported by Milberg Tadler Phillips Grossman LLP in this case which is included in this declaration, and I affirm that it is true and accurate.

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

Executed on April 5, 2019 at Washington, D.C.

/s/ Peggy Wedgworth
Peggy Wedgworth

Tadler Phillips Grossman LLP. Milberg LLP is a partner in Milberg Tadler Phillips Grossman LLP.

[2]Upon further investigation, we have reduced our unreimbursed expenses in this litigation in our previous Motion For An Award Of Attorneys' Fees And Reimbursement Of Expenses On Behalf Of Milberg LLP (ECF 1813-28) from $1,387.27 to $0.00.

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

MILBERG
TADLER PHILLIPS GROSSMAN LLP

NEW YORK
LOS ANGELES

THE FIRM'S PRACTICE AND ACHIEVEMENTS

Milberg Tadler Phillips Grossman LLP ("MTPG") helps clients challenge corporate wrongdoing through class action, mass tort, personal injury, consumer, and shareholder rights services. MTPG was established in 2018 by members of Milberg LLP, a leading class action and complex litigation firm, and Sanders Phillips Grossman LLC, a nationally recognized plaintiffs' law firm representing consumers in mass tort and personal injury cases.[1] MTPG is headquartered in New York City and works with a network of lawyers located across the country.

Milberg LLP, founded in 1965, took the lead in landmark cases that set groundbreaking legal precedents and prompted changes in corporate governance benefitting shareholders and consumers. Milberg LLP pioneered federal class action litigation and is widely recognized as a leader in defending the rights of victims of corporate and other large-scale wrongdoing. It has been responsible for recoveries valued at approximately $56 billion during the life of the firm.

Sanders Phillips Grossman LLC provides exemplary legal representation in the practice areas of Defective Drugs, Defective Medical Devices, Consumer Fraud, Whistleblower, Class Actions, Catastrophic Injury, and Toxic Exposure. As a nationally recognized leading plaintiffs' law firm for the past three decades, the firm and its predecessors have recovered more than one billion dollars for injured consumers. Sanders Phillips Grossman has offices in Seattle, WA; Los Angeles, CA; and Puerto Rico.

Through these firms' strategic partnership, MTPG represents government entities and individuals who have suffered harm from securities fraud, data breaches, antitrust violations, consumer fraud, corporate misconduct, opioids, water contamination, and a wide range of commercial and pharmaceutical malfeasance.

MTPG's ability to pursue claims against defendants is augmented by its investigators, headed by a 27-year veteran of the Federal Bureau of Investigation. The firm's lawyers have been regularly recognized as leaders in the plaintiffs' bar by the National Law Journal, Legal 500, Chambers USA, and Super Lawyers, among others.

MTPG'S LAWYERS ARE INDUSTRY LEADERS IN A VARIETY OF PRACTICE AREAS

Securities and Financial Litigation and Arbitration: In its early years, Milberg LLP built a new area of legal practice in representing shareholder interests under the then recently amended Rule 23 of the Federal Rules of Civil Procedure, which allowed securities fraud cases, among others, to proceed as class actions. MTPG's attorneys have since represented plaintiffs in an array of financial cases, including securities class actions, derivative litigations, accounting malpractice disputes, and FINRA arbitrations. Significant litigation results include: *In re Vivendi Universal, S.A. Securities Litigation* (jury verdict for plaintiff class in January 2010); *In re Tyco International, Ltd. Securities Litigation* ($3.2 billion settlement); *In re Nortel Networks Corp. Securities Litigation* (settlement for cash and stock valued at $1.142 billion); *In re Merck & Co., Inc. Securities Litigation*, Nos. 05-1151 and 05-2367 (D.N.J.) (a $1.062 billion recovery); *In re Comverse Technology, Inc. Derivative Litigation*, No. 601272/2006 (N.Y. Sup. Ct. N.Y. Cnty.) ($62 million settlement which also resulted in significant corporate governance reforms).

Consumer Litigation: MTPG's lawyers have long been leaders in protecting consumers from fraudulent and deceptive practices. For example, MTPG lawyers are part of the Court-appointed

[1] As of January 1, 2018, Milberg LLP's lawyers are now prosecuting new and active cases out of MTPG.

Plaintiffs' Executive Committee in *In re Apple, Inc. Device Performance Litigation*, 5:18-MD-02827-EJD (N.D. Cal.), a class action alleging Apple throttled the performance of certain devices, including iPhones, with degraded batteries.

MTPG lawyers also serve as co-lead counsel in class actions challenging the use of "natural" labeling on food products made with crops grown from seeds that have been genetically engineered using sophisticated laboratory techniques (GMOs). *In re Conagra Foods, Inc,*, No.11-05379 (M.D. Cal.) (multi-state class certified; affirmed by Ninth Circuit; petition for *writ of certiorari* denied by U.S. Supreme Court); *Frito-Lay North America, Inc. "All Natural" Litigation,* No. 12-MD-02413 (E.D.N.Y) (resolved by a court-approved settlement). Other representative consumer matters include *Correa v. Sensa Products, LLC.*, No. BC476808 (Cal. Super. Court, Los Angeles Cty.) ($9 million settlement in case alleging that the defendant, manufacturer of a weight-loss product, lacked a sufficient scientific basis for certain of its marketing claims); *In re Shop-Vac Marketing and Sales Practices Litigation*, No. 4:12-md-02380 (M.D. Pa.) (class action against Shop-Vac and Lowe's alleging that the companies misrepresented the tank capacity and horsepower of its wet/dry vacuums; settlement led to extended warranties and marketing and advertising changes); *Novak v. Pacific Bioscience Laboratories Products, Inc., and Pacific Bioscience Laboratories Products, Inc.,* Case No. BC582188 (Cal. Super. Court, Los Angeles Cty.) (pending case alleging that batteries in certain Clarisonic skin brushes are defective; motion for approval of settlement, which would extend owners' warranties and require the repair or replacement of affected brushers).

Data Breach and Privacy Litigation: MTPG's Data Breach and Privacy Practice Group litigates class actions alleging massive data breaches and other violations of consumers' personal and data privacy. Its attorneys have spearheaded numerous highly technical cases and have successfully advanced novel legal theories to protect consumers from ever-evolving cybersecurity and data privacy threats. Representative matters include *In re Equifax, Inc. Customer Data Breach Litigation*, 17-md-02800 (N.D. Ga.) (appointed to Plaintiffs' Steering Committee ("PSC")); *In re Yahoo Inc. Customer Data Security Breach Litigation*, No. 5:16-MD-02752 (N.D. Cal.) (appointed to the Plaintiffs' Executive Committee); *In re Target Corporation Customer Data Security Breach Litig.*, No. 14-md-2522 (D. Minn.) (appointed to the PSC; achieved a $10 million settlement (pending appeal)); *Torres, et al. v. Wendy's International, LLC*, 16-cv-00210 (M.D. Fla.) (plaintiffs' counsel; $3.4 million class action settlement awaiting final Court approval); *Fero v. Excellus Health Plan*, No. 6:16-cv-06569 (W.D.N.Y.) (special discovery counsel to lead counsel); *In re Anthem, Inc. Data Breach*, No. 15-MD-02617 (N.D. Cal.) (plaintiffs' counsel; settlement created a $115 million non-reversionary cash fund, delivered more than $500 million in value to the class, and required extensive injunctive relief to prevent a future breach (pending approval)); *In re Premera Blue Cross Customer Data Breach Litig.*, No. 3:15-md-2633-SI (D. Or.) (plaintiffs' counsel); *Carandang v. Google, Inc.* CGC-12-518415 (Cal. Super., San Francisco Cty.) (plaintiff's counsel; reached confidential resolution); *Ung, et al, v. Facebook, Inc.,* 1-12-CV-217244 (Cal. Super., Santa Clara Cty.) (plaintiff's counsel).

Antitrust: MTPG's Antitrust Practice Group prosecutes large, complex antitrust and trade regulation class actions and other cases that target some of the most powerful and well-funded corporate interests in the world. It has played an important role in many cases involving price-fixing, supply manipulation, tying arrangements, exclusive dealing, and refusals to deal. Significant antitrust cases include *In re Dealer Management Systems Antitrust Litigation*, 18-cv-00864 (N.D. Ill.) (Interim Lead Class Counsel for auto dealerships in a pending class action alleging anticompetitive practices in the markets for dealer management systems and data integration services); *Blessing v. Sirius XM Radio Inc.*, No. 09-cv-10035 (S.D.N.Y.) (Co-Lead Counsel; class settlement valued at $180 million); *Sandhaus v. Bayer AG, et al.*, No. 00-cv-6193 (D. Kan.) (Co-Lead Counsel, secured largest consumer recovery from a pay-for-delay case in Kansas: $9 million settlement); and *In re Fresh & Process Potatoes Antitrust Litig.*, No. 4:10-md-2186 (D. Idaho) (Co-Lead Counsel for Indirect Purchaser Plaintiffs, $5.5 million

settlement and agreed upon injunctive relief). The MTPG Antitrust Practice Group continues to act in a number of significant and ongoing antitrust cases including *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J. 2015) (Plaintiffs' Steering Committee member); *In re Processed Eggs Antitrust Litig.*, MDL No. 2002 (E.D. Pa., 2008) (Indirect Purchaser Plaintiffs' Co-Lead Counsel); and *In re Disposable Contact Lens Antitrust Litigation*, No. 3:15-md-02626 (M.D. Fla. 2015).

False Claims Act Litigation: MTPG attorneys have expertise in a wide range of federal and state false claims act ("FCA") cases and have returned hundreds of millions of dollars to federal and state treasuries. Their successful results include: *CareCore* (alleging that CareCore violated the FCA by approving "prior authorizations" for expensive diagnostic procedures without reviewing them for medical necessity. The government intervened, the case settled for $54 million, and the relator received a 20% ($10.5 million) share of the settlement); *Bank of America* (alleging that Bank of America improperly recouped insurance proceeds from the U.S. Department of Housing and Urban Development. Settled as part of the $16.65 billion global settlement regarding Bank of America's mortgage practices – the largest civil settlement with a single entity in American history); *CareAll* (alleging one of Tennessee's largest home healthcare providers made fraudulent submissions of Medicare and Medicaid claims. The government intervened and the case settled for $25 million with a relator's share of $3.9 million); *Medline* (case arising from unlawful kickbacks, bribes, and other illegal remuneration to induce health care providers to continue to purchase defendant's medical supplies in which the government declined to intervene. The resulting $85 million settlement is one of the largest settlements of a non-intervened FCA case to date.); *Bristol-Myers Squibb* (FCA case brought in connection with the company's "off-label" promotion and sales of an anti-psychotic drug. One of seven FCA actions that formed the basis of the government's investigation into BMS's illegal marketing tactics which resulted in a total settlement of over $515 million.).

E-Discovery: Among the first plaintiffs' firms in the country to assemble and train a dedicated team to meet the e-discovery demands of complex litigation, Milberg LLP, at Ariana J. Tadler's direction, developed some of the most exceptional e-discovery capabilities among U.S. law firms. Established more than 15 years ago, that e-discovery practice has grown extensively and today, MTPG offers clients the ability to go toe-to-toe with adversaries in the fast-evolving e-discovery climate. This multidisciplinary group offers clients a full array of counsel services relating to discovery strategy, data preservation, data collection and storage, sophisticated data search and analysis, production, and computer forensic investigation, as well as training on e-discovery issues, including application of the recent amendments to the Federal Rules of Civil Procedure, local rules, and state law. MTPG's e-discovery attorneys are regularly called on by attorneys and courts to oversee complex discovery in high-stakes litigation. *E.g., In re Apple, Inc. Device Performance Litigation*, 5:18-MD-02827-EJD (N.D. Cal.) (appointed to Plaintiffs' Executive Committee and responsible for ESI and offensive discovery); *In re Equifax, Inc. Customer Data Breach Litigation*, 17-md-02800 (N.D. Ga.) (appointed to Plaintiffs' Steering Committee and responsible for leading discovery); *In re Yahoo Inc. Customer Data Security Breach Litigation*, No. 5:16-MD-02752 (N.D. Cal.) (appointed to Plaintiffs' Executive Committee and responsible for leading discovery); *In re Target Corporation Customer Data Security Breach Litig.*, No. 14-md-2522 (D. Minn.) (appointed to the PSC and charged with leading discovery); *Fero v. Excellus Health Plan*, No. 6:16-cv-06569 (W.D.N.Y.) (special discovery counsel to lead counsel).

NOTEWORTHY RESULTS AND PRECEDENT-SETTING DECISIONS

The quality of MTPG's representation is further evidenced by Milberg LLP's and MTPG's numerous significant recoveries and successes. Those firms and their attorneys have also been responsible for establishing many important precedents. Some of those achievements are described below:

- ***In re Merck & Co., Inc. Securities Litigation***, Nos. 05-1151 and 05-2367 (D.N.J.). Milberg LLP served as co-lead counsel in this federal securities fraud class action, and following over 12 years of hard-fought litigation, ultimately obtained a combined settlement totaling $1.062 billion, the largest securities class action settlement ever against a pharmaceutical company, which received final approval on June 28, 2016. This lawsuit involved claims under the Securities Exchange Act of 1934 against Merck and certain of its executives arising out of allegations that defendants made materially false and misleading statements concerning the safety profile and commercial viability of Merck's purported "blockbuster" drug VIOXX. During this litigation, Milberg LLP and co-lead counsel engaged in exhaustive discovery, including the review and analysis of over 35 million pages of documents involving complex scientific and medical issues, as well as the examination of over 59 fact and expert witnesses. Plaintiffs successfully appealed the dismissal of this action on state of limitations grounds to the Third Circuit Court of Appeals, and prevailed in defendants' further appeal to the Supreme Court, resulting in a unanimous decision by the Supreme Court in Plaintiffs' favor which clarified the law regarding the application of the statute of limitations to federal securities fraud claims. Plaintiffs' claims also survived additional motions to dismiss and motions for summary judgment, and the parties reached settlement less than three months before trial was scheduled to commence.
- ***In re Oppenheimer Rochester Funds Group Securities Litigation,*** No. 09-md-02063-JLK-KMT (D. Colo.). Milberg LLP, serving as co-lead counsel, litigated this complex securities class action brought on behalf of six separate classes of defrauded investors and obtained settlements totaling $89.5 million in cash for the classes.
- ***In re Vivendi Universal, S.A. Securities Litigation***, No. 02-5571 (S.D.N.Y.). Milberg LLP lawyers served among lead trial counsel and obtained a jury verdict for a class of defrauded investors after a trial lasting nearly four months. The jury found Vivendi liable for 57 false or misleading class period statements. At the close of the trial, Judge Richard Holwell commented, "I can only say that this is by far the best tried case that I have had in my time on the bench. I don't think either side could have tried the case better than these counsel have."
- ***In re Target Corporation Customer Data Security Breach Litigation***, No. 14-md-02522-PAM (D. Minn.). Partner Ariana J. Tadler serves on the Steering Committee guiding the landmark data breach case. In addition to participating in overall case strategy, the drafting of pleadings and motions, and settlement negotiation, the Milberg LLP team was responsible for leading discovery, which included targeted discovery requests, the establishment of a series of discovery protocols, the selection of a data-hosting provider, and discovery motion practice that involved unique topics warranting special attention. The case, which involved an estimated 110 million consumers whose personal information was compromised, settled for $10 million, entitling individual consumers to recover losses up to $10,000. (An appeal remains pending before the Eighth Circuit.)
- ***In re Conagra Foods, Inc.,*** **No.11-05379 (M.D. Cal.).** The firm is co-lead counsel in a class action against ConAgra Foods, Inc., the maker of Wesson Oils, concerning the company's use of the phrase "100% Natural" to market food products made with crops grown from seeds that have been genetically engineered using sophisticated

laboratory techniques. The District Court certified eleven separate statewide classes of Wesson purchasers. ConAgra appealed the class certification order to the Ninth Circuit Court of Appeals, which affirmed in a decision considered extremely favorable to consumer class actions. Conagra petitioned the U.S. Supreme Court for review of the Ninth Circuit's decision. The Supreme Court denied the petition.

- ***In re Chase Bank USA, N.A. "Check Loan" Contract Litig.***, No. 09-2032 (N.D. Cal.). Milberg LLP served on the Executive Committee representing the class in this action against JP Morgan Chase & Co. The complaint alleged that Chase improperly increased by 150% the minimum monthly payment requirement for customers who entered into balance transfer loans with "fixed" interest rates that were guaranteed to remain so for the "life of the loan." Milberg and its co-counsel achieved a $100 million settlement for the class.
- ***Mason v. Medline***, No. 07-05615 (N.D. Ill.). Milberg LLP successfully represented a healthcare worker in a False Claims Act case against his former employer, Medline Industries, Inc., one of the nation's largest suppliers of medical and surgical products, along with its charitable arm, The Medline Foundation. The suit alleged that Medline engaged in a widespread illegal kickback scheme targeting hospitals and other healthcare providers that purchase medical products paid for by federal healthcare programs. Although a party to the settlement agreement, the U.S. Department of Justice chose not to intervene in the lawsuit. Milberg LLP pursued the case on a non-intervened basis and recovered $85 million on behalf of the federal government -- one of the largest settlements of a False Claims Act case in which the government declined to intervene. The whistleblower was awarded 27.5% of the proceeds.
- ***Blessing v. Sirius XM Radio, Inc.***, No. 09-10035 (S.D.N.Y.). This antitrust case stemmed from the 2008 merger of Sirius Satellite Radio, Inc. and XM Satellite Holdings, Inc. that created Sirius XM, the nation's only satellite radio company. The plaintiffs alleged that the merger of the only two U.S. satellite radio providers was an illegal move to eliminate competition and monopolize the satellite radio market. Before the merger, Sirius CEO Mel Karmazin convinced regulators not to block the deal by promising that "the combined company will not raise prices" and that the merger would actually result in "lower prices and more choice for the consumer." After the merger, Sirius quickly reversed course, raised prices by 15-40%, and eliminated multiple radio stations. Milberg LLP achieved a settlement for the class valued at $180 million.
- ***In re Initial Public Offering Securities Litigation***, No. 21-MC-92 (S.D.N.Y.). Milberg LLP represented investors in 300+ consolidated securities actions arising from an alleged market manipulation scheme. Plaintiffs alleged, among other things, that approximately 55 defendant investment banks, in dealing with certain of their clients, conditioned certain allocations of shares in initial public offerings on the subsequent purchase of more shares in the aftermarket, thus artificially boosting the prices of the subject securities. This fraudulent scheme, plaintiffs alleged, was a major contributing factor in the now infamous technology "bubble" of the late 1990s and early 2000s. As a member of the court-appointed Plaintiffs' Executive Committee, and with certain partners appointed by the court as liaison counsel, Milberg LLP oversaw the efforts of approximately 60 plaintiffs' firms in combating some of the most well-respected defense firms in the nation. In granting final approval to a $586 million settlement on

October 5, 2009, the court described the law firms comprising the Plaintiffs' Executive Committee as the "cream of the crop."

- ***In re Tyco International Ltd., Securities Litigation***, MDL 1335 (D.N.H.). Milberg LLP served as co-lead counsel in this litigation, which involved claims under the Securities Act of 1933 and the Securities Exchange Act of 1934 against Tyco and its former CEO, CFO, general counsel, and certain former directors arising out of allegations of Tyco's $5.8 billion overstatement of income and $900 million in insider trading, plus hundreds of millions of dollars looted by insiders motivated to commit the fraud. Plaintiffs also asserted claims under the 1933 and 1934 Acts against PricewaterhouseCoopers LLP for allegedly publishing false audit opinions on Tyco's financial statements during the class period and failing to audit Tyco properly, despite knowledge of the fraud. On December 19, 2007, the court approved a $3.2 billion settlement of the plaintiffs' claims lauded Milberg LLP's efforts as co-lead counsel:

This was an extraordinarily complex and hard-fought case. Co-Lead Counsel put massive resources and effort into the case for five long years, accumulating [millions of dollars in expenses] and expending [hundreds of thousands of hours] on a wholly contingent basis. But for Co-Lead Counsel's enormous expenditure of time, money, and effort, they would not have been able to negotiate an end result so favorable for the class. . . . Lead Counsel's continued, dogged effort over the past five years is a major reason for the magnitude of the recovery. . . .

535 F. Supp. 2d 249, 270 (D.N.H. 2007).

- ***In re Biovail Corp. Securities Litigation***, No. 03-8917 (S.D.N.Y.). Milberg LLP, representing Local 282 Welfare Trust Fund and serving as co-lead counsel, litigated this complex securities class action brought on behalf of a class of defrauded investors, alleging that defendants made a series of materially false and misleading statements concerning Canadian company Biovail's publicly reported financial results and the company's then new hypertension/blood pressure drug, Cardizem LA. This was a highly complex case in which counsel took numerous depositions across the U.S. and Canada and obtained documents from defendants and several third-parties, including, among others, UBS, McKinsey & Co., and Merrill Lynch. Milberg LLP obtained a $138 million settlement for the class, and Biovail agreed to institute significant corporate governance changes.
- ***In re Nortel Networks Corp. Securities Litigation***, No. 01-1855 (S.D.N.Y.). In this federal securities fraud class action, Milberg LLP served as lead counsel for the class and the court-appointed lead plaintiff, the Trustees of the Ontario Public Service Employees' Union Pension Plan Trust Fund. In certifying the class, the court specifically rejected the defendants' argument that those who traded in Nortel securities on the Toronto Stock Exchange (and not the New York Stock Exchange) should be excluded from the class. The Second Circuit denied the defendants' attempted appeal. On January 29, 2007, the court approved a settlement valued at $1.142 billion.
- ***In re CMS Energy Corp. Securities Litigation***, No. 02-72004 (E.D. Mich.). Milberg LLP served as co-lead counsel in this federal securities fraud case arising out of alleged round-trip trading practices by CMS Energy Corporation, Judge Steeh approved a cash settlement of more than $200 million.
- ***In re Deutsche Telekom AG Securities Litigation***, No. 00-9475 (S.D.N.Y.). Milberg LLP served as co-lead counsel in

this securities class action alleging that Deutsche Telekom issued a false and misleading registration statement, which improperly failed to disclose its plans to acquire VoiceStream Wireless Corporation and materially overstated the value of the company's real estate assets. In June 2005, Judge Buchwald approved a $120 million cash settlement.

- ***In re Comverse Technology, Inc. Derivative Litigation***, No. 601272/2006 (N.Y. Sup. Ct. N.Y. Cnty.). On December 28, 2009, Milberg LLP announced a $62 million settlement for the derivative plaintiffs, which was approved by the Court on June 23, 2010. The settlement also resulted in significant corporate governance reforms, including the replacement of the offending directors and officers with new independent directors and officers; the amendment of the company's bylaws to permit certain long-term substantial shareholders to propose, in the Company's own proxy materials, nominees for election as directors (proxy access); and the requirement that all equity grants be approved by both the Compensation Committee and a majority of the non-employee members of the Board.
- ***In re Topps Co., Inc. Shareholder Litig.***, No. 600715/2007 (N.Y. Sup. Ct. N.Y. Cnty. Apr. 17, 2007). Milberg LLP served as co-lead counsel in this transactional case, which led to a 2007 decision vindicating the rights of shareholders under the rules of comity and the doctrine of *forum non conveniens* to pursue claims in the most relevant forum, notwithstanding the fact that jurisdiction might also exist in the state of incorporation. This case was settled in late 2007 in exchange for a number of valuable disclosures for the class.
- ***Platinum Partners v. Chicago Board Options Exchange, Inc.***, No. 1-11-2903 (Ill. App. Ct. 2012). Milberg LLP represented an investment management group in a case against the Chicago Board Options Exchange, Inc. ("CBOE") and Options Clearing Corp. ("OCC"). The plaintiff investment management group alleged that it was injured when the CBOE and OCC privately disclosed strike price information to certain insiders prior to the information being made public. In the interim between the private disclosure and the public announcements, the plaintiff purchased tens of thousands of affected options. The lower court dismissed the complaint on the grounds that the CBOE and OCC, as self-regulatory organizations, were immune from suit. However, the Appellate Court reversed, holding that a private disclosure to insiders served no regulatory purpose and should not be protected from suit. The Illinois Supreme Court declined the defendants' petition for leave to appeal.
- ***In re Lord Abbett Mutual Funds Fee Litigation***, 553 F.3d 248 (3d Cir. 2009). This important decision set significant precedent regarding the scope of preemption under the Securities Litigation Uniform Standards Act of 1998 ("SLUSA"). In reversing the District Court's dismissal of the plaintiffs' claims, the Third Circuit held that "SLUSA does not mandate dismissal of an action in its entirety where the action includes only some pre-empted claims." In so holding, the court explained that "nothing in the language, legislative history, or relevant case law mandates the dismissal of an entire action that includes both claims that do not offend SLUSA's prohibition on state law securities class actions and claims that do . . . ."
- ***Tellabs, Inc. v. Makor Issues & Rights, Ltd.***, 551 U.S. 308 (2007). In *Tellabs*, in which Milberg LLP was lead counsel for the class, the United States Supreme Court

announced a uniform standard for evaluating the sufficiency of a complaint under the PSLRA. The court held that on a motion to dismiss, a court "must consider the complaint in its entirety," accepting "all factual allegations in the complaint as true," as well as "tak[ing] into account plausible opposing inferences." On remand, the Seventh Circuit concluded that "the plaintiffs have succeeded, with regard to the statements identified in our previous opinion as having been adequately alleged to be false and material, in pleading scienter in conformity with the requirements of the PSLRA. We therefore adhere to our decision to reverse the judgment of the district court dismissing the suit." The unanimous decision was written by Judge Richard A. Posner.

- ***South Ferry LP #2 v. Killinger***, 542 F.3d 776 (9th Cir. 2008). The important opinion issued by the Ninth Circuit in this securities fraud class action clarified, in the post-*Tellabs* environment, whether a theory of scienter based on the "core operations" inference satisfies the PSLRA's heightened pleading standard. In siding with the plaintiffs, represented by Milberg LLP, the Ninth Circuit held that "[a]llegations that rely on the core operations inference are among the allegations that may be considered in the complete PSLRA analysis." The court explained that under the "holistic" approach required by *Tellabs*, all allegations must be "read as a whole" in considering whether plaintiffs adequately plead scienter. After remand, the District Court found that the plaintiffs sufficiently alleged scienter under the Ninth Circuit's analysis.

MTPG's ATTORNEYS

MANAGING PARTNERS

ARIANA J. TADLER is a Managing Partner at Milberg Tadler Phillips Grossman LLP. She has extensive experience litigating and managing complex securities and consumer class actions, including high profile, fast-paced cases and data breach litigations. Ms. Tadler is recognized as one of the nation's preeminent leading authorities on electronic discovery and pioneered the establishment of an E-Discovery Practice group within a plaintiffs' firm structure. Ms. Tadler is regularly invited to speak on a variety of litigation and discovery-related topics and has authored numerous articles and developed and promoted best practice tips and tools, including *The Jumpstart Outline*, now in its third edition, published by The Sedona Conference®.

Ms. Tadler and her team have actively litigated numerous highly publicized data breach litigations on behalf of consumers and data service users. Ms. Tadler was recently appointed to serve on the Plaintiffs' Steering Committee in the multidistrict litigation *In Re Equifax, Inc. Customer Data Security Breach Litigation* pending in the United States District Court for the Northern District of Georgia, Atlanta Division, relating to the credit bureau's data breach last year, which exposed the financial information of more than 145 million consumers. Ms. Tadler and her team are principally responsible for the pursuit, management, and utilization of discovery from the defendant as well as the negotiation of key stipulations and proposed orders and agreements governing discovery.

Ms. Tadler is also a court-appointed member of the Plaintiffs' Executive Committee in *In re Yahoo Inc. Customer Data Security Breach Litigation*, No. 5:16-MD-02752 (N.D. Cal.), a class action arising from a breach affecting more than 3 billion Yahoo! user accounts. The firm's team, under Ms. Tadler's direction, is primarily responsible for the massive and complex discovery in the case.

Ms. Tadler is also a member of the court-appointed Steering Committee in *In re Target Corporation Customer Data Security Breach* Litigation, No. 14-md-2522 (D. Minn.), representing consumers in a class action alleging that Target Corp. failed to protect customers from a massive data breach during the holiday shopping season (achieved a $10 million settlement, pending appeal).

Ms. Tadler is also currently serving on the Plaintiffs' Executive Committee in the multidistrict litigation *In re Apple Inc. Device Performance Litigation,* No. 5:18-md-02827-EJD (N.D. Cal.). The *Apple* litigation arises from a December 2017 admission by Apple that it had released iOS updates designed to slow down the performance of certain iPhones and iPads. The case alleges that Apple throttled the performance of these devices to conceal problems with their batteries. Ms. Tadler serves as Co-Chair of the Offensive Discovery and ESI Coordination Committee.

Ms. Tadler is currently serving as lead counsel in a number of consumer cases involving the mislabeling as "natural" products that contained GMOs, including *In re ConAgra Foods, Inc.*, No. 11-05379 (M.D. Cal.) in which a class was certified by the district court, affirmed by the Court of Appeals for the Ninth Circuit and successfully survived a petition for a writ of *certiorari* to the United States Supreme Court by defendants.

Ms. Tadler has also successfully represented an alternative energy company in its claims of negligence against one of the Big 4 accounting firms.

Ms. Tadler has been recognized for her ability to manage particularly large, complex, fast-paced litigations. Tadler's accomplishments include litigation of three cases in the Eastern District of Virginia (a/k/a the "Rocket Docket") in less than four years, including *In re MicroStrategy*

Securities Litigation in which plaintiffs' counsel negotiated settlements valued at more than $150 million. Ms. Tadler served as one of the court-appointed plaintiffs' liaison counsel in the *Initial Public Offering Securities Litigation* in which the court approved a $586 million cash settlement. Among the thousands of defendants in this coordinated action were 55 prominent investment banks and more than 300 corporate issuers.

Ms. Tadler also has been retained as Special Discovery Counsel in complex litigation and class actions. She represented the government of Colombia as Special Discovery Counsel in its pursuit of claims alleging smuggling and illegal sales of alcohol by several international companies for violation of United States RICO statutes and other common law claims. The engagement encompassed identifying relevant information responsive to defendants' requests, confirming and guiding preservation practices, and interviewing and collecting data from more than 100 custodians in 23 Colombian Departments (Colombia's equivalent to our States in the U.S.). The team also reviewed and produced data in the litigation, and was tasked with ensuring compliance with the various privacy laws of Colombia and the United States with regard to personal data, controlled data and the transfer of sensitive information—all hot topics in the area of e-discovery today. Lawyers from other firms faced with e-discovery challenges seek out Ms. Tadler for her guidance and counsel.

Ms. Tadler was recently appointed by United States Supreme Court Chief Justice Roberts to serve on the Federal Civil Rules Advisory Committee. Additionally, she has been appointed by Committee Chair Judge John D. Bates to the subcommittee tasked with reviewing and considering potential civil rules for multidistrict litigation (MDL) cases.

Ms. Tadler recently completed her service on The Sedona Conference®'s Board of Directors and, after serving for five years as Chair, has continued to serve as Chair Emeritus of the Steering Committee for Working Group 1 on Electronic Document Retention and Production, the preeminent "think tank" on e-discovery. In addition, she serves on the Advisory Board of Georgetown University Law Center's Advanced e-discovery Institute where she has helped educate federal judges and lawyers on e-discovery issues and also serves on the Bloomberg Law Litigation Innovation Board. Ms. Tadler also recently completed her service as Executive Director for the Board of Advisors of the Benjamin N. Cardozo School of Law's Data Law Initiative (CDLI).

Ms. Tadler continues to be recognized for her litigation prowess by prominent legal industry rating organizations. Ms. Tadler's recent accolades include: Band 1 (highest) recognition by Chambers and Partners' for E-Discovery; selection by Super Lawyers 2017 "Top 100 Lawyers in New York Metro Area"; Super Lawyers 2017 "Top 50 Women Lawyers in New York Metro Area"; Who's Who Legal Litigation: Leading Practitioner-E-Discovery (2017); and AV® Preeminent rating from Martindale Hubbell. The Legal 500 2016 rankings stated: "'Consummate professional' Ariana Tadler, who leads the E-Discovery unit [of Milberg LLP], is 'exceptional, clear and forceful, a giant in her field' … 'able to navigate technical discovery issues at a very high level.'"

Ms. Tadler is a member of several legal industry associations, including: American Bar Association; American Bar Foundation (Fellow); American Association for Justice; Federal Bar Council; New York State Bar Association; National Association of Women Lawyers; New York Women's Bar Association; and The New York Inn of Court. Ms. Tadler is a fellow of the Litigation Counsel of America, an invitation-only trial lawyer honorary society that recognizes the country's top attorneys. She is also involved in various community and not-for-profit organizations and currently serves on the board of Mobilization for Justice for which she once served as Chair.

With gratitude for and in recognition of the many opportunities that have paved the way for her career growth and success, Ms. Tadler commits countless hours to mentoring others in their educational and professional pursuits. She is particularly focused on fostering education and career opportunities for women and underprivileged youth.

Ms. Tadler is also a Principal in Meta-e Discovery LLC, a data hosting, management and consulting company, which is the result of the 2015 spin-off of Milberg LLP's prior Litigation Support and Data Hosting services division that Ms. Tadler spearheaded.

Ms. Tadler graduated from Hamilton College in 1989 and received her J.D. from Fordham University School of Law in 1992.

R. GLENN PHILLIPS has been practicing since 1984 and has tried more than 100 civil jury trials. He is a Managing Partner at Milberg Tadler Phillips Grossman LLP and also owns Phillips Law Firm, which operates in Washington, California, and nationally handling serious personal injury, product liability, workman's compensation, social security disability, medical malpractice, defective drug/device, and employee rights cases.

Mr. Phillips has received the highest rating from Martindale-Hubbell (5.0 out of 5.0) and is an AV rated attorney.

Mr. Phillips and the Phillips Law Firm are recognized as leaders in pharmaceutical litigation and have been appointed to positions of leadership on various steering committees, science/ discovery committees and JCCPs. Mr. Phillips is actively involved in his firm's defective drug and devices practice. His mass tort practice has an inventory of over 4,000 cases, covering such products as Accutane, Yaz/Yasmin/Ocella, Fosamax, Avandia, Medtronic Infuse, GranuFlo, Mirena, Risperdal, Onglyza, Talcum Powder, and defective devices such as transvaginal mesh, shoulder pain pumps, and DePuy hip implants.

Mr. Phillips is a member of the Washington state bar. He is also a member of the American Association of Justice, an Eagle member of the Washington Association for Justice, and the non-profit organization of Public Justice, and a frequent speaker before such national groups as the National Trial Lawyers, American Association for Justice, Mass Torts Made Perfect, as well as various state trial lawyer groups.

MARC D. GROSSMAN graduated from The University of Michigan in 1989. After completing Brooklyn Law School and Baruch Business School's J.D./M.B.A. program while interning at the Law Department of the United Nations, Mr. Grossman became an associate and later a partner in the law firm of Mergel, Tubman & Grossman in New York City. In addition to his role as a Managing Partner at Milberg Tadler Phillips Grossman LLP, Mr. Grossman is a Founding Partner of Sanders and Grossman P.C. and Baker Sanders Barshay Grossman Fass Muhlstock & Neuwirth, LLC, and a Senior Partner at Sanders, Sanders, Block, Woycik, Viener & Grossman, P.C. and Sanders Viener Grossman LLP.

Since beginning his law career in 1993, Mr. Grossman has focused primarily on representing large groups of plaintiffs against common defendants. In 1999, after six years of practicing plaintiff's personal injury law in state and federal courts in New York and New Jersey, Mr. Grossman founded the law firm of Sanders and Grossman, P.C. specifically to pursue claims on behalf of medical providers. This firm, and its successors, grew dramatically under his leadership, and now represent thousands of medical providers litigating claims against insurance companies, and thousands of injury victims.

Mr. Grossman had a vision of uniting the medical profession by affording them the opportunity to litigate nominal claims that were being written off by medical providers as uncollectible and had not previously been

practical for most attorneys to litigate. By coordinating discovery, utilizing the most up-to-date case management technology, and recruiting top office administrators and trial attorneys, Mr. Grossman's firm was able to greatly improve efficiencies throughout the litigation process and ultimately the viability of collecting these claims. By filing over 100,000 individual lawsuits, Mr. Grossman's firms garnered the attention of the insurance industry and the medical profession in New York eventually leading to a series of mass settlements on behalf of his clients and recoveries in the hundreds of millions of dollars. In just 2006 and 2007, Mr. Grossman's firm personally litigated, negotiated, and recovered over 100 million dollars for his medical provider clients. The unique experience Mr. Grossman garnered as an innovator and leader in the mass settlement of medical claims and mass torts made him a leader in his field in negotiating and obtaining large recoveries.

Most recently, Mr. Grossman has represented hundreds of injured clients in lead paint litigations, asbestos litigations, mold litigations, and thousands of victims of defective drugs and products. Mr. Grossman received recognition litigating Vioxx cases in New Jersey Superior Court where he served as a liaison to the media as a member of the Vioxx Plaintiffs' Steering Committee's ("PSC's") Public Relations Committee, and as a liaison for the Committee to many financial institutions and governmental agencies, offering a common voice for the hundreds of attorneys handling such cases and the tens of thousands of victims they represent. These efforts and the hard work of many other relentless attorneys ultimately led Merck to agree to one of the largest Civil Settlements in American History for $4.85 Billion.

In December 2010, Mr. Grossman was nominated and invited to join both The Board of Directors of the New York State Trial Lawyers Association and the Executive Committee of Association of Trial Lawyers of America. Mr. Grossman is also a member of the Mass Tort Trial Lawyers Association and the Leaders Forum of the American Association of Justice.

Mr. Grossman has actively litigated for other large groups of plaintiffs in the following matters: *In re Avandia Marketing, Sales Practices and Products Liability Litigation*; *In re New York Bextra and Celebrex Product Liability Litigation* in New York's Supreme Court, New York County; Case No. 273, *In re Bextra and Celebrex Litigation*, Superior Court of New Jersey, Atlantic County; Oxycontin Litigation in New York's Supreme Court, Richmond County; MDL-1708, *In re Guidant Corp. Implantable Defibrillators Products Liability Litigation* in Minnesota; MDL-1699, *In re Bextra and Celebrex Marketing, Sales Practices and Products Liability Litigation* in California; MDL-1742, *In Re Ortho Evra Products Liability Litigation* in Ohio; MDL-1789, *In re Fosamax Products Liability Litigation* in New York; and MDL-1804, *In Re Stand 'N Seal, Products Liability Litigation*, where one of Mr. Grossman's firms serves on the PSC. One of Mr. Grossman's firms is also a court-appointed member of the PSC in the following mass tort litigations: *In Re Avandia, In Re Chantix, In Re Zicam, In Re Zimmer Knee, In Re Fosamax*, and the New Jersey state court coordination of *Levaquin*. One of Mr. Grossman's firms is co-lead in the NY Chantix Coordination and the New Jersey Reglan Coordination, as well as Risperdal in California, all Transvaginal Mesh PSC, and Propecia coordination.

After an $8 million verdict in *Boles v. Merck* for a victim of Fosamax, Mr. Grossman, along with co-counsel, led the Trial Team in *Rosenberg v. Merck* which was the first bellwether New Jersey Trial in Atlantic County Superior Court.

Mr. Grossman has become well known as a speaker and host of approximately 20 educational seminars designed to educate victims, the medical community, and other attorneys. Mr. Grossman has been quoted and has appeared in numerous local and national

forums and in the media as a legal commentator and advocate of victims rights against the corporate greed that plagues our nation.

In January 2016, Mr. Grossman received the 2015 Litigator Award a significant distinction, achieved by less than 1% of all trial attorneys. This award is considered among the top honors bestowed on trial attorneys.

PEGGY J. WEDGWORTH is a managing partner and Chair of the Antitrust Practice Group. She was an Assistant District Attorney in Brooklyn, New York from 1986 to 1989. Since leaving the public sector in 1989, she has handled numerous securities, commodities, antitrust and whistleblower matters, and is a Super Lawyer in New York, New York since 2016 and recommended in the Legal 500 United States for 2016.

Ms. Wedgworth represents defrauded investors and consumers, and she currently represents consumers in *In re Contact Lens Antitrust Litigation*, and car dealerships in an antitrust action brought against software suppliers. She actively litigated *In re Initial Public Offering Securities Litigation* for over five years, which settled for $586 million, and *In re Merck & Co. Securities Litigation*, which had a combined settlement totaling $1.062 billion. She also won a jury trial against R.J. Reynolds in a wrongful death tobacco case in Florida state court.

Ms. Wedgworth has litigated antitrust and commodities class actions on behalf of plaintiffs including extensive experience in all aspects of pre-trial discovery in, among other cases, *In re Brand Name Prescription Drugs Antitrust Litigation*, No. 94-897, 1996 WL 351180 (N.D. Ill. June 24, 1996) (approving $351 million settlement); *In re NASDAQ Market-Makers Antitrust Litigation*, 187 F.R.D. 465 (S.D.N.Y.) ($1,027,000,000 settlement); *In re Microsoft Litigation*, MDL 1332 (D. Md.) (consolidated class actions alleging long term unlawful maintenance of a monopoly and other anticompetitive conduct by Microsoft resulting favorable partial settlements); *In re Soybean Futures Litigation*, No. 89-7009 (N.D. Ill.) ($21,500,000 class settlement providing claiming class members/soybean futures traders a full recovery under plaintiffs' expert's formula); *In re Sumitomo Copper Litigation*, 74 F. Supp. 2d 393, 395 (S.D.N.Y. 1999) ("The recovery is the largest class action recovery in the 75 plus year history of the Commodity Exchange Act."); *Kohen v. Pacific Investment Management Company, LLC*, No. 05-4681 (N.D. Ill.) (certified class of treasury bond futures purchasers alleging manipulation of the futures market); *Leider v. Ralfe*, No. 01-3137 (D.N.J.) (alleging price-fixing and monopolization in the diamond market by DeBeers resulting in a settlement of $250,000,000 and extensive injunctive relief); and *In re Natural Gas Commodities Litigation*, 03-6186 (S.D.N.Y.) ($101 million settlement).

Ms. Wedgworth regularly speaks on topics relating to antitrust litigation, multi-district litigation and class action issues, and consumer matters. She is a member of the New York State Bar Association's Antitrust Committee, where she has served as both a speaker and panelist, and the American Bar Association, Antitrust Committee, and a member of the American Association of Justice.

PARTNERS

DAVID AZAR received his B.S. in Finance from Indiana University School of Business in 1991. He graduated from Duke University School of Law, *magna cum laude*, in 1999, where he was a member of the Order of the Coif (top 10% of the class). While in law school, he served as a senior editor of *Law and Contemporary Problems*, and was a member of the Moot Court Board. After law school, he clerked for Chief Justice Veasey of the Delaware Supreme Court.

Mr. Azar focuses his practice on class actions on behalf of defrauded investors and consumers, as well as disputes regarding contracts, partnerships, closely-held corporations, corporate governance, and other complex commercial matters for businesses and individuals. He also provides corporate counseling in pre-litigation and transactional matters, working with transactional or specialty counsel to provide a litigation perspective or to act as an outside general counsel.

Building upon his nine years of experience representing business enterprises and high-net-worth individuals at two of the most prominent business litigation firms, Mr. Azar has prosecuted several multiparty and other class actions that resulted in more than $300 million in settlements during the past few years alone. Recent significant settlements include obtaining total recovery for investors of $219 million against Bank of New York Mellon and Wells Fargo in a securities fraud/breach of contract action, which reflected one of the largest recoveries against indenture trustees in United States history. In addition, Mr. Azar was part of the team that served as co-lead counsel in a class action resulting in $86 million in settlements on behalf of airline passengers who alleged that Korean Air Lines and Asiana Airlines conspired to fix the price of air travel between the United States and Korea. Mr. Azar's significant litigation experience includes first-chair trial and appellate work. He is co-author of the chapters on LLC and partnership disputes in *Litigating and Judging California Business Entity Governance Disputes*, scheduled to be published by Lexis in 2019. He is also a contributing author of *Antitrust Law Developments* (7th Edition), published by the ABA Section of Antitrust Law. Mr. Azar is also a co-founding president and board member of the California Discovery Law Initiative, a non-profit that is reviving a publicly accessible and free-to-use website regarding California discovery law practice and case law.

Mr. Azar serves as a volunteer prosecutor through the Los Angeles Bar Association's Trial Advocacy Project, and he has been named by *Los Angeles Magazine* as a Southern California Super Lawyers Rising Star. Mr. Azar has extensive knowledge of dispute resolution, having served as a mediator in more than 160 cases, and he has trained and reviewed other mediators. He served for five years as the editor of the quarterly publication of the Society of Professionals in Dispute Resolution, and was honored with the association's Presidential Recognition award.

KENT A. BRONSON received a B.A. from State University of New York at Binghamton in 1994. He graduated *cum laude* from University of Pittsburgh School of Law in 1998. During law school, Mr. Bronson was a research editor on the Law Review and a recipient of the Dean's Scholarship.

Mr. Bronson's practice is focused on securities, consumer and class action litigation. Prior to joining Milberg LLP, while associated with another law firm, Mr. Bronson was part of a team of attorneys representing New York homeowners in *In re Coordinated Title Insurance Litigation*, Index No. 009600/2003 (N.Y. Sup. Ct. Nassau Cnty.) who alleged that eight insurance companies doing business in New York state overcharged them for title insurance in refinance transactions. The

litigation resulted in complete recovery to homeowners submitting valid claims, and reportedly the largest settlement of a consumer class action in Nassau County. The presiding Justice, in approving the $31.5 million settlement of that litigation, described the prosecution of the case as reflecting "lawyering of the highest quality." Also, in *In re Providian Financial Securities Litigation*, MDL 1301 (E.D. Pa.), Mr. Bronson was one of the attorneys representing the Xerox (GB) Pension Scheme (which reportedly oversees approximately $2.5 billion in employee retirement funds for the British affiliate of Xerox Corp.) in a securities fraud class action lawsuit alleging that a major credit card company inflated its profits with illegal charges to consumers. The Court commented, in approving the $38 million settlement of that case, on the "extremely high quality" and "skill and efficiency" of plaintiffs' counsel's work.

Mr. Bronson has litigated numerous complex class action and shareholder derivative cases in various state and federal courts, including, among others, *In re Biovail Corp. Securities Litigation*, No. 03-8917 (S.D.N.Y.) (in which Milberg LLP served as co-lead counsel on behalf of the Local 282 Welfare Trust Fund, and which was settled for $138 million and certain corporate governance modifications); *City of Miami Police Relief & Pension Fund v. Ryland Group, Inc.*, No. BC411143 (Cal. Super. Ct. Los Angeles Cnty.); *New Jersey Carpenters Annuity Fund v. Meridian Diversified Fund Management, LLC*, No. 10-5738 (S.D.N.Y.); *New Jersey Carpenters Pension Fund v. infoGroup, Inc.*, No. 5334-VCN (Del. Ch.); and *In re Massey Energy Co. Derivative & Class Action Litigation*, No. 5430-VCS (Del. Ch.).

During law school, Mr. Bronson was a research editor of the University of Pittsburgh Law Review and a recipient of the University of Pittsburgh School of Law Dean's Scholarship.

Mr. Bronson is admitted to practice in New York State courts, the United States District Courts for the Southern, Eastern and Northern Districts of New York, and the United States Courts of Appeals for the Second and Tenth Circuits.

MELISSA RYAN CLARK has spent more than a decade litigating complex and class action privacy, financial, and consumer cases.

She has a broad range of class action experience, having represented consumers in data privacy, data breach, and consumer fraud cases against data and tech giants like Facebook, Inc., Google, Apple, Inc., Equifax Inc., and RCN Corp., as well as corporations in other industries, such as Wendy's International, LLC. Ms. Clark also has a strong background in securities fraud litigation and has represented investors in class actions against publicly traded companies like ARIAD Pharmaceuticals, Inc.

In addition to her class action work, Ms. Clark has also litigated complex, commercial cases. She currently represents municipalities in Fair Housing Act litigation against large financial institutions, including Bank of America, HSBC, and Wells Fargo. She has also successfully represented a formerly public company in an accounting negligence case against PricewaterhouseCoopers and an investment fund in an action against Fidelity National Title Insurance Company.

Ms. Clark is also a member of MTPG's E-Discovery Practice Group and is frequently responsible for spearheading discovery and ESI negotiations in complex cases.

Previously, Ms. Clark worked at a boutique firm in New York, where she was part of a securities litigation team that recovered several multimillion-dollar settlements on behalf of investors. Her legal work experience also includes judicial externships with the Honorable Jerry Brown, Chief Judge of the United States Bankruptcy Court, Eastern District of Louisiana and the Honorable Jay C.

Zainey of the United States District Court, Eastern District of Louisiana, as well as a clerkship for the San Francisco District Attorney's Office.

In addition to her legal work, Ms. Clark has experience teaching legal research, writing, and management communication skills as a Senior Fellow at Tulane Law School and an Adjunct Writing Instructor at Tulane University's Freeman School of Business.

She is an active member of the New York State Bar Association, where she serves on the Law, Youth & Citizenship Committee and Mock Trial subcommittee, and the American Bar Association, where she serves on the Professional Liability Committee as co-editor of the newsletter.

Ms. Clark received her B.S. from Florida State University in 2004 and her J.D. from Tulane University in 2007. She also attended UC Berkeley-Boalt Hall for a semester, where she received high honors in Securities & Class Action Litigation and was a member of the *California Law Review*.

Ms. Clark is admitted to practice in the state of New York, the United States District Courts for the Southern, Eastern, and Western Districts of New York, and the United States Court of Appeals for the First Circuit. She has been recognized as a New York Super Lawyers "Rising Star" each year from 2011-2018 and was named to the Benchmark Litigation 40 & Under Hot List in 2018.

A.J. DE BARTOLOMEO joined the MTPG Consumer Litigation and Securities Litigation Practice Groups in June 2018. She brings with her nearly 30 years of experience prosecuting class actions and complex matters in courts throughout the United States. With extensive practice litigating mass personal injury matters involving defective drugs and medical devices, Ms. de Bartolomeo has served in court-appointed leadership roles in numerous MDL mass tort and class action lawsuits.

She served on the Plaintiffs' Steering Committees for *In re Yaz and Yasmin Birth Control Litigation*, *In re Actos Products Liability Litigation*, and *In re Pradaxa Products Liability Litigation*. Ms. de Bartolomeo has also served on Law and Briefing committees and has been involved with Daubert briefings in a number of cases, including *Yaz*, *Actos* and *Pradaxa*. She previously served on the Plaintiff's Steering Committee for *In re Transvaginal Mesh Litigation*. She also served as Co-Lead Counsel representing over 300 individuals (including minors) who used the Fitbit Force™ Wireless Activity + Sleep Wristband and suffered personal injuries and permanent scarring, achieving a 2017 settlement in aggregate matrix formula for a confidential amount.

In class action matters, she received Co-Lead position appointments in *In re Literary Works in Electronic Database Copyright Litigation*, MDL No. 1379 (S.D.N.Y.), *In re Motors Liquidation Company, et al., f/k/a General Motors Corp., et al.* (Bankruptcy Litigation) (S.D.N.Y.), *In re American Express Financial Advisors Securities Litigation* (S.D.N.Y.), and *CalSTRS v. Qwest Communications, et al.*(N.D. Cal.). She was appointed lead counsel in *Powers v. Cable & Wireless, Inc.* (D. Mass and then settled in Delaware Bankruptcy Court.) and *Telstar v. MCI, Inc.*, achieving a settlement of more than $2.8 million in cash on behalf of class of commercial subscribers alleging FCA violations for unfair billing practices. Ms. de Bartolomeo currently serves on the Plaintiffs' Steering Committee in *In Re Avandia Marketing, Sales Practices and Products Liability Litigation*, MDL 1871.

Ms. de Bartolomeo is in the forefront of advancing opportunities for women in the law. A former Chair of the Women's Trial Lawyer Caucus of the American Association of Justice, she oversaw the caucus's work in leadership training, student scholarship, membership and political outreach, and other pro-civil justice

functions. She is an active member of the American Bar Association Sections on Tort Trial and Insurance Practice, the American Bankruptcy Institute and of the Consumer Attorneys of California.

Ms. de Bartolomeo has been ranked among the highest classes of attorneys for professional ethics and legal skills with an AV-Preeminent rating by Martindale Hubbell. She has also been recognized by her peers as a Northern California Super Lawyer every year since 2013.

Other awards and recognition include the Above and Beyond Award, American Association for Justice, 2018; Top 50 Women Lawyers in Northern California, 2017; Distinguished Service Award, American Association for Justice, 2016; and Top Women Attorneys in Northern California for 2014.

A frequent guest speaker and conference presenter, Ms. de Bartolomeo has addressed subjects of ethical procedures for client and case management, best settlement practices and procedures in complex litigation, pharmaceutical fraud, Daubert challenges, Fed. R. Civ. Pro. 37(e), corporate litigation risk management and compliance procedures, and class action notice and settlement administration.

Past and present memberships and directorships include Member, American Bar Association; Member of ABA Sections on Litigation, and on Antitrust Law and Tort and Insurance Practice; Member, American Association for Justice; Member of the AAJ Executive Committee (2016-Present); Board of Governor (2016-Present); Executive Committee Member for Women's Trial Lawyer Caucus (2016-Present); Chair of Women's Trial Lawyer Caucus (2015-2016); Former Member, National Association of Public Pension Attorneys, Task Force on Securities Litigation and Damage Calculation; Former Member, American Bankruptcy Institute.

ANNA C. DOVER received a B.A. degree from Wesleyan University, with honors in Psychology, in 1995, and a J.D. degree from the University of California at Davis School of Law in 2001. While in law school, Ms. Dover was a member of the *UC Davis Law Review*.

Ms. Dover joined Milberg LLP in 2005 and spent several years litigating a variety of cases, including securities, antitrust, bankruptcy, and mutual fund fraud cases. During this time, Ms. Dover developed particular experience litigating claims brought under Section 36(b) of the Investment Company Act of 1940, including taking such cases to trial and also second-chaired a bench trial in bankruptcy court. Ms. Dover ultimately found her calling as an attorney who represents whistleblowers and is now the chair of MTPG's false claims act or "*qui tam*" department. Her practice encompasses lawsuits brought by whistleblowers or "relators" on behalf of the government under the federal and state false claims acts, largely in the health care arena. Recent settlements include a $54 million settlement in an intervened case against CareCore, a company that failed to ensure that the government healthcare programs paid only for those diagnostic tests that were medically reasonable or necessary. The relator was awarded a $10.5 million share of the settlement. Another recent settlement was in a false claims act lawsuit that exposed the fraudulent submission of Medicare and Medicaid healthcare claims by Careall, one of Tennessee's largest home healthcare providers. The Government intervened in the whistleblower's lawsuit and the case settled for $25 million. The whistleblower Milberg LLP represented received a $3.9 million share of the settlement.

In addition to her work at MTPG, Ms. Dover is also a longstanding member of the New York Inn of Court and has spoken at several of its CLE seminars over the years. Ms. Dover is fluent in French and conversational in Greek.

Prior to joining Milberg LLP, Ms. Dover litigated legal malpractice and insurance cases at a boutique firm of trial lawyers in Los Angeles.

Ms. Dover is admitted to practice before the United States District Courts for the Southern District of New York and the Central and Southern Districts of California, the United States Court of Appeals for the Fourth and Ninth Circuits, and the United States Supreme Court.

HENRY KELSTON received a B.S. degree, *cum laude*, from Tufts University in 1975, and a J.D. degree from New York University School of Law in 1978, where he was a member of the *Annual Survey of American Law*.

Mr. Kelston's practice is concentrated in the areas of complex litigation, class actions and electronic discovery. Mr. Kelston has represented consumers in class actions against major food manufacturers challenging the use of "natural" claims on products containing GMOs. He has also litigated major data breach cases, including *In re Yahoo! Inc. Customer Data Security Breach Litigation*, concerning the largest consumer data breach in history.

Mr. Kelston has extensive experience in state and federal court litigation, administrative proceedings, and arbitrations, and is a regular speaker and CLE presenter on electronic discovery. He is a member of The Sedona Conference® Working Group 1 on Electronic Document Retention and Production. Most recently, he assisted in drafting The Sedona Conference® COMMENTARY ON LEGAL HOLDS: THE TRIGGER & THE PROCESS (expected publication in 2019), and served on the faculty for The Sedona Conference® E-DISCOVERY NEGOTIATION TRAINING. Mr. Kelston also taught Basics of E-Discovery at Legal Services of New Jersey's 2018 In Depth Litigation Skills Training program.

Mr. Kelston is admitted in the United States District Courts for the Southern and Eastern Districts of New York and the District of Connecticut.

MATTHEW A. KUPILLAS graduated from the State University of New York at Albany in 1990 with a B.A. degree in philosophy. In 1994, Mr. Kupillas received his J.D. degree from New York University School of Law. Mr. Kupillas focuses his practice primarily on class actions on behalf of defrauded investors and consumers, as well as complex commercial litigation.

Mr. Kupillas' securities practice has included numerous complex litigations nationwide, including *In re Merck & Co., Inc. Securities Litigation*, which resulted in a $1.062 billion recovery on behalf of injured investors; *In re Medical Capital Securities Litigation*; and *South Ferry LP #2 v. Killinger*.

Mr. Kupillas is a member of the bar of the State of New York and is admitted to practice before the United States District Court for the Southern and Eastern Districts of New York, the District of Colorado, the Eastern District of Wisconsin, and the United States Courts of Appeals for the Second and Tenth Circuits.

ELIZABETH MCKENNA is a Partner with MTPG and has spent almost 20 years as a litigator. She currently focuses her practice on complex and class action consumer protection and privacy cases, as well as antitrust cases involving price-fixing, unlawful monopolization, and other anticompetitive practices. Ms. McKenna also represents defrauded individuals and institutional investors in class and other representative actions involving complex financial issues.

Ms. McKenna was part of the team appointed co-lead counsel for Indirect Purchaser Plaintiffs in *in re Fresh & Process Potatoes Antitrust Litig.*, No. 4:10-md-2186 (D. Idaho), as well as *In re Processed Egg Products Antitrust Litig.*, No. 2:08-md-2002 (E.D. Pa.).

Prior to joining Milberg LLP, Ms. McKenna worked as an attorney in the New York office

of Healy & Baillie, LLP (now part of Blank Rome LLP), where she practiced commercial litigation, as well as admiralty and maritime law.

Ms. McKenna graduated from Columbia University in 1991 with a B.A. degree in English, and a J.D. degree from Fordham Law School in 1998. While at Fordham, Ms. McKenna was a Stein Scholar in Public Interest Law & Ethics, a member of the Fordham Environmental Law Journal, and a Co-Director of the Fordham Student Sponsored Fellowship.

Ms. McKenna is admitted to practice in the state courts of New York and in the United States District Courts for the Southern and Eastern Districts of New York.

ANDREI RADO focuses his practice on securities litigation, consumer class actions, and SEC whistleblower matters.

Since the passage of the Dodd-Frank Act in 2010, Mr. Rado has represented numerous whistleblowers before the commission under a program that rewards and protects whistleblowers that report violations of securities laws to the Securities and Exchange Commission. These involved a variety of complaints, including allegations of bribing foreign officials to gain business, accounting fraud, and consumer fraud, against a variety of companies diverse in size and business.

Mr. Rado's securities practice has included numerous complex litigations nationwide, including *In re Initial Public Offering Securities Litigation*, which alleged, in hundreds of consolidated cases then pending in the Southern District of New York, that investment banks manipulated the initial public offerings of hundreds of companies, and mutual fund timing cases alleging that mutual fund managers allowed select investors to profit by improperly timing their trading in fund shares.

Mr. Rado also investigates, launches, and litigates consumer class actions. These cases are as diverse as consumer fraud itself. Early in his career, Mr. Rado litigated a case against jewelry company Zales for improperly denying credit-insurance claims made by unemployed and retired consumers, and a class action against computer maker Gateway for improperly understating in advertising the costs of internet access to consumers, some of whom incurred internet-access fees of hundreds of dollars. More recently, among other cases, Mr. Rado has launched and litigated consumer cases against companies that misled consumers by inflating the technical specifications of their products, and "all natural" food cases, including the first case alleging that products made from genetically modified organisms (GMOs) should not be advertised as natural.

Mr. Rado is editor of MTPG's consumer blog classactioncentral.com

Prior to joining Milberg LLP, Mr. Rado worked as an attorney at a New York City-based investment bank focusing on compliance, with rules and regulations relating to re-sales of control and restricted securities under the Securities Act of 1933. Mr. Rado also worked at another prominent New York City law firm specializing in plaintiffs' securities class action litigation.

Mr. Rado received his Juris Doctor degree from St. John's University School of Law, *cum laude*, in 1999. While in law school, Mr. Rado served as a senior member of the *New York International Law Review*. He is admitted to practice in the courts of the State of New York, as well as the United States District Court for the Southern District of New York. Mr. Rado was born in Bucharest Romania, and lived in Israel for several years before immigrating to New York in the early 80s.

CHRISTIAN SIEBOTT has over 15 years' experience successfully representing plaintiffs in complex commercial, securities fraud, antitrust, trademark and copyright, landlord/tenant and whistleblower litigation. He works in the firm's consumer, antitrust, securities, false claims and appellant advocacy litigation practice areas.

Mr. Siebott has participated in several noteworthy cases over his career, including one of the largest securities class actions ever litigated, *In re Initial Public Offering Securities Litigation*, which recovered $586 million on behalf of investors. He also litigated Public Employees Retirement Association of *New Mexico v. Clearland Securities et al.,* which recovered $50 million for New Mexico's public employee pension fund.

Mr. Siebott has had significant appellate experience in state and federal appellate courts and the United States Supreme Court, and authored and edited portions of the New York City Bar Association's Appeals to the Second Circuit. In *Roberts v. Tishman Speyer Properties, L.P.*, he obtained a landmark ruling from New York's highest court on behalf of a class of tenants from New York City's largest residential apartment complex, overturning a state regulation and holding that the plaintiffs' landlords were not permitted to deregulate rent stabilized apartments while simultaneously receiving New York City tax abatements. Mr. Siebott has used *Roberts* to prosecute numerous other cases of landlord abuse including *Altschuler v. Jobman*, winning triple damages for the plaintiff.

Mr. Siebott is admitted to the Bar of the State of New York and to practice before the United States Supreme Court, the United States Courts of Appeals for the Federal, Second, Third, Fourth, Eighth, Ninth, and Eleventh Circuits, the United States Court of Appeals for the Armed Forces, the United States Court of Appeals for Veterans Claims, and the United States District Courts for the Southern and Eastern Districts of New York. He is active in the New York City Bar Association and the Federal Bar Council.

Mr. Siebott graduated from Penn State in 1991 and received his J.D. from City College of the City University of New York, where he won the Belle Zeller Scholarship recognizing socially committed scholars. Mr. Siebott is now committed to pro bono practice; he represents veterans in disability and pension benefit proceedings and has represented the families of uniformed rescuers before the 9/11 Victims Compensation Board.

ROBERT A. WALLNER received his B.A. degree from the University of Pennsylvania in 1976 graduating *magna cum laude*. He attended New York University School of Law, earning his J.D. degree in 1979. He was elected to the law school's Order of the Coif and served as an editor of the *New York University Law Review*.

Mr. Wallner has litigated complex securities, consumer and antitrust class actions throughout the country. He has represented plaintiffs in lawsuits arising out of the Madoff Ponzi scheme, including the court-appointed litigation trustee of two Madoff "feeder funds." He has also represented investors in *In re Merck & Co., Inc. Securities Litigation* (D.N.J.), which resulted in a $1.062 billion recovery, *In re Initial Public Offering Securities Litigation* (S.D.N.Y), *In re CMS Energy Corporation Securities Litigation* (E.D. Mich.), and *In re Deutsche Telekom AG Securities Litigation* (S.D.N.Y.), and consumers in *In re Synthroid Marketing Litigation* (N.D. Ill.) and the *Mercedes-Benz Tire Litigation* (D.N.J.).

Mr. Wallner is a frequent lecturer on securities and complex litigation issues. He has served on the editorial board of *Securities Litigation Report*, as a faculty member of the American Bar Association's First Annual National Institute on Securities Litigation and Arbitration, and as a member of the Federal Courts Committee of the Association of the Bar of the City of New York. He has been recognized in Lawdragon's "100 Lawyers You Need to Know in Securities Litigation."

OF COUNSEL

PAUL J. ANDREJKOVICS graduated from Union College, Schenectady, NY, in 1992, *Phi Beta Kappa*, *magna cum laude*, with a B.A. degree in political science. In 1995, Mr. Andrejkovics received his J.D. degree from Albany Law School.

Mr. Andrejkovics's practice concentrates on class action settlements and settlement administration. He was admitted as a member of the New York bar in 1996 and is admitted to practice before the United States District Court for the Northern, Southern, and Eastern Districts of New York.

SANFORD P. DUMAIN attended Columbia University where he received his B.A. degree in 1978. He graduated *cum laude* from Benjamin N. Cardozo School of Law of Yeshiva University in 1981.

Mr. Dumain represents plaintiffs in cases involving securities fraud, consumer fraud, insurance fraud, and violations of the antitrust laws.

Mr. Dumain was co-lead counsel in *In re Tyco International Ltd., Securities Litigation* in which $3.2 billion was recovered for investors. Mr. Dumain also served as lead counsel in the securities class actions against Nortel and Biovail, which are the highest and third highest recoveries ever in cases involving Canadian companies. The *Nortel* settlement was valued at over $1 billion and *Biovail* settled for over $138 million in cash. Mr. Dumain successfully represented the City of San Jose, California against 13 of the City's broker-dealers and its outside accountants in connection with major losses in unauthorized bond trading.

Mr. Dumain began his career as a law clerk to Judge Warren W. Eginton, United States District Court for the District of Connecticut 1981-1982. During the early years of his practice, he also served as an Adjunct Instructor in Legal Writing and Moot Court at Benjamin N. Cardozo School of Law.

Mr. Dumain has lectured for ALI-CLE concerning accountants' liability and has prosecuted several actions against accounting firms.

Judge Janet C. Hall of the District of Connecticut made the following comment in *In re Fine Host Corporation Securities Litigation* No. 97-2619 (D.Conn.): "The court also finds that the plaintiff class received excellent counseling, particularly from the Chair of the Plaintiffs' Executive Committee, Attorney Dumain."

Mr. Dumain is admitted to practice in the State of New York, United States District Court for the Southern, Eastern, and Western Districts of New York, District of Colorado, and District of Connecticut, and United States Courts of Appeals for the First, Second, Third, Sixth, Seventh, and Eighth Circuits.

MICHAEL C. SPENCER graduated from Yale University in 1973 with a B.A. degree, *magna cum laude*, with distinction, in philosophy. While at Yale, he was elected to Phi Beta Kappa. Mr. Spencer received a J.D. degree from Harvard Law School, *cum laude*, in 1976.

Mr. Spencer has prosecuted a broad range of cases at Milberg LLP and MTPG, with an emphasis on representing plaintiffs in class and other representative actions involving complex financial issues.

He was one of the principal trial counsel for plaintiffs in *In re Vivendi Universal, S.A. Securities Litigation* (S.D.N.Y.), a securities fraud class action in which the jury returned a verdict for the plaintiffs in January 2010. He is presently handling post-trial motions and defendant's anticipated appeal. The case is notable for the size of the verdict and for inclusion of investors from France, England, and the Netherlands, as well as the United States, in the certified class.

Mr. Spencer has handled many other securities cases at the Firm, including those

against defendants in the fields of technology, real estate, finance, leasing, manufacturing, and pharmaceuticals. His first exposure to this type of case was in the precedent-setting "*WPPSS*" litigation in the late 1980s, which involved bond defaults on nuclear power plants in the Pacific Northwest and established the blueprint for prosecuting many complex securities class actions that followed.

Mr. Spencer has also led the Firm's prosecution of other cases in diverse fields. He was one of two principal trial counsel representing the FDIC in its year-long trial against a major accounting firm involving failed-bank audits, which led to a global settlement covering all government claims just before closing arguments to the jury. He has prosecuted consumer and securities claims against companies that sold deferred annuities unsuitable for retirement plan investors. He has taken appraisal and breach of fiduciary duty cases to trial in Delaware and Pennsylvania. He had extensive involvement in representing a coalition of union health care funds seeking to recover costs for treating smoking-related illnesses from the tobacco industry, pursuing the cases through several appeals. He has also represented plaintiffs in cases involving accounting malpractice, limited partnership investments, real estate closing fees and mortgage insurance, contract disputes, defamation, unlawful lotteries, and consumer deception.

Mr. Spencer began his legal career as a law clerk to U.S. District Judge Wm. Matthew Byrne Jr. in Los Angeles (1976-77). He then returned to New York and joined Cravath, Swaine & Moore as an associate, where he worked until 1986, when he joined Milberg LLP as an associate and became a partner later that year. Mr. Spencer graduated from Yale University in 1973 with a B.A. degree, magna cum laude, with distinction, in philosophy. While at Yale, he was elected to Phi Beta Kappa. Mr. Spencer received a J.D. degree from Harvard Law School, cum laude, in 1976.

BARRY A. WEPRIN graduated from Harvard College in 1974. He received a J.D. degree from the New York University School of Law in 1978, and a master of public affairs from the Woodrow Wilson School of Princeton University in 1978. While in law school, Mr. Weprin was notes and comments editor of the *New York University Law Review*.

Since joining the firm, Mr. Weprin has specialized in securities and insurance litigation. He has served as lead or co-lead counsel in a number of complex securities class action litigations. He was one of the principal attorneys in the sales practice litigations against The New York Life Insurance Company, The New England Life Insurance Service Company, The Massachusetts Mutual Life Insurance Company, The John Hancock Mutual Life Insurance Company, and The Prudential Life Insurance Company which recovered billions of dollars for policyholders. Mr. Weprin is a frequent lecturer on complex litigation issues.

Previously, Mr. Weprin served as law clerk to Judge Charles P. Sifton of the United States District Court for the Eastern District of New York and was associated with the law firm of Wachtell Lipton Rosen & Katz where he specialized in commercial and securities litigation. He also served as general counsel to the New York State Housing Finance Agency and the New York State Medical Care Facilities Finance Agency, two agencies that issue tax exempt bonds for financing nonprofit medical facilities and qualified housing projects.

Mr. Weprin is very active in his community of Mamaroneck, New York, having served as a Town Councilman and a member of the Zoning Board of Appeals. He is a former President of the National Association of Shareholder and Consumer Attorneys (NASCAT) as well as Vice President of the Institute for Law and Economic Policy (ILEP).

Mr. Weprin is a member of the American Bar Association, the Association of the Bar of the City of New York, the New York County

Lawyers Association, and the New York State Bar Association. Mr. Weprin is admitted to practice in New York, the United States District Court for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second Circuit, and the United States Supreme Court.

SENIOR COUNSEL

JENNIFER S. CZEISLER graduated from Hofstra University in 1994 with a B.A. degree in psychology. After completing graduate degree work at Hunter School of Social Work (1994-95), she pursued a J.D. degree, which she earned in 1999 from the University of Miami School of Law, where she graduated *cum laude*. Ms. Czeisler was on the editorial board of the *Law Review of Psychology, Public Policy & Law* and earned numerous awards, including the CALI excellence for the Future Award, Dean's Certificate of Achievement Award, and membership in the Phi Delta Phi National Honor Society.

Ms. Czeisler is admitted to practice in the State of New York and is a member of the American Bar Association, where she is committed to her *pro bono* work with the American Bar Association Commission on Legal Problems of the Elderly.

ASSOCIATES

JOHN HUGHES focuses his practice on antitrust, consumer protection, and False Claims Act Litigation as well as e-discovery.

Mr. Hughes graduated from Michigan State University with a B.A. in Political Science in 2005. And earned his J.D. degree from Wayne State University School of Law in 2012.

During law school, Mr. Hughes served as Director of The Free Legal Aid Clinic in Detroit, Co-managing a facility that specializes in providing family and elder law services to city residents. Prior to joining Milberg LLP, John helped lead a non-profit organization with a presence in New York City, Detroit, and Los Angeles that focused on providing legal support to creative communities.

Mr. Hughes is admitted to practice in Michigan.

ROLANDO G. MARQUEZ represents whistleblowers in a wide variety of *qui tam* lawsuits brought under the federal False Claims Act and parallel state false claims laws. His practice includes pursuing fraud cases involving the healthcare industry, defense contractors, and government procurement.

Mr. Marquez's representative False Claims Act matters include *United States ex rel. Miller v. CareCore National LLC, et al.* (resulting in a $54 million recovery for the United States as well as 28 States and the District of Columbia in an intervened action arising from the improper prior authorization of costly diagnostic tests which caused federal and state healthcare programs to pay for tests that were not properly authorized as being medically reasonable or necessary); *Mason v. Medline* (resulting in a recovery of $85 million for the United States in a non-intervened case arising from unlawful kickbacks, bribes, and other illegal remuneration to induce health care providers to continue to purchase defendant's medical supplies, including supplies paid for with government funds tainted by the kickbacks); and *United States ex rel. Marchese v. Cell Therapeutics, Inc.* (resulting in a $10.5 million recovery for the United States in an intervened action arising from the unlawful off-label promotion of the cancer drug Trisenox).

From December 2012 to March 2014, Mr. Marquez was a Senior Litigation Counsel in a boutique New York class-action firm as a member of its False Claims Act practice group. Mr. Marquez was part of the co-counsel team that litigated one of the largest *qui tam* lawsuits ever to settle on a non-intervened basis against Omnicare, Inc., the nation's largest provider of pharmacy services to nursing home patients, and which returned $120 million to the United States Treasury to resolve kickback and false-claims allegations. In addition, Mr. Marquez represented a whistleblower in an action against Smith & Nephew, one of the world's largest medical device manufacturers, in which the company sold products to the government that were manufactured in countries not designated as trade partners of the United States in violation of the Trade Agreements Act.

Before he started in the False Claims Act arena, Mr. Marquez was part of the Milberg LLP team that served as co-lead plaintiffs' counsel in *In re Tyco International, Ltd. Securities Litigation*, one of the largest securities fraud and accountant liability class action suits ever to settle, recovering over $3.2 billion for the company's injured shareholders.

Prior to joining the firm initially, Mr. Marquez was an associate at a boutique New York patent firm, where he concentrated on

patent litigation matters involving medical device, computer software, and consumer electronic device technologies.

Mr. Marquez received a B.S. degree from Brown University in 1994 and his M.S. degree from New York University in 1998. In 2003 he received his J.D. degree from Fordham University School of Law.

Mr. Marquez is admitted to practice in the state courts of New York as well as in the United States District Courts for the Southern and Eastern Districts of New York and the United States Patent and Trademark Office.

J. BIRT REYNOLDS represents whistleblowers who bring claims under the federal False Claims Act and its state counter-parts. Since joining the firm's Qui Tam practice group, he has worked on several cases that have brought substantial recoveries to federal and state governments. Mr. Reynolds also represents plaintiffs in complex commercial litigation involving contractual, tort, and statutory claims. Before joining Milberg, Mr. Reynolds clerked for a magistrate judge in the Middle District of Florida, as well as Florida appellate and trial court judges.

Mr. Reynolds earned his J.D. from Case Western Reserve University School of Law in 2004. He is admitted to practice in the state courts of Florida and New York, the United States District Courts for the Eastern and Southern Districts of New York, the Northern, Middle, and Southern Districts of Florida, and the Western District of Michigan.

CHRISTOPHER SCHUYLER represents whistleblowers in *qui tam* lawsuits brought under the federal False Claims Act and parallel state false claims laws. He also has experience pursuing consumer protection and data breach claims, along with litigating various securities and M&A actions.

Before joining Milberg Tadler Phillips Grossman LLP, Mr. Schuyler clerked with the Fortune Society, a New York City non-profit organization focused on providing an alternative to incarceration for non-violent offenders. While in law school, he co-chaired a student organization promoting pro bono legal assistance to indigent members of the community, a role for which he was awarded a university scholarship for public service.

Mr. Schuyler graduated from Temple University, *cum laude,* with a B.A. degree in 2007. In 2011 he earned his J.D. degree from the University of Dayton School of Law. Mr. Schuyler is a member of the bar of the State of New York and is admitted to practice before the United States District Court for the Southern and Eastern Districts of New York.

ROY SHIMON focuses his practice on securities and stockholder derivative litigation in both state and federal courts. Mr. Shimon also has experience in the areas of insider trading and antitrust litigation. *Super Lawyers* recognized him as a "Rising Star" in the New York Metro area each year from 2014-2018.

Mr. Shimon has served as lead or co-lead counsel in a number of complex matters on behalf of stockholders and employee investors, including *In re PLX Tech. Inc. S'holders Litig.* (Del Ch.) (stockholder recovery of $14.1 million); *In re Zynga Inc. Sec. Litig.* (N.D. Cal.) (investor recovery of $23 million); *In re Popular Inc. ERISA Litig.* (D.P.R.) (employee investor recovery of $8.2 million); and *Shanehchian, et al. v. Macy's Inc.* (S.D. Ohio) (employee investor recovery of $8.5 million). Mr. Shimon currently represents the City of Charlotte, North Carolina in ongoing antitrust litigation in *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J. 2015).

Mr. Shimon graduated *cum laude* from Franklin & Marshall College in 2003, where he was inducted into the Pi Sigma Alpha and Alpha Kappa Delta National Honor

Societies. He received his J.D. from St. John's University School of Law in 2006, where he served on the Executive Board of the Moot Court Honor Society and as Vice President of the Entertainment & Sports Law Society.

Mr. Shimon is admitted to practice in the state and federal courts of New York.

EXHIBIT 45

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF PEGGY WEDGWORTH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF MILBERG LLP**

I, Peggy Wedgworth, declare:

1. I am Peggy Wedgworth of Milberg LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Valentina Juncaj and as counsel for IPPs throughout the course of this litigation. The background and experience of Milberg LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Milberg LLP performed the following work: responding to initial and supplemental discovery requests on behalf of our client and the class, corresponding and coordinating with co-counsel and our client regarding discovery obligations, and preparing our client for a potential deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Milberg LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Milberg LLP during this period of time was 42.8, with a corresponding lodestar based on current rates of $15,187.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Milberg LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Milberg LLP has incurred during the course of this litigation. Milberg LLP expended a total of $1,387.27 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Milberg LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Milberg LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Washington, DC.

/s/ Peggy Wedgworth

Peggy Wedgworth

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

MILBERG LLP

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THE FIRM'S PRACTICE AND ACHIEVEMENTS

Milberg LLP, founded in 1965, was one of the first law firms to prosecute class actions in federal courts on behalf of investors and consumers. The Firm pioneered this type of litigation and is widely recognized as a leader in defending the rights of victims of corporate and other large-scale wrongdoing. The Firm's practice focuses on the prosecution of class and complex actions in many fields, including securities, corporate fiduciary, ERISA, consumer, False Claims Act, antitrust, bankruptcy, mass tort, and human rights litigation. The Firm has offices in New York City, Los Angeles, and Detroit.

In its early years, the Firm built a new area of legal practice in representing shareholder interests under the then recently amended Rule 23 of the Federal Rules of Civil Procedure, which allowed securities fraud cases, among others, to proceed as class actions. In the following decades, the Firm obtained decisions establishing important legal precedents in many of its areas of practice and prosecuted cases that set benchmarks in terms of case theories, organization, discovery, trial results, methods of settlement, and amounts recovered and distributed to clients and class members.

Important milestones in the Firm's early years include the Firm's involvement in the *U.S. Financial* litigation in the early 1970s, one of the earliest large class actions, which resulted in a $50 million recovery for purchasers of the securities of a failed real estate development company; the Ninth Circuit decision in *Blackie v. Barrack* in 1975, which established the fraud-on-the-market doctrine for securities fraud actions; the Firm's co-lead counsel position in the *In re Washington Public Power Supply System Securities Litigation*, a seminal securities fraud action in the 1980s in terms of complexity and amounts recovered; the representation of the Federal Deposit Insurance Corporation in a year-long trial to recover banking losses from a major accounting firm, leading to a precedent-setting global settlement; attacking the Drexel-Milken "daisy chain" of illicit junk-bond financing arrangements with numerous cases that resulted in substantial recoveries for investors; representing life insurance policyholders defrauded by "vanishing premium" and other improper sales tactics and obtaining large recoveries from industry participants; and ground-breaking roles in the multi-front attack on deception and other improper activities in the tobacco industry.

Milberg remains at the forefront in its areas of practice. Significant litigation results include: *In re Vivendi Universal, S.A. Securities Litigation* (jury verdict for plaintiff class in January 2010; final judgments now on appeal); *In re Tyco International, Ltd. Securities Litigation* ($3.2 billion settlement); *In re Nortel Networks Corp. Securities Litigation* (settlement for cash and stock valued at $1.142 billion); *In re Lucent Technologies, Inc. Securities Litigation* ($600 million recovery); *In re Raytheon Co. Securities Litigation* ($460 million recovery); *In re Managed Care Litigation* (recoveries over $1 billion and major changes in HMO practices); the *In re Washington Public Power Supply System Securities Litigation* (settlements totaling $775 million), and the *In re NASDAQ Market-Makers Antitrust Litigation* ($1 billion in recoveries). Milberg has been responsible for recoveries valued at approximately $55 billion during the life of the Firm.

The Firm's lawyers come from many different professional backgrounds. They include prosecutors, private defense attorneys, and government lawyers. The Firm's ability to pursue claims against defendants is augmented by its investigators, headed by a 27-year veteran of the Federal Bureau of Investigation. The Firm is regularly recognized as one of the nation's leading plaintiffs' law firms by the *National Law Journal*, *Legal 500*, *Chambers USA*, and *Super Lawyers*, among others.

For more information, please visit www.milberg.com.

JUDICIAL COMMENDATIONS

Milberg has been commended by countless judges throughout the country for the quality of its representation.

Milberg partners played leading roles in representing class plaintiffs in a nearly four-month jury trial in ***In re Vivendi Universal, S.A. Securities Litigation***, No. 02-5571 (S.D.N.Y.), which in January 2010 resulted in a jury verdict for an international class of defrauded investors (aggregate value of over $9 billion, but class was vastly reduced when subsequent caselaw excluded foreign claimants from coverage of securities statutes; final judgments now on appeal). At the close of the trial, Judge Richard Holwell commented:

> I can only say that this is by far the best tried case that I have had in my time on the bench. I don't think either side could have tried the case better than these counsel have.

In approving a $3.2 billion securities fraud settlement, one of the largest in history, in ***In re Tyco International, Ltd. Securities Litigation***, 535 F. Supp. 2d 249, 270 (D.N.H. 2007), Judge Barbadoro lauded Milberg's efforts as co-lead counsel:

> This was an extraordinarily complex and hard-fought case. Co-Lead Counsel put massive resources and effort into the case for five long years, accumulating [millions of dollars in expenses] and expending [hundreds of thousands of hours] on a wholly contingent basis. But for Co-Lead Counsel's enormous expenditure of time, money, and effort, they would not have been able to negotiate an end result so favorable for the class. . . . Lead Counsel's continued, dogged effort over the past five years is a major reason for the magnitude of the recovery. . . .

In ***Simon v. KPMG LLP***, No. 05-3189, 2006 U.S. Dist. LEXIS 35943, at *18, 30-31 (D.N.J. June 2, 2006), a case in which Milberg served as class counsel, Judge Cavanaugh, in approving the $153 million settlement, found that "Plaintiffs . . . retained highly competent and qualified attorneys" and that "[t]he Initial Complaint . . . demonstrates that [Milberg] expended considerable time and effort with the underlying factual and legal issues in this case before even filing this lawsuit. . . . Settlement discussions were conducted over a period of some fourteen months with the supervision and guidance of Judges Politan and Weinstein, and are evidence of [Milberg's] appreciation of the merits and complexity of this litigation."

In ***In re Lucent Technologies, Inc. Securities Litigation***, 307 F. Supp. 2d 633, 641-47 (D.N.J. 2004), Judge Pisano issued an opinion approving the $600 million settlement and complimenting Milberg's work as co-lead counsel for the class as follows:

> [T]he attorneys representing the Plaintiffs are highly experienced in securities class action litigation and have successfully prosecuted numerous class actions throughout the United States. They are more than competent to conduct this action. Co-Lead Counsel diligently and aggressively represented the Plaintiffs before this Court and in the negotiations that resulted in the Settlement. . . . [T]he efforts and ingenuity of Lead Plaintiffs and Lead Counsel resulted in an extremely valuable Settlement for the Benefit of the Class.

In ***In re Rite Aid Corp. Securities Litigation***, 269 F. Supp. 2d 603, 611 (E.D. Pa. 2003), Judge Dalzell commented on the skill and efficiency of the Milberg attorneys litigating this complex case:

> At the risk of belaboring the obvious, we pause to say a specific word about . . . the skill and efficiency of the attorneys involved. [Milberg was] extraordinarily deft and efficient in handling this most complex matter. [T]hey were at least eighteen months ahead of the United States Department of Justice in ferreting out the conduct that ultimately resulted in the write-down of over $1.6 billion in previously reported Rite Aid earnings. . . . In short, it would be hard to equal the skill class counsel demonstrated here.

MILBERG LLP

NEW YORK
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In ***In re IKON Office Solutions, Inc. Securities Litigation***, 194 F.R.D. 166, 195 (E.D. Pa. 2000), Judge Katz commented on Milberg's skill and professionalism as one of plaintiffs' co-lead counsel:

> First, class counsel is of high caliber and has extensive experience in similar class action litigation. . . . Each of the co-lead counsel firms has a national reputation for advocacy in securities class actions, and there is no doubt that this standing enhanced their ability both to prosecute the case effectively and to negotiate credibly. . . .
>
> Of particular note in assessing the quality of representation is the professionalism with which all parties comported themselves. The submissions were of consistently high quality, and class counsel has been notably diligent in preparing filings in a timely manner even when under tight deadlines. This professionalism was also displayed in class counsel's willingness to cooperate with other counsel when appropriate. . . . This cooperation enabled the parties to focus their disputes on the issues that mattered most and to avoid pointless bickering over more minor matters.

In ***In re NASDAQ Market-Makers Antitrust Litigation***, 187 F.R.D. 465, 474 (S.D.N.Y. 1998), in an opinion approving settlements totaling over $1.027 billion, Judge Sweet commented:

> Counsel for the Plaintiffs are preeminent in the field of class action litigation, and the roster of counsel for Defendants includes some of the largest, most successful and well regarded law firms in the country. It is difficult to conceive of better representation than the parties to this action achieved.

Judicial recognition of Milberg's excellence is not limited to courts within the United States. In ***In re Flag Telecom Holdings, Ltd. Securities Litigation***, No. 02-3400 (S.D.N.Y. 2009), Milberg litigated a discovery dispute before the English Royal High Court of Justice, Queens Bench Division, which recognized the Milberg attorney handling the matter as a "Grade A" lawyer and a "vital cog in the machine." Likewise, in ***Sharma v. Timminco Ltd.***, 09-378701 (Can. Ont. Sup. Ct. 2009), Canada's Ontario Superior Court of Justice recognized Milberg's "fine reputation and excellent credentials" in connection with Milberg's representation in a securities case pending in Canada.

Milberg has also been recognized for its commitment to public service. In lauding Milberg's work representing victims of the September 11th attack on the World Trade Center in connection with the September 11 Victims Compensation Fund, Special Master Kenneth R. Feinberg stated the following:

> Once again, as I have learned over the years here in New York, the [Milberg] firm steps up to the plate in the public interest time and time again. The social conscience of the [Milberg] firm, acting through its excellent associates and partners, help deal with crises that confront the American people and others, and I am personally in the debt of Milberg . . . for the work that it is doing . . . . [T]hey are second among none in terms of the public interest, and I'm very, very grateful, not only to you guys for doing this, but . . . for the firm's willingness to help out. I wanted to let everybody know that.

In re September 11 Victim Compensation Fund, Preliminary Hearing, Claim No. 212-003658 (Dec. 9, 2003).

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NOTEWORTHY RESULTS

The quality of Milberg's representation is further evidenced by the Firm's numerous significant recoveries, some of which are described below.

- ***In re Chase Bank USA, N.A. "Check Loan" Contract Litig.***, No. 09-2032 (N.D. Cal.). Milberg served on the Executive Committee representing the class in this action against JP Morgan Chase & Co. The complaint alleged that Chase improperly increased by 150% the minimum monthly payment requirement for customers who entered into balance transfer loans with "fixed" interest rates that were guaranteed to remain so for the "life of the loan." Milberg and its co-counsel, achieved a $100 million settlement for the class.
- In ***In re Vivendi Universal, S.A. Securities Litigation***, No. 02-5571 (S.D.N.Y.), Milberg lawyers were instrumental in obtaining a jury verdict for a class of defrauded investors after a trial lasting nearly four months. The jury found Vivendi liable for 57 false or misleading class period statements. Final judgments in the case are now on appeal.
- ***Mason v. Medline***, No. 07-05615 (N.D. Ill.). Milberg successfully represented a healthcare worker in a False Claims Act case against his former employer, Medline Industries, Inc., one of the nation's largest suppliers of medical and surgical products, along with its charitable arm, The Medline Foundation. The suit alleged that Medline engaged in a widespread illegal kickback scheme targeting hospitals and other healthcare providers that purchase medical products paid for by federal healthcare programs. Although a party to the settlement agreement, the U.S. Department of Justice chose not to intervene in the lawsuit. Milberg pursued the case on a non-intervened basis and recovered $85 million on behalf of the federal government -- one of the largest settlements of a False Claims Act case in which the government declined to intervene. The whistleblower was awarded 27.5% of the proceeds.
- ***Blessing v. Sirius XM Radio, Inc.***, No. 09-10035 (S.D.N.Y.). This antitrust case stemmed from the 2008 merger of Sirius Satellite Radio, Inc. and XM Satellite Holdings, Inc. that created Sirius XM, the nation's only satellite radio company. The plaintiffs alleged that the merger of the only two U.S. satellite radio providers was an illegal move to eliminate competition and monopolize the satellite radio market. Before the merger, Sirius CEO Mel Karmazin convinced regulators not to block the deal by promising that "the combined company will not raise prices" and that the merger would actually result in "lower prices and more choice for the consumer." After the merger, Sirius quickly reversed course, raised prices by 15-40%, and eliminated multiple radio stations. Milberg achieved a settlement for the class valued at $180 million.
- ***In re Initial Public Offering Securities Litigation***, No. 21-92 (S.D.N.Y.). Milberg represented investors in 310 consolidated securities actions arising from an alleged market manipulation scheme. Plaintiffs alleged, among other things, that approximately 55 defendant investment banks, in dealing with certain of their clients, conditioned certain allocations of shares in initial public offerings on the subsequent purchase of more shares in the aftermarket, thus artificially boosting the prices of the subject securities. This fraudulent scheme, plaintiffs alleged, was a major contributing factor in the now infamous technology "bubble" of the late 1990s and early 2000s. As a member of the court-appointed Plaintiffs' Executive Committee, and with certain partners appointed by the court as liaison counsel, Milberg oversaw the efforts of approximately 60 plaintiffs' firms in combating some of the most well-respected defense firms in the nation. In granting final approval to a $586 million settlement on October 5, 2009, the court described the law firms comprising the Plaintiffs' Executive Committee as the "cream of the crop."

- ***Carlson v. Xerox***, No. 00-1621 (D. Conn). Milberg served as co-lead counsel in this lawsuit, which consolidated 21 related cases alleging violations of the federal securities laws. Plaintiffs alleged that Xerox and several of its top officers reported false financial results during the class period and failed to adhere to the standard accounting practices the company claimed to have followed. In the course of litigating plaintiffs' claims, Milberg engaged in arduous and exhaustive factual discovery, including review and analysis of more than four million pages of complex accounting and auditing documents and thousands of pages of SEC deposition transcripts. Plaintiffs' claims survived three motions to dismiss and a motion for summary judgment, ultimately resulting in a $750 million settlement, which received final approval on January 14, 2009.
- ***In re Tyco International Ltd., Securities Litigation***, MDL 1335 (D.N.H.). Milberg served as co-lead counsel in this litigation, which involved claims under the Securities Act of 1933 and the Securities Exchange Act of 1934 against Tyco and its former CEO, CFO, general counsel, and certain former directors arising out of allegations of Tyco's $5.8 billion overstatement of income and $900 million in insider trading, plus hundreds of millions of dollars looted by insiders motivated to commit the fraud. Plaintiffs also asserted claims under the 1933 and 1934 Acts against PricewaterhouseCoopers LLP for allegedly publishing false audit opinions on Tyco's financial statements during the class period and failing to audit Tyco properly, despite knowledge of the fraud. On December 19, 2007, the court approved a $3.2 billion settlement of the plaintiffs' claims and praised the work of co-lead counsel.
- ***In re Sears, Roebuck & Co. Securities Litigation***, No. 02-7527 (N.D. Ill.). This case involved allegations that Sears concealed material adverse information concerning the financial condition, performance, and prospects of Sears' credit card operations, resulting in an artificially inflated stock price. The approved settlement provided $215 million to compensate class members.
- ***In re General Electric Co. ERISA Litigation***, No. 04-1398 (N.D.N.Y.). This ERISA class action was brought on behalf of current and former participants and beneficiaries of the General Electric ("G.E.") 401(k) Plan. Milberg, serving as co-lead counsel, achieved a $40 million settlement on behalf of current and former G.E. employees who claimed that the company's 401(k) Plan fiduciaries imprudently invested more than two-thirds of the Plan's assets in company stock. The settlement included important structural changes to G.E.'s 401(k) plan valued at more than $100 million.
- ***In re Biovail Corp. Securities Litigation***, No. 03-8917 (S.D.N.Y.). Milberg, representing Local 282 Welfare Trust Fund and serving as co-lead counsel, litigated this complex securities class action brought on behalf of a class of defrauded investors, alleging that defendants made a series of materially false and misleading statements concerning Canadian company Biovail's publicly reported financial results and the company's then new hypertension/blood pressure drug, Cardizem LA. This was a highly complex case in which counsel took numerous depositions across the U.S. and Canada and obtained documents from defendants and several third-parties, including, among others, UBS, McKinsey & Co., and Merrill Lynch. Milberg obtained a $138 million settlement for the class, and Biovail agreed to institute significant corporate governance changes.
- ***In re Nortel Networks Corp. Securities Litigation***, No. 01-1855 (S.D.N.Y.). In this federal securities fraud class action, Milberg served as lead counsel for the class and the court-appointed lead plaintiff, the Trustees of the Ontario Public Service Employees' Union Pension Plan Trust Fund. In certifying the class, the court specifically rejected the defendants' argument that those who traded in Nortel securities on the Toronto Stock Exchange (and not the New York Stock Exchange) should be excluded from the class. The Second Circuit denied the defendants' attempted appeal. On January 29, 2007, the court approved a settlement valued at $1.142 billion.
- ***In re American Express Financial Advisors Securities Litigation***, No. 04-1773 (S.D.N.Y.).

This case involved allegations that American Express Financial Advisors violated securities laws by representing to class members that the company would provide tailored financial advice, when the company actually provided "canned" financial plans and advice designed to steer clients into American Express and certain nonproprietary mutual funds. The case settled for $100 million, with the settlement agreement requiring that the company institute remedial measures.

- ***In re Lucent Technologies, Inc. Securities Litigation***, No. 00-621 (D.N.J.). In this federal securities fraud action in which Milberg served as co-lead counsel, plaintiffs alleged, *inter alia*, that Lucent and its senior officers misrepresented the demand for Lucent's optical networking products and improperly recognized hundreds of millions of dollars in revenues. The settlement provided compensation of $600 million to aggrieved shareholders who purchased Lucent stock between October 1999 and December 2000.
- ***In re Raytheon Co. Securities Litigation***, No. 99-12142 (D. Mass.). This case, in which Milberg served as lead counsel, concerned claims that a major defense contractor failed to write down assets adequately on long term construction contracts. In May 2004, Raytheon and its auditor, PricewaterhouseCoopers LLP, settled for a total of $460 million.
- In ***In re Rite Aid Corp. Securities Litigation***, No. 99-1349 (E.D. Pa.), in which Milberg served as co-lead counsel, the plaintiffs asserted federal securities fraud claims arising out of allegations that Rite Aid failed to disclose material problems with its store expansion and modernization program, resulting in artificially inflated earnings. Judge Dalzell approved class action settlements totaling $334 million against Rite Aid ($207 million), KPMG ($125 million), and certain former executives of Rite Aid ($1.6 million).
- In ***In re CMS Energy Corp. Securities Litigation***, No. 02-72004 (E.D. Mich.), a federal securities fraud case arising out of alleged round-trip trading practices by CMS Energy Corporation, Judge Steeh approved a cash settlement of more than $200 million. Milberg served as co-lead counsel in this litigation.
- ***In re Deutsche Telekom AG Securities Litigation***, No. 00-9475 (S.D.N.Y.). Milberg served as co-lead counsel in this securities class action alleging that Deutsche Telekom issued a false and misleading registration statement, which improperly failed to disclose its plans to acquire VoiceStream Wireless Corporation and materially overstated the value of the company's real estate assets. On June 14, 2005, Judge Buchwald approved a $120 million cash settlement.
- ***In re CVS Corp. Securities Litigation***, No. 01-11464 (D. Mass). Milberg served as co-lead counsel in this class action alleging that defendants engaged in a series of accounting improprieties and issued false and misleading statements which artificially inflated the price of CVS stock. On September 7, 2005, Judge Tauro approved a $110 million cash settlement for shareholders who acquired CVS stock between February 6, 2001, and October 30, 2001.
- ***Scheiner v. i2 Technologies, Inc.***, No. 01-418 (N.D. Tex.). Milberg served as lead counsel in this securities fraud case, filed on behalf of certain purchasers of i2 common stock. The plaintiffs alleged that certain of the company's senior executives made materially false and misleading statements and omissions in i2's public statements and other public documents regarding i2's software, thereby artificially inflating the price of i2's common stock. In May 2004, Milberg recovered a settlement of $84.85 million.
- ***In re Royal Dutch/Shell Transport ERISA Litigation***, No. 04-1398 (D.N.J.). This was an ERISA breach of fiduciary duty class action against the Royal Dutch/Shell Oil Group of Companies on behalf of certain of the companies' U.S. employee investment plan participants. Notably, the $90 million settlement included important provisions regarding the monitoring and training of individuals appointed to be ERISA fiduciaries.
- Milberg served as co-lead counsel in ***Irvine v. ImClone Systems, Inc.***, No. 02-0109 (S.D.N.Y.), in which a $75 million cash

settlement was approved by the court in July 2005. Plaintiffs alleged that ImClone issued a number of misrepresentations and fraudulent statements to the market regarding the likelihood of approval of the drug Erbitux, thereby artificially inflating the price of ImClone stock.

- In ***In re W.R. Grace & Co. (Official Committee of Asbestos Personal Injury Claimants v. Sealed Air Corp. and Official Committee of Asbestos Personal Injury Claimants v. Fresenius Medical Care Holdings, Inc.)***, Nos. 02-2210 and 02-2211 (D. Del.), Milberg acted as lead counsel for the asbestos personal injury and property damage committees in two separate fraudulent conveyance actions within the W.R. Grace bankruptcy. The actions sought to return the assets of Sealed Air Corporation and Fresenius Medical Care Holdings (each of which had been Grace subsidiaries pre-bankruptcy) to the W.R. Grace bankruptcy estate. Complaints in both cases were filed in mid-March 2002, and agreements in principle in both cases were reached on November 27, 2002, the last business day before trial was set to begin in the Sealed Air matter. The two settlements, which consisted of both cash and stock, were valued at approximately $1 billion.
- ***Nelson v. Pacific Life Insurance Co.***, No. 03-131 (S.D. Ga.). Milberg served as lead counsel in this securities fraud class action arising from allegations of deceptive sales of deferred annuity tax shelters to investors for placement in retirement plans that are already tax-qualified. The court approved a $60 million settlement of claims arising from such deception.
- The Firm was lead counsel in ***In re Prudential Insurance Co. Sales Practice Litigation***, No. 95-4704 (D.N.J.), a landmark case challenging Prudential's sales practices that resulted in a recovery exceeding $4 billion for certain policyholders. The settlement was approved in a comprehensive Third Circuit decision.
- In ***In re NASDAQ Market-Makers Antitrust Litigation***, MDL 1023 (S.D.N.Y.), Milberg served as co-lead counsel for a class of investors. The class alleged that the NASDAQ market-makers set and maintained wide spreads pursuant to an industry-wide conspiracy in one of the largest and most important antitrust cases in recent history. After more than three years of intense litigation, the case settled for a total of $1.027 billion, one of the largest antitrust settlements at that time.
- ***In re Washington Public Power Supply System Securities Litigation***, MDL 551 (D. Ariz.) was a massive securities fraud litigation in which Milberg served as co-lead counsel for a class that obtained settlements totaling $775 million, the largest-ever securities fraud settlement at that time, after several months of trial.
- ***In re Exxon Valdez***, No. 89-095 (D. Alaska) and ***In re Exxon Valdez Oil Spill Litigation***, 3 AN-89-2533 (Alaska Sup. Ct. 3d Jud. Dist.). Milberg was a member of the Plaintiffs' Coordinating Committee and co-chair of the Plaintiffs' Law Committee in the massive litigation resulting from the Exxon Valdez oil spill in Alaska in March 1989. Plaintiffs obtained a jury verdict of $5 billion, which, after years of appeals by Exxon, was reduced to approximately $500 million by the United States Supreme Court. Recently the United States Court of Appeals for the Ninth Circuit held that plaintiffs are entitled to post judgment interest on the award in the amount of approximately $470 million.
- In ***In re Managed Care Litigation***, MDL 1334 (S.D. Fla.). Final approval of a settlement between a nationwide class of physicians and defendant CIGNA Healthcare, valued in excess of $500 million, was granted on April 22, 2004. A similar settlement valued in excess of $400 million involving a nationwide class of physicians and Aetna was approved by the court on November 6, 2003. The settlements stem from a series of lawsuits filed in both state and federal courts by physicians and medical associations against many of the nation's largest health insurers arising from allegations that the insurers engaged in a fraudulent scheme to systematically obstruct, reduce, delay, and deny payments and reimbursements to health care providers. These settlements brought sweeping changes to the health care industry and significant improvements to physician-related business practices.

- ***In re Sunbeam Securities Litigation***, No. 98-8258 (S.D. Fla). Milberg acted as co-lead counsel for the class. Plaintiffs alleged that Sunbeam, its auditor, and its management engaged in a massive accounting fraud which led to a restatement of over three years of previously reported financial results. The court approved a combined settlement of more than $140 million, including a $110 million settlement with Arthur Andersen LLP, Sunbeam's auditor. At that time, the Andersen settlement was one of the largest amounts ever paid by a public accounting firm to settle federal securities claims. The settlement with the individuals was achieved on the eve of trial, and ended almost four years of litigation against Andersen and Sunbeam's insiders, including Albert Dunlap, Sunbeam's former Chairman and CEO. The settlement included a personal contribution from Dunlap of $15 million.
- ***In re Triton Energy Limited Securities Litigation***, No. 98-256 (E.D. Tex.). Plaintiffs alleged that defendants misrepresented, among other things, the nature, quality, classification, and quantity of Triton's Southeast Asia oil and gas reserves during the period March 30, 1998 through July 17, 1998. The case settled for $42 million.
- In ***In re Thomas & Betts Securities Litigation***, No. 00-2127 (W.D. Tenn.), the plaintiffs, represented by Milberg as co-lead counsel, alleged that Thomas & Betts engaged in a series of accounting improprieties while publicly representing that its financial statements were in compliance with GAAP, and failed to disclose known trends and uncertainties regarding its internal control system and computer and information systems. The case settled for $46.5 million dollars in cash from the company and $4.65 in cash from its outside auditor, KPMG.
- ***In re MTC Electronic Technologies Shareholder Litigation***, No. 93-0876 (E.D.N.Y.). Plaintiffs alleged that defendants issued false and misleading statements concerning, among other things, purported joint venture agreements to establish telecommunications systems and manufacture telecommunications equipment in China. The court approved a settlement of $70 million, including $65 million in cash and $5 million worth of MTC Class A shares with "put" rights.
- In ***In re PaineWebber Limited Partnerships Litigation***, No. 94-8547 (S.D.N.Y.). Milberg represented investors alleging that PaineWebber developed, marketed, and operated numerous investment partnerships as part of an ongoing conspiracy to defraud investors and enrich itself through excessive fees and commissions over a twelve-year period. On March 20, 1997, Judge Sidney Stein approved a $200 million settlement, consisting of $125 million in cash and $75 million worth of guarantees and fee waivers.
- In ***Andrews v. AT&T***, No. 91-175 (S.D. Ga.) the Firm represented a class of persons who paid for premium-billed "900-number" calls that involved allegedly deceptive games of chance, starting in 1993. Defendants included major long-distance companies, which approved the call programs and billed for the calls. Defendant MCI settled for $60 million in benefits. The class against AT&T was decertified on appeal and the Firm prosecuted the individual plaintiffs' claims, obtaining a jury verdict in 2003 for compensatory and punitive damages.

In the context of shareholder derivative actions, Milberg has protected shareholder investments by effectuating important changes in corporate governance as part of the global settlement of such cases. Cases in which such changes were made include:

- ***In re Comverse Technology, Inc. Derivative Litigation***, No. 601272/2006 (N.Y. Sup. Ct. N.Y. Cnty.). On December 28, 2009, Milberg announced a $62 million settlement for the derivative plaintiffs, which was approved by the Court on June 23, 2010. The settlement also resulted in significant corporate governance reforms, including the replacement of the offending directors and officers with new independent directors and officers; the amendment of the company's bylaws to permit certain long-term substantial shareholders to propose, in the Company's own proxy materials, nominees for election as directors (proxy access); and the requirement that all equity grants be approved by both the

Compensation Committee and a majority of the non-employee members of the Board.

- ***In re Topps Co., Inc. Shareholder Litig.***, No. 600715/2007 (N.Y. Sup. Ct. N.Y. Cnty. Apr. 17, 2007). Milberg served as co-lead counsel in this transactional case, which led to a 2007 decision vindicating the rights of shareholders under the rules of comity and the doctrine of *forum non conveniens* to pursue claims in the most relevant forum, notwithstanding the fact that jurisdiction might also exist in the state of incorporation. This case was settled in late 2007 in exchange for a number of valuable disclosures for the class.
- ***In re Marketspan Corporate Shareholder Litigation***, No. 15884/98 (N.Y. Sup. Ct. Nassau Cnty.). The settlement agreement in this derivative case required modifications of corporate governance structure, changes to the audit committee, and changes in compensation awards and to the nominating committee.
- ***In re Trump Hotels Shareholder Derivative Litigation***, No. 96-7820 (S.D.N.Y.). In this case, the plaintiff shareholders asserted various derivative claims on behalf of the company against certain Trump entities and senior Trump executives in connection with the self-serving sale of a failing casino to the company in which the plaintiffs held stock. Milberg negotiated a settlement on behalf of the plaintiffs that required Donald Trump to contribute a substantial portion of his personal interest in a pageant he co-owned. In addition, the settlement required the company to increase the number of directors on its board, and certain future transactions had to be reviewed by a special committee.

MILBERG LLP

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PRECEDENT-SETTING DECISIONS

Milberg has consistently been a leader in developing the federal securities, antitrust, and consumer protection laws for the benefit of investors and consumers. The Firm has represented individual and institutional plaintiffs in hundreds of class action litigations in federal and state courts throughout the country. In most of those cases, Milberg has served as lead or co-lead counsel. The Firm has also been responsible for establishing many important precedents, including the following:

- ***Platinum Partners v. Chicago Board Options Exchange, Inc.***, No. 1-11-2903 (Ill. App. Ct. 2012). Milberg represented an investment management group in a case against the Chicago Board Options Exchange, Inc. ("CBOE") and Options Clearing Corp. ("OCC"). The plaintiff investment management group alleged that it was injured when the CBOE and OCC privately disclosed strike price information to certain insiders prior to the information being made public. In the interim between the private disclosure and the public announcements, the plaintiff purchased tens of thousands of affected options. The lower court dismissed the complaint on the grounds that the CBOE and OCC, as self-regulatory organizations, were immune from suit. However, the Appellate Court reversed, holding that a private disclosure to insiders served no regulatory purpose and should not be protected from suit. The Illinois Supreme Court declined the defendants' petition for leave to appeal.
- ***In re Merck & Co., Inc. Securities Litigation***, Nos. 05-1151 and 05-2367 (D.N.J.). Milberg served as co-lead counsel in this federal securities fraud class action, and following over 12 years of hard-fought litigation, ultimately obtained a combined settlement totaling $1.062 billion, the largest securities class action settlement ever against a pharmaceutical company, which received final approval on June 28, 2016. This lawsuit involved claims under the Securities Exchange Act of 1934 against Merck and certain of its executives arising out of allegations that defendants made materially false and misleading statements concerning the safety profile and commercial viability of Merck's purported "blockbuster" drug VIOXX. During this litigation, Milberg and co-lead counsel engaged in exhaustive discovery, including the review and analysis of over 35 million pages of documents involving complex scientific and medical issues, as well as the examination of over 59 fact and expert witnesses. Plaintiffs successfully appealed the dismissal of this action on state of limitations grounds to the Third Circuit Court of Appeals, and prevailed in defendants' further appeal to the Supreme Court, resulting in a unanimous decision by the Supreme Court in Plaintiffs' favor which clarified the law regarding the application of the statute of limitations to federal securities fraud claims. Plaintiffs' claims also survived additional motions to dismiss and motions for summary judgment, and the parties reached settlement less than three months before trial was scheduled to commence.
- ***In re Lord Abbett Mutual Funds Fee Litigation***, 553 F.3d 248 (3d Cir. 2009). This important decision set significant precedent regarding the scope of preemption under the Securities Litigation Uniform Standards Act of 1998 ("SLUSA"). In reversing the District Court's dismissal of the plaintiffs' claims, the Third Circuit held that "SLUSA does not mandate dismissal of an action in its entirety where the action includes only some pre-empted claims." In so holding, the court explained that "nothing in the language, legislative history, or relevant case law mandates the dismissal of an entire action that includes both claims that do not offend SLUSA's prohibition on state law securities class actions and claims that do . . . ."
- ***Abdullahi v. Pfizer, Inc.,*** 562 F.3d 163, 170 (2d Cir. 2009). In this matter, the plaintiffs, Nigerian children and their families, asserted claims under the Alien Tort Statute ("ATS") in connection with Pfizer's clinical trial of the drug, Trovan, without their knowledge. In January 2009, the Second Circuit reversed the District Court's dismissal

for lack of jurisdiction. The court held that the plaintiffs pled facts sufficient to state a cause of action under the ATS for a violation of international law prohibiting medical experimentation on human subjects without their consent.

- ***In re Comverse Technology, Inc. Derivative Litigation***, 866 N.Y.S.2d 10 (App. Div. 1st Dep't 2008). In this derivative case in which Milberg serves as co-lead counsel, plaintiff shareholders sued certain of the company's officers and directors based on allegations of illegal options backdating. The lower court dismissed the plaintiffs' claims, holding that the plaintiffs failed to make a pre-suit demand on the company's board, and that in any event, the board had already formed a special committee to investigate the misconduct. In this significant opinion reversing the lower court's dismissal, the Appellate Division clarified the standards of demand futility and held that a board of directors loses the protection of the business judgment rule where there is evidence of the directors' self-dealing and poor judgment. The court noted that the mere creation of a special committee did not justify a stay of the action and did not demonstrate that the board took appropriate steps. Rather, "the picture presented in the complaint is that of a special committee taking a tepid rather than a vigorous approach to the misconduct and the resultant harm. Under such circumstances, the board should not be provided with any special protection."
- ***South Ferry LP #2 v. Killinger***, 542 F.3d 776 (9th Cir. 2008). The important opinion issued by the Ninth Circuit in this securities fraud class action clarified, in the post-*Tellabs* environment, whether a theory of scienter based on the "core operations" inference satisfies the PSLRA's heightened pleading standard. In siding with the plaintiffs, represented by Milberg, the Ninth Circuit held that "[a]llegations that rely on the core operations inference are among the allegations that may be considered in the complete PSLRA analysis." The court explained that under the "holistic" approach required by *Tellabs*, all allegations must be "read as a whole" in considering whether plaintiffs adequately plead scienter. After remand, the District Court found that the plaintiffs sufficiently alleged scienter under the Ninth Circuit's analysis.
- ***In re Gilead Sciences Securities Litigation***, 536 F.3d 1049 (9th Cir. 2008). In this securities fraud class action in which Milberg represents the plaintiffs, the Ninth Circuit reversed the District Court's dismissal of the complaint in this opinion clarifying loss causation pleading requirements. In ruling that the plaintiffs adequately pled loss causation, the Ninth Circuit held that the plaintiffs' complaint identified a "specific economic loss" following the issuance of a specific press release, along with allegations of misrepresentations that were described in "abundant detail." The opinion established that plaintiffs in a securities fraud action adequately plead loss causation where they provide sufficient detail of their loss causation theory and some assurance that the theory has a basis in fact. Based on this analysis, the dismissal was reversed, and the case was remanded to the District Court for further proceedings.
- In ***Tellabs, Inc. v. Makor Issues & Rights, Ltd.***, 551 U.S. 308 (2007), in which Milberg is lead counsel for the class, the United States Supreme Court announced a uniform standard for evaluating the sufficiency of a complaint under the PSLRA. The court held that on a motion to dismiss, a court "must consider the complaint in its entirety," accepting "all factual allegations in the complaint as true," as well as "tak[ing] into account plausible opposing inferences." On remand, the Seventh Circuit concluded that "the plaintiffs have succeeded, with regard to the statements identified in our previous opinion as having been adequately alleged to be false and material, in pleading scienter in conformity with the requirements of the PSLRA. We therefore adhere to our decision to reverse the judgment of the district court dismissing the suit." The unanimous decision was written by Judge Richard A. Posner.
- ***Asher v. Baxter International, Inc.***, 377 F.3d 727 (7th Cir. 2004). In reversing and remanding the District Court's dismissal, the Seventh Circuit resolved in plaintiffs' favor an important issue involving the PSLRA's "safe harbor" for forward-looking statements. The

court held that whether a cautionary statement is meaningful is an issue of fact, because whether a statement is meaningful or not depends in part on what the defendant knew when the statement was made as well as other issues of fact. Thus, this issue is not appropriately resolved on a motion to dismiss.

- ***Gebhardt v. ConAgra Foods, Inc.***, 335 F.3d 824 (8th Cir. 2003). This important decision strongly reaffirmed the principle that whether an undisclosed fact would have been material to investors cannot ordinarily be decided on a motion to dismiss. The Eighth Circuit, stressing that "[t]he question of materiality hinges on the particular circumstances of the company in question," observed that even relatively small errors in financial statements might be material if they concern areas of particular importance to investors and raise questions about management integrity.
- ***In re Cabletron Systems, Inc.***, 311 F.3d 11 (1st Cir. 2002). In this opinion, the First Circuit joined the Second Circuit in allowing a complaint to be based on confidential sources. The court also accepted the argument made by plaintiffs, represented by Milberg, that courts should consider the amount of discovery taken place prior to deciding a motion to dismiss, with a lack of discovery resulting in a correspondingly less stringent standard for pleading securities fraud claims with particularity.
- In ***Puckett v. Sony Music Entertainment***, No. 108802/98 (N.Y. Sup. Ct. N.Y. Cnty. 2002), a class action was certified against Sony Music Entertainment on behalf of a class of recording artists who were parties to standard Sony recording or production agreements entered into during the class period. The complaint alleged that Sony had a policy of treating the value added tax on foreign sales of recordings improperly thereby impermissibly reducing the royalties paid or credited to the class members. Justice DeGrasse of the New York State Supreme Court determined that class certification was appropriate and that Gary Puckett (of Gary Puckett & the Union Gap) and jazz musician and composer Robert Watson were appropriate class representatives to represent the class of artists and producers to whom Sony accounts for foreign record royalties.
- ***Novak v. Kasaks***, 216 F.3d 300 (2d Cir. 2000). The Firm was lead counsel in this seminal securities fraud case in which the Second Circuit undertook an extensive analysis of the statutory text and the legislative history of the PSLRA and pre-existing Second Circuit case law. Among other things, the Second Circuit held that the PSLRA's pleading standard for scienter was largely equivalent to the pre-existing Second Circuit standard and vacated the District Court's dismissal which sought to impose a higher standard for pleading scienter under the PSLRA. The Second Circuit also rejected any general requirement that plaintiffs' confidential sources must be disclosed to satisfy the PSLRA's newly-enacted particularity requirements.
- ***In re Advanta Corp. Securities Litigation***, 180 F.3d 525 (3d Cir. 1999). Here, the plaintiffs, represented by Milberg, successfully argued that under the PSLRA, scienter is sufficiently pled by making an adequate showing that the defendants acted knowingly or with reckless disregard for the consequences of their actions. The Third Circuit specifically adopted the Second Circuit's scienter pleading standard for pleading fraud under the PSLRA.
- In ***Hunt v. Alliance North American Government Income Trust, Inc.***, 159 F.3d 723 (2d Cir. 1998), the Second Circuit reversed the District Court's ruling, which denied plaintiffs leave to amend to assert a cause of action against defendants for failing to disclose that the defendant Trust was unable to utilize proper "hedging" techniques to insure against risk of loss. In the court's view, taken together and in context, the Trust's representations would have misled a reasonable investor.
- In ***Shaw v. Digital Equipment Corp.***, 82 F.3d 1194 (1st Cir. 1996), the First Circuit remanded plaintiffs' action after affirming, in part, Milbergs' position that in association with the filing of a prospectus related to the issuance of securities, a corporate-issuer must disclose intra-quarter, materially adverse changes in its business, if such adverse changes constitute

"material changes" the disclosure of which is required pursuant to the Securities Act of 1933.

- ***In re Salomon, Inc. Shareholders Derivative Litigation***, 68 F.3d 554 (2d Cir. 1995). The Second Circuit affirmed the District Court's holding that derivative federal securities claims against defendants would not be referred to arbitration pursuant to the arbitration provisions of the Rules of the New York Stock Exchange, but would be tried in District Court. Shortly thereafter, the case settled for $40 million.
- ***Kamen v. Kemper Financial Services, Inc.***, 500 U.S. 90 (1991). The Supreme Court upheld the right of a stockholder of a mutual fund to bring a derivative suit without first making a pre-suit demand. Specifically, the Court held that "where a gap in the federal securities laws must be bridged by a rule that bears on the allocation of governing powers within the corporation, federal courts should incorporate state law into federal common law unless the particular state law in question is inconsistent with the policies underlying the federal statute. . . . Because a futility exception to demand does not impede the regulatory objectives of the [Investment Company Act], a court that is entertaining a derivative action under that statute must apply the demand futility exception as it is defined by the law of the State of incorporation."
- ***Mosesian v. Peat, Marwick, Mitchell & Co.***, 727 F.2d 873 (9th Cir. 1984), *cert. denied*, 469 U.S. 932 (1984). The Ninth Circuit upheld an investor's right to pursue a class action against an accounting firm, adopting statute of limitation rules for Section 10(b) suits that are favorable to investors.
- ***Hasan v. CleveTrust Realty Investors***, 729 F.2d 372 (6th Cir. 1984). The Sixth Circuit very strictly construed, and thus narrowed, the ability of a "special litigation committee" of the board of a public company to terminate a derivative action brought by a shareholder.
- ***Fox v. Reich & Tang, Inc.***, 692 F.2d 250 (2d Cir. 1982), *aff'd sub nom*, ***Daily Income Fund, Inc. v. Fox***, 464 U.S. 523 (1984). The court held that a Rule 23.1 demand is not required in a shareholder suit brought pursuant to Section 36(b) of the Investment Company Act.
- ***Rifkin v. Crow***, 574 F.2d 256 (5th Cir. 1978). The Fifth Circuit reversed an order granting summary judgment for defendants in a Section 10(b) case, paving the way for future acceptance of the "fraud-on-the-market" rationale in the Fifth Circuit.
- ***Blackie v. Barrack***, 524 F.2d 891 (9th Cir. 1975), *cert. denied*, 429 U.S. 816 (1976). This is the seminal appellate decision on the use of the "fraud-on-the-market" theory of reliance, allowing investors who purchase stock at artificially inflated prices to recover even if they were personally unaware of the false and misleading statements reflected in the stock's price. In so holding, the court noted that class actions are necessary to protect the rights of defrauded purchasers of securities.
- ***Bershad v. McDonough***, 300 F. Supp. 1051 (N.D. Ill. 1969), *aff'd*, 428 F.2d 693 (7th Cir. 1970). In this case, the plaintiff, represented by Milberg, obtained summary judgment on a claim for violation of Section 16(b) of the Securities Exchange Act, where the transaction at issue was structured by the defendants to look like a lawful option. The decision has been cited frequently in discussions as to the scope and purpose of Section 16(b).
- ***Heit v. Weitzen***, 402 F.2d 909 (2d Cir. 1968). The court held that liability under Section 10(b) of the Securities Exchange Act extends to defendants, such as auditors, who were not in privity with the named plaintiffs or the class represented by the named plaintiffs.

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PARTNERS

ROBERT A. WALLNER received his B.A. degree from the University of Pennsylvania in 1976 graduating *magna cum laude*. He attended New York University School of Law, earning his J.D. degree in 1979. He was elected to the law school's Order of the Coif and served as an editor of the *New York University Law Review*.

Mr. Wallner has litigated complex securities, consumer and antitrust class actions throughout the country. He currently represents plaintiffs in lawsuits arising out of the Madoff Ponzi scheme. He has also represented investors in *In re Initial Public Offering Securities Litigation* (S.D.N.Y), *In re CMS Energy Corporation Securities Litigation* (E.D. Mich.), and *In re Deutsche Telekom AG Securities Litigation* (S.D.N.Y.), and consumers in *In re Synthroid Marketing Litigation* (N.D. Ill.) and the *Mercedes-Benz Tire Litigation* (D.N.J.).

Mr. Wallner is a frequent lecturer on securities and complex litigation issues. He has served on the editorial board of *Securities Litigation Report*, as a faculty member of the American Bar Association's First Annual National Institute on Securities Litigation and Arbitration, and as a member of the Federal Courts Committee of the Association of the Bar of the City of New York. He has been recognized in Lawdragon's "100 Lawyers You Need to Know in Securities Litigation."

SANFORD P. DUMAIN attended Columbia University where he received his B.A. degree in 1978. He graduated *cum laude* from Benjamin N. Cardozo School of Law of Yeshiva University in 1981.

Mr. Dumain represents plaintiffs in cases involving securities fraud, consumer fraud, insurance fraud, and violations of the antitrust laws.

Mr. Dumain was co-lead counsel in *In re Tyco International Ltd., Securities Litigation* in which $3.2 billion was recovered for investors. Mr. Dumain also served as lead counsel in the securities class actions against Nortel and Biovail, which are the highest and third highest recoveries ever in cases involving Canadian companies. The *Nortel* settlement was valued at over $1 billion and *Biovail* settled for over $138 million in cash. Mr. Dumain successfully represented the City of San Jose, California against 13 of the City's broker-dealers and its outside accountants in connection with major losses in unauthorized bond trading.

Mr. Dumain began his career as a law clerk to Judge Warren W. Eginton, United States District Court for the District of Connecticut 1981-1982. During the early years of his practice, he also served as an Adjunct Instructor in Legal Writing and Moot Court at Benjamin N. Cardozo School of Law.

Mr. Dumain has lectured for ALI-CLE concerning accountants' liability and has prosecuted several actions against accounting firms.

Judge Janet C. Hall of the District of Connecticut made the following comment in *In re Fine Host Corporation Securities Litigation* No. 97-2619 (D.Conn.): "The court also finds that the plaintiff class received excellent counseling, particularly from the Chair of the Plaintiffs' Executive Committee, Attorney Dumain."

Mr. Dumain is admitted to practice in the State of New York, United States District Court for the Southern, Eastern, and Western Districts of New York, District of Colorado, and District of Connecticut, and United States Courts of Appeals for the First, Second, Third, Sixth, Seventh, and Eighth Circuits.

Mr. Dumain is the Chair of the Firm's Executive Committee.

BARRY A. WEPRIN graduated from Harvard College in 1974. He received a J.D. degree from the New York University School of Law in 1978, and a master of public affairs from the Woodrow Wilson School of Princeton University in 1978. While in law school, Mr. Weprin was notes and comments editor of the *New York University Law Review*.

Since joining Milberg, Mr. Weprin has specialized in securities and insurance litigation. He has served as lead or co-lead counsel in a number of complex securities class action litigations. He was one of the principal attorneys in the sales practice litigations against The New York Life Insurance Company, The New England Life Insurance Service Company, The Massachusetts Mutual Life Insurance Company, The John Hancock Mutual Life Insurance Company, and The Prudential Life Insurance Company which recovered billions of dollars for policyholders. Mr. Weprin is a frequent lecturer on complex litigation issues.

Previously, Mr. Weprin served as law clerk to Judge Charles P. Sifton of the United States District Court for the Eastern District of New York and was associated with the law firm of Wachtell Lipton Rosen & Katz where he specialized in commercial and securities litigation. He also served as general counsel to the New York State Housing Finance Agency and the New York State Medical Care Facilities Finance Agency, two agencies that issue tax exempt bonds for financing nonprofit medical facilities and qualified housing projects.

Mr. Weprin is very active in his community of Mamaroneck, New York, having served as a Town Councilman and a member of the Zoning Board of Appeals. He is President of the National Association of Shareholder and Consumer Attorneys (NASCAT) as well as Vice President of the Institute for Law and Economic Policy (ILEP).

Mr. Weprin is a member of the American Bar Association, the Association of the Bar of the City of New York, the New York County Lawyers Association, and the New York State Bar Association. Mr. Weprin is admitted to practice in New York, the United States District Court for the Southern and Eastern Districts of New York, the United States Court of Appeals for the Second Circuit, and the United States Supreme Court.

BRAD N. FRIEDMAN focuses his practice on various complex commercial matters, including securities, qui tam, SEC whistleblower, bankruptcy, consumer, and life insurance class actions.

Mr. Friedman has recovered billions of dollars on behalf of injured plaintiffs, including as lead counsel in numerous "vanishing premium" and "churning" life insurance sales practice class actions (including cases against Prudential and Metropolitan Life).

In 2009, after eight years of arduous litigation, Mr. Friedman recovered $750 million for shareholders in *Carlson v. Xerox*, one of the 10 largest securities class-action settlements in U.S. history. Judge Thompson noted the complexity of the international accounting case and complimented Milberg's legal work, saying, "The class received high-quality legal representation and obtained a very large settlement in the face of vigorous opposition by highly experienced and skilled defense counsel."

In 2002, Mr. Friedman acted as lead counsel on behalf of various asbestos committees in the *W.R. Grace* bankruptcy and successfully recovered approximately $1 billion through a fraudulent conveyance litigation that settled on the eve of trial.

Mr. Friedman is currently representing numerous whistleblowers in a variety of qui tam and SEC-related matters.

Mr. Friedman began his legal career as a clerk to the Honorable Max Rosenn, United States Court of Appeals for the Third Circuit. Following his clerkship, Mr. Friedman was associated with Simpson Thacher & Bartlett LLP, where he worked until 1994. Mr. Friedman became a Milberg partner in 1996.

He is a member of the American Constitution Society, the Federal Bar Council, the American Bar Association, the American Association for Justice, the New York State Bar Association, and the New York City Bar Association.

Mr. Friedman graduated from Cornell University in 1982 with a B.A. degree. He received his J.D., *cum laude*, from New York University School of Law in 1986.

ARIANA J. TADLER is a partner at Milberg LLP and an elected member of the Firm's Executive Committee. She has extensive experience litigating and managing complex securities and consumer class actions, including high profile, fast-paced cases. Ms. Tadler is widely recognized as one of the nation's leading authorities on electronic discovery and chairs Milberg's E-Discovery Practice Group. Ms. Tadler is regularly invited to speak on a variety of litigation and discovery-related topics and has authored numerous publications on E-Discovery. Ms. Tadler is also a Principal in Meta-e Discovery LLC, which is the result of the spin off of Milberg's prior Litigation Support and Data Hosting services division that Ms. Tadler helped to build.

Ms. Tadler is currently serving as lead counsel in a number of consumer cases involving the mislabeling as "natural" products that contained GMOs, including *In re ConAgra Foods, Inc*., and is a member of the Steering Committee in *In re Target Corporation Customer Data Security Breach Litigation*, representing consumers in a class action accusing Target Corp. of failing to protect customers from a massive data breach during the holiday shopping season. Ms. Tadler is lead counsel in *Ironworkers District Council of Philadelphia & Vicinity Retirement & Pension Plan v. Lamberto Andreotti*, pending in Delaware Chancery Court. She also recently successfully represented an alternative energy company in its claims of negligence against one of the Big 4 accounting firms. Ms. Tadler's accomplishments also include litigation of three cases in the Eastern District of Virginia (a/k/a the "Rocket Docket") in less than four years, including *In re MicroStrategy Securities Litigation* in which plaintiffs' counsel negotiated settlements valued at more than $150 million. Ms. Tadler served as one of the court-appointed plaintiffs' liaison counsel in the *Initial Public Offering Securities Litigation* in which the court approved a $586 million cash settlement. Among the thousands of defendants in this coordinated action were 55 prominent investment banks and more than 300 corporate issuers.

Ms. Tadler's extensive experience acting as Special Discovery Counsel in complex litigation and class actions includes representing the government of Colombia as Special Discovery Counsel in its pursuit of claims alleging smuggling and illegal sales of alcohol by several international companies for violation of United States RICO statutes and other common law claims. The engagement encompassed identifying relevant information responsive to defendants' requests, confirming and guiding preservation practices, and interviewing and collecting data from more than 100 custodians in 23 Colombian Departments (Colombia's equivalent to our States in the U.S.). The team also reviewed and produced data in the litigation, and was tasked with ensuring compliance with the various privacy laws of Colombia and the United States with regard to personal data, controlled data and the transfer of sensitive information — all hot topics in the area of E-Discovery today.

Ms. Tadler serves on The Sedona Conference®'s Board of Directors and, after having served for five years as Chair, is now Chair Emeritus of the Steering Committee for Working Group 1 on Electronic Document Retention and Production, the preeminent "think tank" on E-Discovery. In addition, she is on the Advisory Board of Georgetown University Law Center's Advanced E-Discovery Institute where she has helped educate federal judges and lawyers on E-Discovery issues and also serves on Bloomberg BNA's eDiscovery Board of Advisors. In addition to serving on the Advisory Committee of the Judicial Improvements Committee of the Southern District of New York, Ms. Tadler is on the committee of the Seventh Circuit Electronic Discovery Pilot Program and also actively involved in the reformulation of applicable E-Discovery rules and best practices. Recently, Ms. Tadler was appointed to serve as the Executive Director for the Board of Advisors of the Benjamin N. Cardozo School of Law's Data Law Initiative, a comprehensive program of courses focused on various aspects of data law including information governance, E-Discovery and cybersecurity.

An AV® Preeminent rated (Martindale Hubbell's highest rating) lawyer, Ms. Tadler has been recognized by several prominent legal industry rating organizations, including 2014 Chambers USA: America's Leading Lawyers for Business as

"a leading light in the plaintiffs' Bar" and a "fearless and tenacious" advocate who wins praise for her in-depth e-discovery knowledge and efficient approach. Clients also praise her ability to "navigate all the E-Discovery issues." For four years in a row, Lawdragon included her in its select list of 500 Leading Lawyers in America, describing her as "one of the nation's most talented plaintiff-side securities litigators" and crediting her with building Milberg's "team of lawyers and technologists armed with the necessary hardware and software to provide a solid and reliable service." Benchmark Litigation has also included her in its 2014 Top 250 Women Litigators in the U.S. and she was named in Super Lawyers 2014 "Top 50: Women Lawyers" in the New York Metro-area. In 2015, Ms. Tadler was selected as a *Who's Who Legal Litigation: Leading Practitioner-E-Discovery*.

Ms. Tadler chairs Milberg's Client Development Committee and is a member of the Hiring and Technology Committees. Ms. Tadler is a member of several legal industry associations, including: American Bar Association; American Bar Foundation (Fellow); American Association for Justice; Federal Bar Council; New York State Bar Association; National Association of Women Lawyers; New York County Lawyers Association; New York Women's Bar Association; and The New York Inn of Court (Vice President). Ms. Tadler is a fellow of the prestigious Litigation Counsel of America, an invitation-only trial lawyer honorary society that recognizes the country's top attorneys. She is also involved in various community and not-for-profit organizations and currently serves on the board of MFY Legal Services, Inc.

Ms. Tadler graduated from Hamilton College in 1989. In 1992, she received her J.D. from Fordham University School of Law, where she was the Articles and Commentary Editor of the Fordham Urban Law Journal, a member of the Moot Court Board, and the 1990 recipient of the American Jurisprudence Award in Criminal Law.

MATTHEW GLUCK was a litigation partner for over 30 years at Fried, Frank, Harris, Shriver & Jacobson LLP prior to joining Milberg. He frequently represented U.S. and foreign businesses and individuals in major litigation and other complex matters. He has also assisted clients in both formal bankruptcies and out-of-court restructurings of financially troubled companies.

Mr. Gluck twice served as adviser to the court in the restructuring of the Manville Trust in *In re Johns-Manville Corp.*, No. 85-8922 (S.D.N.Y.) and was the legal representative for future claimants in the Chapter 11 filing of Keene Corporation in *In re Keene Corp.*, No. 93-46090 (Bankr. S.D.N.Y.). He also serves as a local judge in Muttontown, New York. He was one of the lead attorneys for the plaintiffs in the trial against Vivendi which resulted in what may be the largest jury verdict for plaintiffs in a securities class action. He conducted the examination of Vivendi's former CEO, CFO, and their accounting expert.

Mr. Gluck is admitted to the bar of the State of New York.

MATTHEW A. KUPILLAS graduated from the State University of New York at Albany in 1990 with a B.A. degree in philosophy. In 1994, Mr. Kupillas received his J.D. degree from New York University School of Law. Mr. Kupillas focuses his practice primarily on class actions on behalf of defrauded investors and consumers, as well as complex commercial litigation. He is a member of the bar of the State of New York and is admitted to practice before the United States District Court for the Southern and Eastern Districts of New York, the District of Colorado, the Eastern District of Wisconsin, and the United States Court of Appeals for the Tenth Circuit.

KENT A. BRONSON received a B.A. from State University of New York at Binghamton in 1994. He graduated *cum laude* from University of Pittsburgh School of Law in 1998. During law school, Mr. Bronson was a research editor on the Law Review and a recipient of the Dean's Scholarship.

Mr. Bronson's practice is focused on securities, consumer and class action litigation. Prior to joining Milberg, while associated with another law firm, Mr. Bronson was part of a team of attorneys representing New York homeowners in *In re Coordinated Title Insurance Litigation*, Index No. 009600/2003 (N.Y. Sup. Ct. Nassau Cnty.) who alleged that eight insurance companies doing business in New York state overcharged them for

title insurance in refinance transactions. The litigation resulted in complete recovery to homeowners submitting valid claims, and reportedly the largest settlement of a consumer class action in Nassau County. The presiding Justice, in approving the $31.5 million settlement of that litigation, described the prosecution of the case as reflecting "lawyering of the highest quality." Also, in *In re Providian Financial Securities Litigation*, MDL 1301 (E.D. Pa.), Mr. Bronson was one of the attorneys representing the Xerox (GB) Pension Scheme (which reportedly oversees approximately $2.5 billion in employee retirement funds for the British affiliate of Xerox Corp.) in a securities fraud class action lawsuit alleging that a major credit card company inflated its profits with illegal charges to consumers. The Court commented, in approving the $38 million settlement of that case, on the "extremely high quality" and "skill and efficiency" of plaintiffs' counsel's work.

Mr. Bronson has litigated numerous complex class action and shareholder derivative cases in various state and federal courts, including, among others, *In re Biovail Corp. Securities Litigation*, No. 03-8917 (S.D.N.Y.) (in which Milberg LLP served as co-lead counsel on behalf of the Local 282 Welfare Trust Fund, and which was settled for $138 million and certain corporate governance modifications); *City of Miami Police Relief & Pension Fund v. Ryland Group, Inc.*, No. BC411143 (Cal. Super. Ct. Los Angeles Cnty.); *New Jersey Carpenters Annuity Fund v. Meridian Diversified Fund Management, LLC*, No. 10-5738 (S.D.N.Y.); *New Jersey Carpenters Pension Fund v. infoGroup, Inc.*, No. 5334-VCN (Del. Ch.); and *In re Massey Energy Co. Derivative & Class Action Litigation*, No. 5430-VCS (Del. Ch.).

During law school, Mr. Bronson was a research editor of the University of Pittsburgh Law Review and a recipient of the University of Pittsburgh School of Law Dean's Scholarship.

Mr. Bronson is admitted to practice in New York State courts, the United States District Courts for the Southern, Eastern and Northern Districts of New York, and the United States Courts of Appeals for the Second and Tenth Circuits.

LEIGH SMITH received a B.A. degree, with high honors, and an M.A. degree from Rutgers University. Ms. Smith received a J.D. degree from Cornell Law School in 1999.

Ms. Smith focuses her practice primarily on class actions on behalf of defrauded investors. She also has significant experience with complex commercial litigation and consumer class actions. Her involvement in *In re Tyco International Ltd. Securities Litigation*, No. 02-1335, helped recover an aggregate settlement of $3.2 billion.

While at Rutgers University, Ms. Smith majored in French and was elected to *Phi Beta Kappa* and *Phi Sigma Iota*. As a graduate student, she studied French literature and film and spent a year in France working as an assistant English teacher. Ms. Smith taught French at Rutgers and at the University of Iowa before going to law school. During law school, Ms. Smith served as the Acquisitions Editor for the *Cornell Journal of Law and Public Policy* and was a member of the Cornell Moot Court Board. She also was active in a number of student organizations.

Prior to joining Milberg, Ms. Smith worked at large law firms in New York and New Jersey. She is admitted to practice in the United States District Courts for the Southern District of New York, the Eastern District of New York, the District of New Jersey, the District of Massachusetts, the District of Colorado, and the United States Courts of Appeals for the First, Second, Third, and Ninth Circuits.

ARVIND B. KHURANA received his B.A. from State University of New York at Albany in 1993, and a J.D. from St. John's University School of Law in 1999, *Dean's List Graduate*. While in law school, Mr. Khurana was on the Dean's List from 1995-1999 and a member of the *American Bankruptcy Institute Law Review*.

Mr. Khurana focuses his practice primarily on class actions on behalf of defrauded investors and consumers, as well as complex commercial litigation. Prior to joining Milberg in August 2005, Mr. Khurana worked as an associate with a major international law firm in New York, concentrating in the area of complex commercial litigation.

Mr. Khurana is a member of the Federal Bar Council and admitted to practice in the state and

federal courts of New York. He is also a member of the Firm's Diversity Committee.

KRISTI STAHNKE MCGREGOR received her B.A. degree in political science, *Phi Beta Kappa*, from the University of Florida in 1995. In 1999, Ms. McGregor received her J.D. degree from Emory University School of Law, where she was the Research Editor of the *Emory International Law Review* and student law clerk to Justice Norman Fletcher of the Georgia Supreme Court. In 2001, Ms. McGregor received her LL.M. degree from the Westfaelische Wilhelms-Universitaet Muenster, in Munester, Germany, where she was a Federal Chancellor Scholar through the Alexander von Humboldt Foundation.

For over a decade now, Ms. McGregor has focused her practice primarily on securities fraud class actions and derivative actions on behalf of investors, as well as other complex litigation involving allegations of fraud and/or breach of fiduciary duty. Working together with her colleagues at Milberg, Ms. McGregor's work has contributed to over $300 million in recoveries for investors.

Ms. McGregor has particular experience in international litigation, primarily involving European companies. She has used her German language skills and knowledge of the German legal system to represent investors in cases involving German companies, including In re Deutsche Telekom AG Securities Litigation, which resulted in a $120 million settlement for U.S. holders of American Depository Shares, and In re NYSE Euronext Shareholders Litigation challenging the proposed merger of the NYSE with the Deutsche Boerse.

Prior to joining Milberg's New York office in 2002, Ms. McGregor practiced in the international corporate law section of a large Atlanta law firm advising German companies on their business in the U.S. Ms. McGregor was admitted to the Georgia bar in 1999, the New York bar in 2003, and the Florida bar in 2004.

ANDREI RADO focuses his practice on securities litigation, consumer class actions, and SEC whistleblower matters.

Since the passage of the Dodd-Frank Act in 2010, Mr. Rado has represented numerous whistleblowers before the commission under a program that rewards and protects whistleblowers that report violations of securities laws to the Securities and Exchange Commission. These involved a variety of complaints, including allegations of bribing foreign officials to gain business, accounting fraud, and consumer fraud, against a variety of companies diverse in size and business.

Mr. Rado's securities practice has included numerous complex litigations nationwide, including *In re Initial Public Offering Securities Litigation*, which alleged, in hundreds of consolidated cases then pending in the Southern District of New York, that investment banks manipulated the initial public offerings of hundreds of companies, and mutual fund timing cases alleging that mutual fund managers allowed select investors to profit by improperly timing their trading in fund shares.

Mr. Rado also investigates, launches, and litigates consumer class actions. These cases are as diverse as consumer fraud itself. Early in his career, Mr. Rado litigated a case against jewelry company Zales for improperly denying credit-insurance claims made by unemployed and retired consumers, and a class action against computer maker Gateway for improperly understating in advertising the costs of internet access to consumers, some of whom incurred internet-access fees of hundreds of dollars. More recently, among other cases, Mr. Rado has launched and litigated consumer cases against companies that misled consumers by inflating the technical specifications of their products, and "all natural" food cases, including the first case alleging that products made from genetically modified organisms (GMOs) should not be advertised as natural.

Mr. Rado is editor of Milberg's consumer blog classactioncentral.com

Prior to joining Milberg, Mr. Rado worked as an attorney at a New York City-based investment bank focusing on compliance, with rules and regulations relating to re-sales of control and restricted securities under the Securities Act of 1933. Mr. Rado also worked at another prominent New York City law firm specializing in plaintiffs' securities class action litigation.

Mr. Rado received his Juris Doctor degree from St. John's University School of Law, *cum laude*, in 1999. While in law school, Mr. Rado served as a senior member of the *New York International Law Review*. He is admitted to practice in the courts of the State of New York, as well as the United States District Court for the Southern District of New York. Mr. Rado was born in Bucharest Romania, and lived in Israel for several years before immigrating to New York in the early 80s.

ANNA C. DOVER received a B.A. degree from Wesleyan University, with honors in Psychology, in 1995, and a J.D. degree from the University of California at Davis School of Law in 2001. While in law school, Ms. Dover was a member of the *UC Davis Law Review*.

Ms. Dover currently focuses her practice on representing whistleblowers in litigation under the False Claims Act. In addition, Ms. Dover has extensive experience litigating claims brought under Section 36(b) of the Investment Company Act of 1940, including taking such cases to trial. As an active member of the New York Inn of Court, she has spoken at several CLE seminars.

Prior to joining Milberg, Ms. Dover was an associate at Robie & Matthai, P.C. in Los Angeles where her practice was focused on insurance and legal malpractice claims. While in law school, Ms. Dover was a member of the UC Davis Law Review.

Ms. Dover is admitted to practice before the United States District Courts for the Southern District of New York and the Central and Southern Districts of California, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court.

PAUL F. NOVAK received his B.A. and M.A. degrees from Michigan State University in 1983, and J.D. from Emory University School of Law in 1986. Before leaving the firm, Mr. Novak was the head of Milberg's antitrust practice group and the managing partner of the Firm's Detroit office. He was active in a host of antitrust, securities, and consumer protection class action matters, and served as interim co-lead counsel in multiple antitrust cases.

Prior to joining Milberg, Mr. Novak practiced law in both the public sector, as an Assistant Attorney General for the State of Michigan and as the City Attorney of Lansing, and in the private sector consulting with clients on antitrust, environmental, and regulatory matters. As an assistant attorney general, Mr. Novak served as the Division Head of the Special Litigation Division with responsibility for antitrust enforcement, public utility matters, and securities litigation. He emerged as a national leader in multistate litigation involving pricing practices in the pharmaceuticals industry, and served as lead counsel on behalf of all fifty state attorneys general in the *In re Cardizem CD Antitrust Litigation*. He also served as lead counsel on behalf of the State of Michigan in several price fixing, monopolization, and merger cases in a broad spectrum of industries including health care, pharmaceuticals, and in cases involving Microsoft and Oracle Corporation.

Mr. Novak is the former Chair of the Michigan Bar Association's Antitrust, Franchising, and Trade Regulation Section and is a contributing editor of the American Bar Association's Antitrust and Health Care Newsletter. He is also a member of the State Bar of Michigan United States Court Committee. He was awarded the Frank J. Kelley Excellence in Trial Advocacy Award for his work in antitrust enforcement. He has lectured on antitrust issues in the pharmaceuticals and insurance industries for the Practicing Law Institute. He served as chair of the National Association of Attorneys General ("NAAG") Midwest Antitrust Enforcement Task Force and as a member of the NAAG Airlines Industry Working Group and Prescription Drug Pricing Task Force.

JAMES M. SHAUGHNESSY joined Milberg in 2001. He started his legal career as a litigation associate at Casey, Lane & Mittendorf in 1969 and became a litigation partner at the firm in 1976. In 1982, Mr. Shaughnessy co-founded the firm of Haythe & Curley, (now the New York office of Torys LLP) and was the firm's original litigation partner. He was the managing partner of Haythe & Curley for two years. In 1987, Mr. Shaughnessy joined the firm of Windels, Marx, Davies & Ives (now known as Windels, Marx, Lane & Mittendorf, LLP) as a litigation partner. He was the chairman of the Windels, Marx Litigation Department from 1988

through 1998, and was a member of the firm's Executive Committee from 1990 to 1992.

Over the course of his career, Mr. Shaughnessy has specialized in securities, insurance, aviation, bankruptcy, mass tort, and *qui tam* litigation. Mr. Shaughnessy was lead defense counsel for Pan American World Airways, Inc. in *In re Air Disaster at Lockerbie Scotland on December 21, 1988*, M.D.L. 799 (E.D.N.Y.), and tried the liability issues in that case on behalf of Pan Am to a jury for three months. More recently, Mr. Shaughnessy was Plaintiffs' Liaison Counsel in the Zyprexa mass tort litigation and was a member of the Plaintiffs' Steering Committee in the *Avandia* mass tort litigation.

Mr. Shaughnessy is a 1969 *cum laude* graduate of New York University School of Law where he was a member of the Order of the Coif, the Managing Director of the Moot Court Board, and a recipient of the Benjamin F. Butler Award upon graduation. Mr. Shaughnessy is admitted to practice in the States of New York, California, and New Jersey, as well as the United States Supreme Court and numerous other federal jurisdictions.

TODD KAMMERMAN focuses his practice on securities class action litigation, shareholder derivative litigation and commercial litigation. Mr. Kammerman's successful litigations include *In re CMS Energy Securities Litigation*, No. 02-72004 (E.D. Mich.) ($200 million recovery); *In re Royal Dutch/Shell Transport ERISA Litigation*, No. 04-1398 (D.N.J.) ($90 million recovery); *Scheiner v. i2 Technologies*, No. 01-0418 (N.D. Tex.) ($87.8 million recovery); *In re Collins & Aikman Corporation Securities Litigation*, No. 03-71173 (E.D. Mich.) ($10.8 million recovery), and *Mich II Holdings LLC v. Schron*, No. 600736/10 (Sup. Ct. N.Y. Cnty.) (represented certain defendants in connection with real estate dispute and successfully litigated motion to dismiss all claims against those defendants).

Mr. Kammerman played a pivotal role in the *In re Comverse Technology, Inc. Derivative Litigation*, No. 601272/06 (Sup. Ct. N.Y. Cnty.) ($62 million recovery), particularly in drafting the appellate briefs which led to the seminal New York Appellate Division opinion, reported at 56 A.D.3d 49 (1st Dept 2008), clarifying the standards of demand futility, and holding that a board of directors loses the protection of the business judgment rule where there is evidence of self-dealing and poor judgment by the directors. He was also a member of the team that litigated the appeal in *Tellabs, Inc. v. Makor Issues & Rights, Ltd.* before the United States Supreme Court, in which the Supreme Court issued an opinion defining the pleading standard for scienter in all federal securities fraud cases, and is reported at 551 U.S. 308 (2007).

While at Cardozo, Mr. Kammerman was named an Alexander Fellow, through which he worked as a judicial intern in the chambers of the Honorable Joseph A. Greenaway, Jr., United States District Judge in Newark, New Jersey. Mr. Kammerman is a member of the bars of the States of New York and New Jersey and is admitted to practice before the United States Courts of Appeals for the Third and Eleventh Circuits and the United States District Courts for the District of New Jersey, Southern and Eastern Districts of New York, and Eastern District of Michigan.

DAVID AZAR received his B.S. in Finance from Indiana University School of Business in 1991. He graduated from Duke University School of Law, *magna cum laude*, in 1999, where he was a member of the Order of the Coif (top 10% of the class). While in law school, he served as a senior editor of *Law and Contemporary Problems*, and was a member of the Moot Court Board. After law school, he clerked for Chief Justice Veasey of the Delaware Supreme Court.

Mr. Azar focuses his practice on class actions on behalf of defrauded investors and consumers, as well as disputes regarding contracts, partnerships, closely-held corporations, corporate governance, and other complex commercial matters for businesses and individuals. He also provides corporate counseling in pre-litigation and transactional matters, working with transactional or specialty counsel to provide a litigation perspective or to act as an outside general counsel.

Building upon his nine years of experience representing business enterprises and high-net-worth individuals at two of the most prominent business litigation firms, Mr. Azar has prosecuted several multiparty and other class actions that resulted in more than $300 million in settlements during the past two years alone. Recent significant settlements include obtaining total recovery for

investors of $219 million against Bank of New York Mellon and Wells Fargo in a securities fraud/breach of contract action, which reflected one of the largest recoveries against indenture trustees in United States history. In addition, Mr. Azar was part of the team that served as co-lead counsel in a class action resulting in $86 million in settlements on behalf of airline passengers who alleged that Korean Air Lines and Asiana Airlines conspired to fix the price of air travel between the United States and Korea. Mr. Azar's significant litigation experience includes first-chair trial and appellate work. He is also a contributing author of the *Antitrust Law Developments* (7th Edition), published by the ABA Section of Antitrust Law.

Mr. Azar serves as a volunteer prosecutor through the Los Angeles Bar Association's Trial Advocacy Project, and he has been named by *Los Angeles Magazine* as a Southern California Super Lawyers Rising Star. Mr. Azar has extensive knowledge of dispute resolution, having served as a mediator in more than 160 cases, and he has trained and reviewed other mediators. He served for five years as the editor of the quarterly publication of the Society of Professionals in Dispute Resolution, and was honored with the association's Presidential Recognition award.

PEGGY J. WEDGWORTH received a B.A. degree, in 1982 from Auburn University, and her J.D. degree from University of Alabama Law School in 1986. Ms. Wedgworth was an Assistant District Attorney in Brooklyn, New York from 1986 to 1989. Since leaving the public sector in 1989, she has handled various securities, commodities, and antitrust matters. She has litigated antitrust and commodities class actions on behalf of plaintiffs including extensive experience in all aspects of pre-trial and discovery in, among other cases, *In re Brand Name Prescription Drugs Antitrust Litigation*, No. 94-0897, 1996 WL 351180 (N.D. Ill. June 24, 1996) (approving $351 million settlement); *In re NASDAQ Market-Makers Antitrust Litigation*, 187 F.R.D. 465 (S.D.N.Y. 1998) ($1,027,000,000 settlement); *In re Microsoft Corp. Litigation*, MDL 1332 (D. Md.) (consolidated class actions alleging long term unlawful maintenance of a monopoly and other anticompetitive conduct by Microsoft resulting favorable partial settlements); *In re Soybean Futures Litigation*, No. 89-7009 (N.D. Ill.) ($21,500,000 class settlement providing claiming class members/soybean futures traders a full recovery under plaintiffs' expert's formula); *In re Sumitomo Copper Litigation*, 74 F. Supp. 2d 393, 395 (S.D.N.Y. 1999) ("The recovery is the largest class action recovery in the 75 plus year history of the Commodity Exchange Act."); *Kohen v. Pacific Investment Management Company, LLC*, No. 05-4681 (N.D. Ill.) (certified class of treasury bond futures purchasers alleging manipulation of the futures market); *Leider v. Ralfe*, No. 01-3137 (D.N.J.) (alleging price-fixing and monopolization in the diamond market by DeBeers resulting in a settlement of $250,000,000 and extensive injunctive relief), and *In re Natural Gas Commodities Litigation*, 03-6186 (S.D.N.Y.) ($101 million settlement). While a partner at her previous firm, she was involved in numerous antitrust cases including, *Air Cargo Shipping Services Antitrust Litigation*, *In re Digital Music Antitrust Litigation*, *In Re Chocolate Confectionary Antitrust Litigation*, *In re Aftermarket Filters Antitrust Litigation*, *In Re Rambus Antitrust Litigation*, and *In re Flash Memory Antitrust Litigation*. Ms. Wedgworth speaks on topics relating to antitrust litigation, most recently speaking to the New York State Bar, Antitrust Division in January 2008. She also has extensive experience in securities litigation including most recently *In re Initial Public Offering Securities Litigation*, which recently settled for $586 million.

While in law school, Ms. Wedgworth was a member of the Moot Court Board and served as Manager of the National Moot Court Team.

ROLAND RIGGS focuses his practice on representing whistleblowers under the False Claims Act and the Dodd-Frank Act. He has represented whistleblowers in a number of industries, including the health care, banking, pharmaceutical, finance, construction, and defense industries. Mr. Riggs also represents defrauded investors and consumers. Among other cases, he currently represents investors in *In re Merck & Co. Securities Litigation*, and *In re Oppenheimer Rochester Funds Group Securities Litigation*, and consumers in *The NVIDIA GPU Litigation*. Prior to joining Milberg LLP, Mr. Riggs worked at a boutique firm in New York practicing securities litigation. During law school, Mr. Riggs served as a clerk for one summer for the Honorable Alfred V. Covello of the United States District Court for the District of Connecticut. He later worked at McLaughlin & McCaffrey, LLP in Cleveland, Ohio in the areas of commercial

litigation and white collar criminal defense, and did pro bono corporate work representing charities at the Milton A. Kramer Law Clinic.

HENRY KELSTON received a B.S. degree, *cum laude*, from Tufts University in 1975, and a J.D. degree from New York University School of Law in 1978, where he was a member of the *Annual Survey of American Law*.

Mr. Kelston's practice is concentrated in the areas of complex litigation and electronic discovery. He has extensive experience in state and federal court litigation, administrative proceedings, and arbitrations. Mr. Kelston is a regular speaker and CLE presenter on electronic discovery. He is a member of The Sedona Conference® Working Group 1 on Electronic Document Retention and Production. Prior to joining Milberg, he practiced at Proskauer Rose in New York and Siegel, O'Connor & Kainen in Connecticut.

Mr. Kelston is admitted in the United States District Courts for the Southern and Eastern Districts of New York and the District of Connecticut.

OF COUNSEL

MICHAEL C. SPENCER graduated from Yale University in 1973 with a B.A. degree, *magna cum laude*, with distinction, in philosophy. While at Yale, he was elected to Phi Beta Kappa. Mr. Spencer received a J.D. degree from Harvard Law School, *cum laude*, in 1976.

Mr. Spencer has prosecuted a broad range of cases at Milberg LLP, with an emphasis on representing plaintiffs in class and other representative actions involving complex financial issues.

He was one of the principal trial counsel for plaintiffs in *In re Vivendi Universal, S.A. Securities Litigation* (S.D.N.Y.), a securities fraud class action in which the jury returned a verdict for the plaintiffs in January 2010. He is presently handling post-trial motions and defendant's anticipated appeal. The case is notable for the size of the verdict and for inclusion of investors from France, England, and the Netherlands, as well as the United States, in the certified class.

Mr. Spencer has handled many other securities cases at the Firm, including those against defendants in the fields of technology, real estate, finance, leasing, manufacturing, and pharmaceuticals. His first exposure to this type of case was in the precedent-setting "*WPPSS*" litigation in the late 1980s, which involved bond defaults on nuclear power plants in the Pacific Northwest and established the blueprint for prosecuting many complex securities class actions that followed.

Mr. Spencer has also led the Firm's prosecution of other cases in diverse fields. He was one of two principal trial counsel representing the FDIC in its year-long trial against a major accounting firm involving failed-bank audits, which led to a global settlement covering all government claims just before closing arguments to the jury. He has prosecuted consumer and securities claims against companies that sold deferred annuities unsuitable for retirement plan investors. He has taken appraisal and breach of fiduciary duty cases to trial in Delaware and Pennsylvania. He had extensive involvement in representing a coalition of union health care funds seeking to recover costs for treating smoking-related illnesses from the tobacco industry, pursuing the cases through several appeals. He has also represented plaintiffs in cases involving accounting malpractice, limited partnership investments, real estate closing fees and mortgage insurance, contract disputes, defamation, unlawful lotteries, and consumer deception.

Mr. Spencer began his legal career as a law clerk to U.S. District Judge Wm. Matthew Byrne Jr. in Los Angeles (1976-77). He then returned to New York and joined Cravath, Swaine & Moore as an associate, where he worked until 1986, when he joined Milberg as an associate and became a partner later that year. Mr. SPENCER graduated from Yale University in 1973 with a B.A. degree, magna cum laude, with distinction, in philosophy. While at Yale, he was elected to Phi Beta Kappa. Mr. Spencer received a J.D. degree from Harvard Law School, cum laude, in 1976.

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Mr. Spencer began his legal career as a law clerk to U.S. District Judge Wm. Matthew Byrne Jr. in Los Angeles (1976-77). He then returned to New York and joined Cravath, Swaine & Moore as an associate, where he worked until 1986, when he joined Milberg as an associate and became a partner later that year.

PAUL J. ANDREJKOVICS graduated from Union College, Schenectady, NY, in 1992, *Phi Beta Kappa*, *magna cum laude*, with a B.A. degree in political science. In 1995, Mr. Andrejkovics received his J.D. degree from Albany Law School.

Mr. Andrejkovics's practice concentrates on class action settlements and settlement administration. He was admitted as a member of the New York bar in 1996 and is admitted to practice before the United States District Court for the Northern, Southern, and Eastern Districts of New York.

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SENIOR COUNSEL

JENNIFER S. CZEISLER graduated from Hofstra University in 1994 with a B.A. degree in psychology. After completing graduate degree work at Hunter School of Social Work (1994-95), she pursued a J.D. degree, which she earned in 1999 from the University of Miami School of Law, where she graduated *cum laude*. Ms. Czeisler was on the editorial board of the *Law Review of Psychology, Public Policy & Law* and earned numerous awards, including the CALI excellence for the Future Award, Dean's Certificate of Achievement Award, and membership in the Phi Delta Phi National Honor Society.

Ms. Czeisler is admitted to practice in the State of New York and is a member of the American Bar Association, where she is committed to her *pro bono* work with the American Bar Association Commission on Legal Problems of the Elderly.

Mr. Levy is admitted to the state bars of New Jersey and New York, and is admitted to practice in the United States District Court for the Southern District of New York and the District of New Jersey

ELIZABETH MCKENNA focuses her practice primarily on antitrust litigation as well as on securities class action litigation on behalf of defrauded individuals and institutional investors. Prior to joining Milberg, Ms. McKenna was an associate in the New York office of Healy & Baillie, LLP (now part of Blank Rome LLP), where she practiced general commercial litigation. Ms. McKenna graduated from Fordham Law School in 1998. While at Fordham, she was a Stein Scholar in Public Interest Law & Ethics, a member of the *Fordham Environmental Law Journal*, and a Co-Director of the Fordham Student Sponsored Fellowship. Ms. McKenna is admitted to practice in the state courts of New York and in the United States District Courts for the Southern and Eastern Districts of New York.

CHARLES SLIDDERS received his L.L.B. from Melbourne University in 1994, with honors, and his L.L.M. from Monash University in 2002. Mr. Slidders is an experienced commercial litigator with almost fifteen years of litigation experience. Prior to joining Milberg in 2008, Mr. Slidders was the principal and founding partner of one of Melbourne, Australia's premier boutique commercial litigation firms. He has frequently appeared in Australia's mainstream media in relation to his legal work.

Mr. Slidders has significant experience in plaintiffs' and class action litigation. He has acted in a variety of matters involving Australia's antitrust (trade practices) laws, corporations law, and general business and property law.

Mr. Slidders has been influential in shaping the law in Australia. He precipitated the retrospective amendment of Victoria's domestic building laws after finding a loophole in the legislation that he successfully litigated before the Supreme Court of Victoria. He also initiated one of Australia's largest multiparty claims alleging breach of fiduciary duties by property developers.

Mr. Slidders' firm was preferred counsel for Victoria's farming community through the Victorian Farmers Federation - the body representing more than 20,000 Victorian farmers. He has acted in agribusiness matters involving trade practices issues against multinational grain trade companies (disputes involving hundreds of millions of dollars of derivative contracts on the CBOT). He has also advised shareholders in a derivative dispute with the management of one of Australia's leading egg wholesalers.

Mr. Slidders is admitted to the bar of New York and is admitted to practice law in Victoria, Australia.

ALASTAIR FINDEIS has extensive litigation experience, including representing accused infringers and healthcare purchasing entities in pharmaceutical patent and antitrust cases. He also has extensive experience representing whistleblowers in actions under the False Claims Act, including a significant role in the firm's *Mason v. Medline* case, which returned $85 million to the federal Treasury, including a $23.375 million (27.5%) share to the whistleblower.

Mr. Findeis leads Milberg's team in the representation of New York's Nassau County in *In re Pharmaceutical Industry Average Wholesale Price Litigation*, and is part of the team representing a class of end-purchasers in *In re Androgel Antitrust Litigation (II)*, currently on appeal in the U.S. Court of Appeals for the Eleventh Circuit. He has substantial courtroom experience in all phases of litigation and has successfully argued case-dispositive motions in state and federal courts, including sharing an oral argument with Professor Arthur Miller.

Mr. Findeis graduated from the Georgetown University Law Center in 2003 and has a BS in Biology (with Honors) from the Virginia Military Institute and an MS in Microbiology from the University of Virginia. After graduating from VMI, Mr. Findeis joined Britain's Royal Navy as a Sub-Lieutenant, graduating from the Britannia Royal Naval College and serving on *HMS London*.

Prior to joining Milberg, Mr. Findeis gained extensive experience in patent and other pharmaceutical litigation at Kenyon & Kenyon LLP and Cooley LLP.

Mr. Findeis is admitted to the bars of New York, the District of Columbia, California and Michigan.

ASSOCIATES

ANGELA G. BONGIORNO received her J.D. from Catholic University of Milan Law School in 2004 and her L.L.M. from Fordham University School of Law in 2008.

Ms. Bongiorno focuses her practice on mass torts, antitrust litigation, and institutional investor and client outreach. Prior to joining Milberg, she worked for an Italian law firm specializing in consumer law. Ms. Bongiorno also has conducted various research projects concerning the implementation of European Union regulations in Member States for the Italian Embassy of Malta and for Fondazione Rosselli, a think tank for Italian and European governmental bodies.

While in law school, Ms. Bongiorno interned with the Italian Embassy of Malta during Malta's accession to the European Union. She is fluent in Italian and conversant in Spanish.

Ms. Bongiorno is admitted to practice in the courts of the State of New York.

MELISSA R. CLARK focuses her practice on securities class actions and shareholder derivative and privacy litigation.

Prior to joining Milberg, Ms. Clark was an associate at a boutique firm in New York, where she was part of a securities litigation team that recovered several multimillion-dollar settlements on behalf of investors.

Her legal work experience also includes judicial externships with the Honorable Jerry Brown, Chief Judge of the United States Bankruptcy Court, Eastern District of Louisiana and the Honorable Jay C. Zainey of the United States District Court, Eastern District of Louisiana. In addition, Ms. Clark clerked for the San Francisco District Attorney's Office.

While at Tulane Law, Ms. Clark was a Senior Justice and Chairperson for the Moot Court Board and a Legal Research & Writing Senior Fellow. Ms. Clark also studied for one semester at UC Berkeley - Boalt Hall, where she received high honors in Securities & Class Action Litigation and was a visiting member of the *California Law Review*.

Ms. Clark is admitted to practice in the state of New York, as well as the United States District Courts for the Southern and Eastern Districts of New York. She is an active member of the New York City Bar Association, the Federal Bar Council, and the New York State Bar Association, where she serves on the Law, Youth & Citizenship Committee and Mock Trial subcommittee. Ms. Clark was recently recognized as a New York Super Lawyers "Rising Star."

DIANA GJONAJ focused her practice primarily on antitrust litigation, targeting illegal and anti-competitive practices on behalf of consumers and investors. She received her Bachelor Degree, *cum laude*, from the University of Michigan and her Juris Doctor from Wayne State University Law School. During law school, Ms. Gjonaj clerked for Milberg LLP in the Firm's Detroit office. Ms. Gjonaj is no longer with the firm.

Ms. Gjonaj is admitted to practice in the state courts of Michigan, the United States District Court for the Eastern District of Michigan and the United States Court of Appeals for the Sixth Circuit. She is a member of the American Bar Association, Women's Lawyer Association of Michigan, and Michigan Association for Justice.

ROLANDO G. MARQUEZ returns to Milberg as a member of its False Claims Act practice area and continues to represent private whistleblowers in sealed and unsealed actions brought pursuant to the federal False Claims Act (*qui tam* actions) as well as the parallel false claims statutes of various states.

Mr. Marquez's representative False Claims Act matters include *Mason v. Medline* (resulting in a recovery of $85 million for the United States in a non-intervened case arising from unlawful kickbacks, bribes, and other illegal remuneration to induce health care providers to continue to purchase defendant's medical supplies, including supplies paid for with government funds tainted by the kickbacks) and *United States ex rel. Marchese v. Cell Therapeutics, Inc.* (resulting in a $10.5 million recovery for the United States in

an intervened action arising from the unlawful off-label promotion of the cancer drug Trisenox).

From December 2012 to March 2014, Mr. Marquez was a Senior Litigation Counsel in a boutique New York class-action firm as a member of its False Claims Act practice group. Mr. Marquez was part of the co-counsel team that litigated one of the largest *qui tam* lawsuits ever to settle on a non-intervened basis against Omnicare, Inc., the nation's largest provider of pharmacy services to nursing home patients, and which returned $120 million to the United States Treasury to resolve kickback and false-claims allegations. In addition, Mr. Marquez represented a whistleblower in an action against a medical device manufacturer in which it sold products to the government that were made in countries not designated as trade partners of the United States in violation of the Trade Agreements Act.

Before he started in the False Claims Act arena, Mr. Marquez was part of the Milberg team that served as co-lead plaintiffs' counsel in *In re Tyco International, Ltd. Securities Litigation*, one of the largest securities fraud and accountant liability class action suits ever to settle, recovering over $3.2 billion for the company's injured shareholders.

Prior to joining Milberg initially, Mr. Marquez was an associate at a boutique New York patent firm, where he concentrated on patent litigation matters involving medical device, computer software, and consumer electronic device technologies.

Mr. Marquez received a B.S. degree from Brown University in 1994 and his M.S. degree from New York University in 1998. In 2003 he received his J.D. degree from Fordham University School of Law.

Mr. Marquez is admitted to practice in the state courts of New York as well as in the United States District Courts for the Southern and Eastern Districts of New York and the United States Patent and Trademark Office.

BIRT REYNOLDS represents defrauded consumers and investors in class actions. He also represents whistleblowers in False Claims Act litigation. Before joining Milberg, Mr. Reynolds clerked for a magistrate judge in the Middle District of Florida, as well as Florida appellate and trial court judges.

Mr. Reynolds graduated with a B.A. from the University of South Florida in 2000. In 2004, he earned his J.D. from Case Western Reserve University School of Law. Mr. Reynolds is admitted to practice in the state courts of Florida and New York.

CHRISTOPHER SCHUYLER focuses his practice on False Claims Act litigation, consumer class actions, and e-discovery.

Before joining Milberg, Mr. Schuyler clerked with the Fortune Society, a New York City non-profit organization focused on providing an alternative to incarceration for non-violent offenders. While in law school, he co-chaired a student organization promoting pro bono legal assistance to indigent members of the community, a role for which he was awarded a university scholarship for public service.

Mr. Schuyler graduated from Temple University, *cum laude*, with a B.A. degree in 2007. In 2011 he earned his J.D. degree from the University of Dayton School of Law. Mr. Schuyler is a member of the bar of the State of New York and is admitted to practice before the United States District Court for the Southern and Eastern Districts of New York.

ROY SHIMON focuses his practice on securities and stockholder derivative litigation, litigating cases in both state and federal courts. Mr. Shimon also has experience in the areas of insider trading and ERISA litigation. In 2014, *Super Lawyers* recognized him as a "Rising Star" in the New York Metro area.

Mr. Shimon was part of teams that recovered substantial benefits on behalf of stockholders and employee investors in *In re Popular Inc. ERISA Litigation* (D.P.R.) (settlement valued at $8.2 million) and *Shanehchian, et al. v. Macy's Inc.* (S.D. Ohio) (settlement valued at $8.5 million).

Mr. Shimon graduated with honors from Franklin & Marshall College in 2003, where he was inducted into the Pi Sigma Alpha and Alpha Kappa Delta National Honor Societies. He received his J.D. from St. John's University School of Law in 2006, where he served on the Executive Board of the Moot Court Honor Society and as Vice President of the Entertainment & Sports Law Society.

Mr. Shimon is admitted to practice in the state and federal courts of New York.

JOHN HUGHES focuses his practice on antitrust litigation, consumer protection, and e-discovery.

Mr. Hughes graduated from Michigan State University with a B.A. in Political Science in 2005.

In 2012, he earned his J.D. degree from Wayne State University School of Law.

During law school, Mr. Hughes served as Director of The Free Legal Aid Clinic in Detroit, Co-managing a facility that specializes in providing family and elder law services to city residents. Prior to joining Milberg, John helped lead a non-profit organization with a presence in New York City, Detroit, and Los Angeles that focused on providing support of creative communities.

Mr. Hughes is admitted to practice in Michigan.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT

TIME REPORT- MONTHLY

Firm Name: Milberg LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep
(P) Partner
(SC) Senior Counsel
(A) Associate
(CA) Contract Attorney
(FA) Financial Analyst
(INV) Investigator
(IAC) Investor Analysis & Class Communication
(DC) Document Clerk

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	Hourly Rate	Current Hours	Historical Amount	Cumulative Hours	Cumulative Historical
Novak, Paul F. (P)	0.00	0.00	0.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	$800	0.50	$400.00	0.50	$400.00
Gjonaj, Diana (A)	0.00	0.00	33.30	0.00	1.50	0.00	0.00	0.00	3.40	0.00	3.40	0.00	0.00	0.00	$350	41.60	$14,560.00	41.60	$14,560.00
SUB-TOTAL	**0.00**	**0.00**	**33.80**	**0.00**	**1.50**	**0.00**	**0.00**	**0.00**	**3.40**	**0.00**	**3.40**	**0.00**	**0.00**	**0.00**		**42.10**	**$14,960.00**	**42.10**	**$14,960.00**
NON-ATTORNEYS																			
Bricker, Halene (PL)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.70	0.00	0.00	0.00	$325	0.70	$227.50	0.70	$227.50
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.70**	**0.00**	**0.00**	**0.00**		**0.70**	**$227.50**	**0.70**	**$227.50**
GRAND TOTAL:	**0.00**	**0.00**	**33.80**	**0.00**	**1.50**	**0.00**	**0.00**	**0.00**	**3.40**	**0.00**	**4.10**	**0.00**	**0.00**	**0.00**		**42.80**	**$15,187.50**	**42.80**	**$15,187.50**

Case 4:13-md-02420-YGR Document 248-7 Filed 04/03/17 Page 1 of 1

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

MILBERG LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Novak, Paul F. (P)	04/23/15	$800.00
Gjonaj, Diana (A)	06/12/14 – 03/21/16	$350.00
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Bricker, Halene (Pl.)	09/24/14	$325.00

EXHIBIT D

(REDACTED)

Time Summary & Detail Report @ Current Rates — Milberg LLP — Page 1 (1)
Run Date: 05/23/17 — Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] — Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH

Accounts Receivable

Bill Number	Bill Date	Time Thru	Time Hours	Time Relieved	Disbursements Thru	Disbursements Relieved	Billed	Uncollected	Last Payment

Timekeeper No.	Timekeeper Name	Title	Latest Diary	Task Code	Unbilled Hours	Unbilled Rate	Unbilled Amount
01903	BRICKER, HALENE	PARALEGAL	03/11/16	11	0.70	325.00	227.50
01896	GJONAJ, DIANA	ASSOCIATE	03/21/16	11	3.40	350.00	1,190.00
	TOTAL 11				4.10		1,417.50
01896	GJONAJ, DIANA	ASSOCIATE	03/21/16	3	33.30	350.00	11,655.00
01212	NOVAK, PAUL F.	PARTNER	03/19/16	3	0.50	800.00	400.00
	TOTAL 3				33.80		12,055.00
01896	GJONAJ, DIANA	ASSOCIATE	03/21/16	5	1.50	350.00	525.00
	TOTAL 5				1.50		525.00
01896	GJONAJ, DIANA	ASSOCIATE	03/21/16	9	3.40	350.00	1,190.00
	TOTAL 9				3.40		1,190.00
	Total - Time				42.80		$15,187.50

TASK CODES

1 Investigations, Factual Research

2 Drafting Discovery Requests

3 Drafting Discovery Answers/Responses

4 Deposition Taking

5 Deposition Defending

6 Discovery Meet & Confer

7 Document Review

8 Drafting Pleadings, Briefs & Pretrial Motions

9 Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.

10 Class Certification/Experts

11 Litigation Strategy, Analysis & Case Management

12 Negotiating Settlements

13 Trial and Trial Preparation

14 Court Appearance and Prep

Run Date: 05/23/17 Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH

Disbursement Name		Amount
Network Printing	R0210	579.00
Legal Research	R0245	808.27
Total - Disbursements		$1,387.27

Time Summary & Detail Report @ Current Rates — Milberg LLP — Page 4 (4)
Run Date: 05/23/17 — Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] — Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH

Timekeeper Name	ID	Work Date	Time Description	Hours	Amount	Task Code	Batch Date	TimeCard Index No.
GJONAJ, DIANA	01896	06/12/14	Read & reviewed materials for Draft update letter and send to class reps	0.50	175.00	11	07/30/14	4680773
BRICKER, HALENE	01903	09/24/14	Review S. Williams' preservation declaration letter and current version of plaintiff questionnaire; identify additional information needed, if any, to complete current proposed class rep questionnaire.	0.70	227.50	11	09/29/14	4702127
GJONAJ, DIANA	01896	10/06/14	Call with P. Novak and co-counsel re: declaration of [redacted].	0.50	175.00	11	12/03/14	4713230
GJONAJ, DIANA	01896	10/07/14	Draft e-mail correspondence to class rep, Valentina [redacted]	0.50	175.00	11	12/03/14	4713246
GJONAJ, DIANA	01896	10/08/14	Call with class rep, [redacted]	0.20	70.00	11	12/03/14	4713247
GJONAJ, DIANA	01896	10/09/14	E-mail correspondence with [redacted] re: doc retention and declaration.	0.20	70.00	11	12/03/14	4713258
GJONAJ, DIANA	01896	03/12/16	Corres. w/ Krysta Pachman and Demetrius Lambrinos re: discovery issues	1.00	350.00	11	04/29/16	4782924
GJONAJ, DIANA	01896	03/21/16	[redacted]	0.50	175.00	11	04/29/16	4782973
			TOTAL - 11	4.10	$1,417.50			
NOVAK, PAUL F.	01212	04/23/15	Communications w/J. Prince and D. Gjonaj re call w/client to respond to discovery requests.	0.50	400.00	3	06/02/15	4742563
GJONAJ, DIANA	01896	04/24/15	Emails/calls re: [redacted] discovery responses.	2.00	700.00	3	06/09/15	4743539
GJONAJ, DIANA	01896	05/05/15	Call to client [redacted] re: discovery Response, draft email re: same.	0.40	140.00	3	06/25/15	4746289
GJONAJ, DIANA	01896	05/05/15	Email with Josh Prince Re: follow-up to discovery responses.	0.40	140.00	3	05/18/17	4818335
GJONAJ, DIANA	01896	05/09/15	Contact client [redacted] re: interrogatory response per David Young	0.50	175.00	3	06/25/15	4746298
GJONAJ, DIANA	01896	05/10/15	Review [redacted] interrogatory response	1.50	525.00	3	06/25/15	4746299

Time Summary & Detail Report @ Current Rates — Milberg LLP — Page 5 (5)
Run Date: 05/23/17 — Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] — Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH

Timekeeper Name	ID	Work Date	Time Description	Hours	Amount	Task Code	Batch Date	TimeCard Index No.
			drafted by David Young. Forward to Juncaj for confirmation and signature. Call with [redacted] re: same.					
GJONAJ, DIANA	01896	05/11/15	Contact with client re: interrogatory response. Call with David Young and correspondance with Josh Prince re same.	1.50	525.00	3	06/25/15	4746301
GJONAJ, DIANA	01896	05/12/15	Corres. With [redacted] re: verification	1.00	350.00	3	06/25/15	4746306
GJONAJ, DIANA	01896	06/08/15	Follow up regarding email from Josh Prince and class rep discovery.	2.00	700.00	3	08/24/15	4755396
GJONAJ, DIANA	01896	09/15/15	Follow-up with client regarding additional info for RFP's	1.50	525.00	3	11/02/15	4764670
GJONAJ, DIANA	01896	09/17/15	Call with client [redacted] to discuss supp. document production/ review same	1.50	525.00	3	11/02/15	4764749
GJONAJ, DIANA	01896	01/22/16	Meet with client regarding document production	3.00	1,050.00	3	03/08/16	4777834
GJONAJ, DIANA	01896	02/09/16	Pull and review all relevant documents for deposition prep.	2.50	875.00	3	05/18/17	4818336
GJONAJ, DIANA	01896	02/09/16	Contact with class representative [redacted] re deposition.	0.50	175.00	3	04/01/16	4780704
GJONAJ, DIANA	01896	02/11/16	Review Stipulated protective order.	0.50	175.00	3	04/01/16	4780710
GJONAJ, DIANA	01896	02/11/16	Email to [redacted] re stipulated protective order.	0.50	175.00	3	05/18/17	4818337
GJONAJ, DIANA	01896	02/11/16	Call with [redacted] to dicuss Protective order.	0.50	175.00	3	05/18/17	4818338
GJONAJ, DIANA	01896	02/12/16	Call with [redacted] re: additional document requests and clarification (1.00); follow up with Krysta (0.50)	1.50	525.00	3	04/01/16	4780713
GJONAJ, DIANA	01896	02/16/16	Review to protective order (0.40); follow up email with Krysta Pachman re: same (0.60)	1.00	350.00	3	04/01/16	4780716
GJONAJ, DIANA	01896	02/26/16	Follow-up with Krysta Pachman and client [redacted] re: discovery requests	2.00	700.00	3	04/01/16	4780733

Time Summary & Detail Report @ Current Rates — Milberg LLP — Page 6 (6)
Run Date: 05/23/17 — Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] — Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH

Timekeeper Name	ID	Work Date	Time Description	Hours	Amount	Task Code	Batch Date	TimeCard Index No.
			and clarification of earlier requests					
GJONAJ, DIANA	01896	03/07/16	Review supplemental rogs (2.00); discuss the same w. [redacted] (1.00)	3.00	1,050.00	3	04/29/16	4782910
GJONAJ, DIANA	01896	03/09/16	Call w/ [redacted] to discuss supplemental rog responses	1.00	350.00	3	04/29/16	4782917
GJONAJ, DIANA	01896	03/10/16	Correspondence with Krysta Pachman re: discovery and deposition dates.	1.00	350.00	3	04/29/16	4782920
GJONAJ, DIANA	01896	03/10/16	Pull/print corres. w/client for deposition prep.	2.00	700.00	3	05/18/17	4818339
GJONAJ, DIANA	01896	03/10/16	Call with v. [redacted] re: discovery and deposition dates.	1.00	350.00	3	05/18/17	4818340
GJONAJ, DIANA	01896	03/11/16	Correspondence with Krysta Pachman re: discovery and deposition dates.	1.00	350.00	3	04/29/16	4782922
			TOTAL - 3	33.80	$12,055.00			
3								
GJONAJ, DIANA	01896	03/15/16	Corres. w/ Krysta Pachman and [redacted] re: deposition	1.00	350.00	5	04/29/16	4782928
GJONAJ, DIANA	01896	03/17/16	Corres. w/ [redacted] re: deposition	0.50	175.00	5	04/29/16	4782969
			TOTAL - 5	1.50	$525.00			
5								
GJONAJ, DIANA	01896	09/24/14	Review new questioanaire vs last week (1.00); contact [redacted] re same (0.50)	1.50	525.00	9	11/10/14	4709462
GJONAJ, DIANA	01896	01/25/16	Review class cert briefing per P. Novak.	1.90	665.00	9	03/08/16	4777843
			TOTAL - 9	3.40	$1,190.00			
9								
			TOTAL - TIME	42.80	$15,187.50			

TASK CODES

Run Date: 05/23/17 Unbilled Time & Disbursements by Transaction Date From 06/01/2013 thru 02/28/2017
Client: 012167 [redacted] Proforma No: 130671
Matter: 012167-00001 LITHIUM ION BATTERY ANTITRUST
Billing Attorney: WEDGWORTH, PEGGY
Supervising Attorney: MCKENNA, ELIZABETH
==========

1 Investigations, Factual Research

2 Drafting Discovery Requests

3 Drafting Discovery Answers/Responses

4 Deposition Taking

5 Deposition Defending

6 Discovery Meet & Confer

7 Document Review

8 Drafting Pleadings, Briefs & Pretrial Motions

9 Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.

10 Class Certification/Experts

11 Litigation Strategy, Analysis & Case Management

12 Negotiating Settlements

13 Trial and Trial Preparation

14 Court Appearance and Prep

EXHIBIT E

NAME: Milberg LLP

PERIOD: June 1, 2013 thru February 28,2017

IN RE: LITHIUM ION BATTERIES INDIRECT EXPENSE REPORT

Description	DESCRIPTION (If necessary)	Prior Costs	Current Costs	Cumulative Costs
Litigation Assessment		$0.00	$0.00	$0.00
Court Costs		0.00	0.00	0.00
Experts/Consultants		0.00	0.00	0.00
Federal Express		0.00	0.00	0.00
Hearing Transcripts		0.00	0.00	0.00
Investigation		0.00	0.00	0.00
Lexis/Westlaw		0.00	808.27	808.27
Messenger/Delivery		0.00	0.00	0.00
Photocopies - In-House		0.00	579.00	579.00
Photocopies - Outside		0.00	0.00	0.00
Postage		0.00	0.00	0.00
Service of Process		0.00	0.00	0.00
Special Supplies		0.00	0.00	0.00
Telephone/telecopier		0.00	0.00	0.00
Travel		0.00	0.00	0.00
Miscellaneous		0.00	0.00	0.00
Total Expenses		**$0.00**	**$1,387.27**	**$1,387.27**

EXHIBIT 46

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF CRAIG NICHOLAS IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF NICHOLAS & TOMASEVIC, LLP**

I, Craig Nicholas, declare:

1. I am the managing partner of Nicholas & Tomasevic, LLP Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Bradley Van Patten and as counsel for IPPs throughout the course of this litigation. The background and experience of Nicholas & Tomasevic, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Nicholas & Tomasevic, LLP performed the following work:

a. Read and review pleadings and briefs;

b. Litigation strategy, analysis, and case management; and

c. Review settlement agreement.

5. Attached hereto as **Exhibit B** is a billing summary of Nicholas & Tomasevic LLP's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Thania Cuevas. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Nicholas & Tomasevic, LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Craig Nicholas in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys'

Fees and Reimbursement of Expenses on Behalf of Nicholas & Tomasevic, LLP and filed on May 26, 2017. (ECF No. 1813-29). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Nicholas & Tomasevic, LLP since June 1, 2013 was 75.4 with a corresponding lodestar of $17,984.00.

8. Attached hereto as **Exhibit D** is a summary of the expenses Nicholas & Tomasevic, LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. We expended a total of $106.84 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Nicholas & Tomasevic, LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. A compilation of these transactional records is attached hereto in **Exhibit E**. I have reviewed the time and expenses reported by Nicholas & Tomasevic, LLP in this case which are included in this declaration, and I affirm that they are true and accurate. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on April 18, 2019 at San Diego, CA 92101.

/s/ Craig Nicholas

Craig Nicholas

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

NICHOLAS & TOMASEVIC LLP

ATTORNEYS AT LAW

Tel: 619-325-0492
Fax: 619-325-0496

225 Broadway, 19th Floor
San Diego, CA 92101

I E E

Nicholas & Tomasevic, LLP represents businesses and individuals in litigation across a spectrum of specialized practice areas, including business contract, tort and other business-to-business disputes. We provide the personal service offered by small law firms with the legal skills and litigation experience found in a large firm, by providing the highest quality legal representation, outstanding client service and cost effective representation.

The cornerstone of our firm is providing excellent legal representation to our clients. Our attorneys thoroughly prepare from the outset to maximize our clients' results in trial or settlement. We pride ourselves on winning cases – it is our business. We are client service driven. We stay in close contact. Telephone calls are returned promptly. We keep clients fully informed of developments. Our goal is not only to win, but to do so with the least disruption possible to our clients' business.

Efficient, cost-effective representation is a priority. By understanding our clients' objectives, and working hard to achieve them, the firm delivers high quality services at an acceptable cost.

By meeting these objectives, we seek to develop long-term client relationships and to exceed expectations with creative problem solving, untiring responsiveness, and use of cutting-edge technology. These components, combined with effective advocacy and hard work, bring results that our clients value.

The experience of the lawyers at Nicholas & Tomasevic, LLP includes, but is not limited to, California Superior Court certification of class action cases for purposes of trial and for settlement in a variety of contexts, including unfair competition, false advertising, and wage and hour litigation. Nicholas & Tomasevic, LLP has played a leading role in shaping class action law in California by obtaining Ninth Circuit decisions affirming that class action waivers contained in consumer contracts are void as unconscionable under California law, which have been followed and cited throughout the country.

Representative cases handled by Nicholas & Tomasevic, LLP include:

i. *Laster v. T-Mobile* to represent a class of consumers who were charged sales tax on cellphones purchased as part of a "bundled" transaction. Nicholas & Tomasevic, LLP successfully argued both before the United States District Court and at the Ninth Circuit Court of Appeal that the waiver of class action rights is unconscionable under California law. N&T participated in the drafting of a United States Supreme Court certification petition opposition, requesting that the

Supreme Court deny certification, and prevailed on the certification issue at the United States Supreme Court.

ii. *Concepcion v. AT&T* to represent a class of consumers who were charged sales tax on cellphones advertised as "free." Nicholas & Tomasevic, LLP (formerly Nicholas & Butler, LLP) participated in the successful defeat of a "second generation" arbitration provision which denies class action rights but includes additional provisions that the cell phone carrier argued were not unconscionable. Again, Nicholas & Tomasevic, LLP was successful both at the District Court and Ninth Circuit Court of Appeal in confirming the unconscionability of the arbitration clause. The *Concepcion* decision by the Ninth Circuit was challenged by another United States Supreme Court certification petition and Nicholas & Tomasevic, LLP participated in the opposition to that certification petition, and the briefing of the merits once the U.S. Supreme Court took it up.

iii. *Loera v. Akal Security* to represent a class of approximately 350 guards who did not receive appropriate overtime, breaks, or meal periods in accordance with California law.

iv. *Cohen v. Robert Bosch Tools* to represent a class of consumers who purchased saws that were mislabeled as "Made in the USA."

v. *Nava v. Home Carpet Investment, Inc.* to represent a class of employees of Home Carpet who did not receive appropriate overtime, breaks, or meal periods in accordance with California law.

vi. *Maxwell v. Toys R Us* to represent a class of Toys R Us and Babies R Us customers for claims relating to Toys R Us's gift card program.

vii. *Moyle v. Liberty Mutual Insurance Company* to represent a non-opt out class of 1,166 employees seeking past service credits resulting from Liberty Mutual's purchase of Golden Eagle Insurance Company's assets through the rehabilitation process.

viii. *LaGuardia v. Allegro Towers* to represent four classes of current and former tenants who had their security deposits unlawfully withheld, and who were charged unlawful late and insufficient funds fees.

Craig M. Nicholas, Partner

Craig M. Nicholas is a founding partner in the law firm of Nicholas & Tomasevic LLP. In 2009, *The San Diego Daily Transcript* identified Mr. Nicholas as one of the top 25 corporate litigators in San Diego County. *SuperLawyers* magazine twice selected Mr. Nicholas as one of the top attorneys in California - for 2008 and 2009. Only five percent of the lawyers in California are named by *SuperLawyers*. In April 2009, the Litigation Counsel of America Trial Lawyer Honor Society invited Mr. Nicholas to become a Fellow, an honor bestowed on less than one-half of one percent of American lawyers.

Mr. Nicholas is a leader in the San Diego litigation community. He has served on the Executive Board of Directors of the William Enright Chapter of the American Inns of Court. Mr. Nicholas was an Associate with the Louis Welsh Chapter of the American Inns of Court in 2001. Mr. Nicholas is a former President and a member of the Board of Directors of the State Bar of California Young Lawyers Division.

Mr. Nicholas received his Juris Doctor in 1995 with *cum laude* honors from the University of Arizona College of Law, where he served as a member of the National Moot Court team and Note & Comment Editor of the Arizona Journal of International and Comparative Law. He completed his undergraduate education at the University of California at San Diego, where he graduated *cum laude* with a BA in political science in 1992. Mr. Nicholas was a partner at the antitrust and business litigation law firm of Wright & L'Estrange from 2002-2004.

Mr. Nicholas has significant experience in complex litigation in state and federal court, including business disputes, officer and director liability, class action consumer rights, real estate and employment litigation. He has been a member of the San Diego County Bar Association, American Business Trial Lawyers Association San Diego Chapter, and the Federal Bar Association. Mr. Nicholas is admitted to practice before all California state courts and the United States District Courts in the Southern and Central Districts of California.

Alex Tomasevic, Partner

Mr. Tomasevic joined Nicholas & Tomasevic, LLP in 2006. Mr. Tomasevic's practice areas include consumer and employment class actions, business and employment litigation, arbitration, and appeals. Mr. Tomasevic's significant experience includes representing both individuals and large and small businesses in front of state and federal trial courts, and state and federal appellate courts. He has extensive experience in all phases of civil litigation including discovery, trials, arbitrations, settlement negotiations, and appeals.

Before joining the firm, Mr. Tomasevic gained criminal law and oral advocacy experience with the San Diego County Office of the Alternate Public Defender. While pursuing his Juris Doctorate, Mr. Tomasevic also served as a paid research assistant to University of San Diego professor Lynne L. Dallas where he researched and wrote on topics including law and economics, corporate governance and litigation, securities regulation, and international trade.

Mr. Tomasevic received his Juris Doctorate in 2006, *cum laude*, from the University Of San Diego School Of Law where he was a recipient of the Warren Family Scholarship. Mr. Tomasevic competed extensively in Moot Court and Mock Trial competitions garnering several semi-finalist and finalist honors including a First Place finish in the 2004 "ATLA Inter-School Mock Trial Tournament" between University of San Diego, Thomas Jefferson, and California Western law schools. Mr. Tomasevic also received highest grade distinction in 2004 in his class on "International Litigation and Arbitration."

Mr. Tomasevic is admitted to practice before all of the California state trial and appellate courts, the United States District Court for the Southern, Central, Eastern, and Northern Districts of California; the United States Court of Appeals for the Ninth Circuit; and the United States Supreme Court. He is a member of the San Diego County Bar Association and its Litigation Section.

Shaun Markley, Associate

Shaun Markley is an Associate Attorney with Nicholas & Tomasevic LLP. He represents both defendants and plaintiffs in business disputes, employment cases, insurance coverage claims, and complex class actions.

Prior to joining the firm, Mr. Markley gained substantial experience in all phases of litigation. He drafted and argued a variety of successful motions, eliminating potential liability faced by health care clients. Shaun also worked with businesses to obtain insurance coverage for litigation matters, in particular, those involving intellectual property rights.

Mr. Markley graduated from The Ohio State University's Moritz College of Law. While at Ohio State, Mr. Markley was an Academic Merit Scholar and received the CALI Award for Excellence in Professional Responsibility. Prior to attending law school, Mr. Markley double majored in Political Science as well as Criminology, Law, and Society at University of California, Irvine.

Jake Schulte, Associate

Jake W. Schulte joined Nicholas & Tomasevic as an associate in 2018. Jake focuses his practice on the business litigation and class action matters.

In 2009, Jake received his B.B.A. from the University of San Diego. In 2013, Jake earned his J.D. from California Western School of Law.

Jake also serves on the Board of Directors of the California Western School of Law Alumni Association.

Ethan Litney, Associate

Mr. Litney attended UC Davis School of Law. While in law school, he received the Witkin Award for Academic Excellence, and was recognized as being part of the Public Service Law Program and Pro Bono Program for his volunteer work while in law school. Mr. Litney has been practicing law in California since 2014.

Previously, Ethan Litney was an associate at Casey Gerry Shenck Francavilla Blatt & Penfield, LLP, where he represented plaintiffs in state and federal courts in numerous class action, complex, and multi-district litigation matters primarily in the area of consumer protection. Mr. Litney also has significant experience in the areas of class action employment, antitrust, oil & gas, civil RICO, and environmental litigation.

EXHIBIT B

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TT E															T T H	C E T H TE	T T DE T
(P) Craig Nicholas															0.00	$650.00	$0.00
(P) Alex Tomasevic															0.00	$550.00	$0.00
(A) Lacy Wells											0.40				0.40	$375.00	$150.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
B T T																	
TT E																	
Sarah Fan (PL)											56.20				56.20	$195.00	$10,959.00
Emilia Carrillo (PL)											8.40				8.40	$195.00	$1,638.00
															0.00	$185.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
B T T																	
D T T																	

EXHIBIT C

Selection Criteria

Slip.Transaction Date	3/1/2017 - 4/1/2019
Clie.Selection	Include: Van Patten v. Panasonic Corp.
Slip.Classification	□pen

Rate Info - identifies rate source and level

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
170104	TIME	Paralegal 1 - EC	0.20	195.00	39.00
3/1/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process multiple Transcript □rders.					
170107	TIME	Paralegal 1 - EC	0.20	195.00	39.00
3/1/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process Joint Status Report re Discovery of Sales and Costs Data.					
170125	TIME	Paralegal 2 - AM	0.40	195.00	78.00
3/1/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process Transcript □rders (x5).					
170300	TIME	Paralegal 2 - AM	0.20	195.00	39.00
3/3/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process Response to □rder and Joint Letter Brief. Circulate to case team.					
170405	TIME	Paralegal 1 - EC	0.20	195.00	39.00
3/7/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process Defendant's motion for telephonic appearance.					
170586	TIME	Paralegal 2 - AM	0.20	195.00	39.00
3/8/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process □rder granting Motion to Appear by Telephone. Circulate to case team.					
170587	TIME	Paralegal 2 - AM	0.20	195.00	39.00
3/8/2017		Paralegal Time	0.00	T@3	
WIP		Van Patten v. Panasoni			
Analyze and process □rder re Filing of Joint Case					

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
Management Statements. Circulate to case team.					
170663 3/9/2017 WIP Analyze and process Administrative Motion for Leave to File Supplemental Memorandum.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170666 3/9/2017 WIP Analyze and process Supplemental Brief re Motion for Preliminary Approval of Class Action Settlement.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170668 3/9/2017 WIP Analyze and process □rder/Mandate of USCA as to Notice of Appeal.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170672 3/9/2017 WIP Analyze and proces □rder by Judge re Discovery Letter Brief.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170684 3/9/2017 WIP Analyze and process administrative motion for leave to file supplemental memorandum by LG Chem America.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170743 3/10/2017 WIP Analyze and process clerk's notice vacating further motion hearing on settlement approval. Analyze and process Reply on Motion to Dismiss Flextronics's Amended Complaint.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
170807 3/13/2017 WIP Analyze and process substitution of counsel by Gordon Fauth.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
171232 3/20/2017 WIP Analyze and process miscellaneous filings via CM/ECF. (x8)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
171555 3/23/2017 WIP Analyze and process stipulated protective order re Canon USA.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
171593 3/24/2017 WIP Analyze and process joint management statement by Dell, Inc. and Dell Products.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
171628 3/24/2017 WIP Analyze and process miscellaneous filings via CM/ECF (x5).	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
171757 3/27/2017 WIP Analyze and process miscellaneous filings from CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
172564 4/27/2017 WIP Update summary spreadsheets pursuant to lead counsel's instructions; email same.	TIME	Lacy Wells Attorney Time Van Patten v. Panasoni	0.40 0.00	375.00 T@18	150.00
172678 4/3/2017 WIP Analyze and process Stipulation with Proposed □rder re Production of Email Addresses by □ffice Depot, via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
172726 4/4/2017 WIP Analyze and process Stipulation and □rder re Production of Email Addresses by Home Depot, via	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
CM/ECF.					
172930 4/7/2017 WIP Analyze and process Notice of Chance in Counsel.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
172939 4/7/2017 WIP Analyze and process Notice of Withdrawal of Arin C. Aragona as Counsel.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173031 4/10/2017 WIP Analyze and process notice of transcript availability, served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173077 4/11/2017 WIP Analyze and process Pro Hac Vice Application by Samsung SDI.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173123 4/12/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173152 4/13/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173213 4/14/2017 WIP Analyze and process miscellaneous filings from CM/ECF system.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173254 4/17/2017 WIP Analyze and process miscellaneous filings via CM/ECF system.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
173347 4/18/2017 WIP Coordinate deadline to submit time and expenses to co-lead-counsel.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173529 4/21/2017 WIP Analyze and process □rder Setting Status Conference. Circulate to case team. Coordinate continued Status Conference and attendant deadlines. Circulate to case team.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173645 4/24/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173690 4/25/2017 WIP Analyze and process objections to proposed class action settlement.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173717 4/25/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173739 4/26/2017 WIP Analyze and process orders of transcript proceedings (x4).	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173768 4/26/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
173839 4/27/2017 WIP Analyze and process miscellaneous filings served	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
via CM/ECF. (x3)					
174070 5/1/2017 WIP Analyze and process court orders granting pro hac vice applications and motion to extend time.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174248 5/3/2017 WIP Analyze and process transcript of proceedings orders by LG Chem America and Indirect Purchaser Plaintiffs.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174288 5/4/2017 WIP Analyze and process notice of withdrawal of counsel by Samsung SDI.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174347 5/4/2017 WIP Analyze and process Redaction to □rder on Administrative Motion by IP Plaintiffs.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.40 0.00	195.00 T@3	78.00
174430 5/5/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174528 5/9/2017 WIP Analyze and process direct purchaser plaintiff's motion for class certification, and declarations in support thereof.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174584 5/9/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
174837 5/12/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
174945 5/15/2017 WIP Analyze and process Notice of Change in Counsel.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175038 5/16/2017 WIP Review time and expense records. Draft declaration of Craig Nicholas in support of cost summary. Forward to attorney for approval.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.40 0.00	195.00 T@3	78.00
175039 5/16/2017 WIP Analyze and process Stipulation with Proposed □rder re Production of Email Addresses.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175042 5/16/2017 WIP Prepare final copies of [redacted] and [redacted]. Forward to [redacted] for [redacted]. Email [redacted] to lead counsel.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175122 5/17/2017 WIP Prepare and update CV for Nicholas & Tomasevic. Forward to attorney for approval.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.80 0.00	195.00 T@3	156.00
175124 5/17/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175184 5/18/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
175206 5/18/2017 WIP Draft [redacted] per lead counsel's instructions. Forward to [redacted] for review.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175207 5/18/2017 WIP Prepare Exhibit B, and calculations of [redacted].	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175252 5/19/2017 WIP Email to lead counsel re [redacted].	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175267 5/19/2017 WIP Analyze and process Letter from Blake McKinley, served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175360 5/22/2017 WIP Analyze and process □rder Denying Administrative Motion to Submit Detailed Time and Expense Records in Camera.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175532 5/24/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175632 5/25/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175662 5/26/2017 WIP Analyze and process □rder granting stipulation re Defendant's answer to Flextronics' first amended	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
complaint.					
175693 5/26/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175788 5/30/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.40 0.00	195.00 T@3	78.00
175805 5/31/2017 WIP Analyze and process NEC Tokin's answer to TracFone's first amended complaint.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
175875 5/31/2017 WIP Analyze and process miscellaneous filing served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176028 6/1/2017 WIP Analyze and process Stipulation with Proposed □rder compelling arbitration.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176085 6/2/2017 WIP Analyze and process Toshiba's Answer to Flextronics' Complaint.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176141 6/5/2017 WIP Analyze and process Sony's answer to Flextronics' amended complaint.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176279 6/6/2017 WIP Analyze and process miscellaneous filings served	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
via CM/ECF system.					
176356 6/7/2017 WIP Analyze and process Administrative Motion to Amend Schedule and Notice for Settlements with certain defendants.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176390 6/8/2017 WIP Analyze and process order dismissing appeal for failure to prosecute.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176456 6/8/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176499 6/9/2017 WIP Analyze and process Notice Setting Fairness Hearing. Coordinate hearing date; circulate to case team.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
176555 6/12/2017 WIP Analyze and process Court notice setting hearing for motion for attorney fees to the same date as the fairness hearing.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177047 6/20/2017 WIP Analyze and process Discovery Letter Brief re Subpoena to Simplo Technology.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177137 6/22/2017 WIP Analyze and process TrancFone's notice of voluntary dismissal with prejudice re Samsung.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
177181 6/22/2017 WIP Analyze Notice of Voluntary Dismissal with Prejudice re Samsung.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177258 6/23/2017 WIP Analyze and process □rder granting Voluntary Dismissal with Prejudice of Claims against Samsung.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177268 6/23/2017 WIP Analyze and process Proposed □rder re □rder on Motion for Issuance of Letters Rogatory.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177351 6/26/2017 WIP Analyze and process □bjections to the terms of the settlement.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177438 6/27/2017 WIP Analyze and process □bjections to the terms of settlement filed by William Yoes.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177504 6/28/2017 WIP Analyze and process Notice of hearing on Joint Discovery Letter. Coordinate discovery hearing; circulate to case team.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177510 6/28/2017 WIP Analyze and process Request for International Judicial Assistance re Hee Joung Moon.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177560 6/29/2017 WIP Analyze and process Indirect Purchaser Plaintiffs	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
motion for issuance of letters rogatory.					
177561 6/29/2017 WIP Analyze and process Indirect Purchaser Plaintiffs administrative motion to file under seal.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177641 6/30/2017 WIP Analyze and process Maxell Corporation of America's answer to Flextronics' first amended complaint.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177642 6/30/2017 WIP Analyze and process Hitachi Maxell's answer to Flextronics' first amended complaint.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177657 6/30/2017 WIP Analyze and process Court order re setting hearing/briefing schedule re Indirect Purchaser Plaintiffs' motion for issuance of letters rogatory.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
177694 6/30/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178109 7/5/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178286 7/10/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
178424 7/12/2017 WIP Analyze and process Notice of Intent to Serve Subpoena.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178436 7/12/2017 WIP Analyze and process Application to Appear Pro Hac Vice filed by Tompkins.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178545 7/14/2017 WIP Analyze and process court order re pro hac vice application of Charles Tompkins.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178572 7/14/2017 WIP Analyze and process notice of voluntary dismissal re Samsung.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178721 7/18/2017 WIP Analyze and process court order granting motion for issuance of letter rogatory.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178722 7/18/2017 WIP Analyze and process request for international judicial assistance.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178777 7/18/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
178865 7/19/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
178968 7/20/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179010 7/21/2017 WIP Analyze and process □rder re filing joint case management statements is tag-along causes.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179013 7/21/2017 WIP Analyze and process exhibit 3 to indirect-purchaser plaintiffs' issuance of letters rogatory.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179026 7/21/2017 WIP Analyze and process letter from William Yoes re withdrawal of objection.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179073 7/21/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179183 7/24/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179217 7/25/2017 WIP Analyze and process Direct Purchaser Plaintiffs' motion in support of final approval of class action re settlement with Maxell, NEC, Panasonic, and Toshiba.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179253 7/25/2017 WIP Analyze and process miscellaneous filings served	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
via CM/ECF.					
179414 7/27/2017 WIP Analyze and process miscellaneous filing served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179441 7/28/2017 WIP Analyze and process notice of voluntary dismissal of claims re Yuasa Corporation.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
179555 7/31/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x6)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
180004 8/3/2017 WIP Analyze and process Fourth Supplement to □bjection filed by Christopher Andrews.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
180357 8/9/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
180451 8/10/2017 WIP Motion to Intervene filed by Frederick Banks.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
180452 8/10/2017 WIP Draft deposition for RMG Sunset's PMK. Forward to attorney for approval.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.40 0.00	195.00 T@3	78.00
180703 8/15/2017 WIP Analyze and process stipulation and proposed order re dismissal of Toshiba Corporation by Dell, Inc.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
180797 8/16/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
180919 8/17/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2).	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181077 8/21/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181136 8/22/2017 WIP Analyze and process class member Gordon Morgan's objection to LG Chem, et al. settlement.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181175 8/22/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181274 8/23/2017 WIP Analyze and process Transcript □rder by Panasonic.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181341 8/24/2017 WIP Analyze and process Indirect Purchase Plaintiffs opposition to Banks motion to intervene.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181564 8/29/2017 WIP Analyze and process Court minute entry re fairness hearing.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
181604 8/29/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
181679 8/30/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182016 9/1/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182023 9/1/2017 WIP Analyze and process transcript order by Samsung SDI America, Inc. and Samsung SDI Co. Ltd.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182037 9/5/2017 WIP Analyze and process stipulation and proposed order reproduction of certain expert material filed by Panasonic.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182081 9/5/2017 WIP Analyze and process order granting final approval of class action settlement with NEC.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182082 9/5/2017 WIP Analyze and process order granting final approval of class action settlement with NEC.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182100 9/5/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
182526 9/12/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182613 9/13/2017 WIP Analyze and process Court order granting stipulation re scheduling of renewed class certification.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
182654 9/14/2017 WIP Analyze and process joint discovery letter brief.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
183003 9/20/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
183291 9/26/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
183369 9/27/2017 WIP Analyze and process conformed miscellaneous filings served via CM/ECF system.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
183850 10/2/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
183921 10/3/2017 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
184000 10/4/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. Circulate to case team. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184081 10/5/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184150 10/6/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184234 10/9/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184345 10/11/2017 WIP Analyze and process miscellaneous notifications served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184421 10/12/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184471 10/13/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184501 10/13/2017 WIP Analyze and process Transcript □rder for proceedings held on □ctober 3, 2017.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
184576 10/16/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184591 10/17/2017 WIP Analyze and process supplemental brief from indirect purchaser plaintiff's re final approval and motion for attorney's fees.	TIME	Paralegal 1 - EC Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184740 10/18/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184806 10/19/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
184985 10/23/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
185136 10/25/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x6)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
185275 10/27/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
185320 10/30/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
185449 10/31/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
185749 11/1/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
185965 11/6/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186036 11/7/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186139 11/8/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186237 11/9/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186315 11/10/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186443 11/13/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
186571 11/15/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186677 11/16/2017 WIP Analyze and process miscellaneous filings served via CM/ECF.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186722 11/17/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186805 11/20/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186879 11/21/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
186937 11/22/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x14)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.40 0.00	195.00 T@3	78.00
187052 11/27/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
187157 11/28/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x11)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
187529 12/1/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
187607 12/4/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x6)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
187686 12/5/2017 WIP Analyze and process miscellaneous filings forwarded via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
187905 12/8/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188005 12/11/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188131 12/13/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188268 12/15/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188333 12/18/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
188434 12/19/2017 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188586 12/21/2017 WIP Analyze and process miscellaneous filing served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
188629 12/22/2017 WIP Analyze and process miscellaneous filings served via CM/ECF (x2).	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
189061 1/3/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
189207 1/5/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x12)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
189319 1/8/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
189383 1/9/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
189590 1/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
189865 1/18/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190031 1/22/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190137 1/23/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x6)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190315 1/25/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190391 1/26/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190501 1/29/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190610 1/30/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
190977 2/1/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
191458 2/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
191883 2/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
192017 2/21/2018 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
192082 2/22/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
192231 2/26/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
192703 3/2/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
192798 3/5/2018 WIP Analyze and process miscellaneous filings. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193003 3/8/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
193095 3/9/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193187 3/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193248 3/13/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193329 3/14/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193426 3/15/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193498 3/16/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193585 3/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193637 3/20/2018 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
193690 3/21/2018 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193759 3/22/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193826 3/23/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x8)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@18	39.00
193827 3/23/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x8)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193905 3/26/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
193977 3/27/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
194029 3/28/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
194095 3/29/2018 WIP Analyze and process miscellaneous filings served via CM/ECF system. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
194151 3/30/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
194554 4/4/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
194918 4/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195039 4/16/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195114 4/17/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195163 4/18/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195245 4/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195312 4/20/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
195591 4/27/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
195982 5/2/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196040 5/3/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196097 5/4/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x7)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196256 5/9/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196294 5/10/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196354 5/11/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196386 5/14/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
196435 5/15/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196504 5/16/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196546 5/17/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196601 5/18/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196663 5/21/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196778 5/23/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
196984 5/30/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
197052 5/31/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
197426 6/5/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
197619 6/8/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
197696 6/11/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
197913 6/14/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
197961 6/15/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
198029 6/18/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
198084 6/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
198528 6/28/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
199034 7/6/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199148 7/10/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199218 7/11/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199396 7/16/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199476 7/17/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199608 7/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199667 7/20/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
199942 7/27/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
200044 7/31/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
200352 8/3/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
200687 8/13/2018 WIP Analyze and process miscellaneous filings filed via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
200774 8/14/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
200823 8/15/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201007 8/20/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201115 8/22/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201179 8/23/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
201249 8/25/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201451 8/29/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201517 8/30/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201579 8/31/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
201836 9/4/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
202293 9/14/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x4)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
202432 9/19/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203154 10/1/2018 WIP (Appeal) Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
203171 10/1/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203268 10/3/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203400 10/5/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203493 10/8/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203599 10/10/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203720 10/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203837 10/16/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
203922 10/17/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
204196 10/24/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
204399 10/29/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
204545 10/31/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
204918 11/5/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
205005 11/7/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
205150 11/12/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
205431 11/20/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
205623 11/27/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
205767 11/30/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
206200 12/31/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
206316 12/10/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
206792 12/31/2018 WIP Analyze and process miscellaneous appellate filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
206918 12/13/2018 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
207335 1/18/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
207360 1/22/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
207617 1/29/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
207751 1/28/2019 WIP Analyze and process miscellaneous filings served via CM/ECF in appeal case.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
207925 1/23/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x2)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
207974 1/11/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
208023 1/24/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
208176 1/16/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
208225 1/30/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
208673 1/15/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
208854 2/21/2019 WIP Analyze and process notice of consideration for oral argument by appellate court.	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description		Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
208889 2/20/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
209075 2/26/2019 WIP Analyze and process miscellaneous appellate filings served via CM/ECF. (x3)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
209559 2/14/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
209575 2/19/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
210091 2/8/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
211028 3/5/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
211217 3/7/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x5)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00
211219 3/8/2019 WIP Analyze and process miscellaneous filings served via CM/ECF. (x1)	TIME	Paralegal 2 - AM Paralegal Time Van Patten v. Panasoni	0.20 0.00	195.00 T@3	39.00

Slip ID / Dates and Time / Posting Status / Description	Timekeeper / Activity / Client / Reference	Units / DNB Time	Rate / Rate Info / Bill Status	Slip Value
Grand Total				
	Billable	65.00		12747.00
	Unbillable	0.00		0.00
	Total	65.00		12747.00

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
NICHOLAS & TOMASEVIC, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	$0.00
Litigation Assessment	$0.00
Court Fees (Filing, etc.)	$0.00
Document Production	$0.00
Experts/Consultants	$0.00
Federal Express	$0.00
Transcripts (Hearing, Deposition, etc.)	$0.00
Investigation	$0.00
Lexis/Westlaw	$97.84
Messenger/Delivery	$0.00
Photocopies – In House (capped at $0.20 per copy)	$6.30
Photocopies – Outside	$0.00
Postage	$2.70
Service of Process	$0.00
Supplies	$0.00
Telephone/Telecopier	$0.00
Travel	$0.00
Miscellaneous	$0.00
TOTAL:	$106.84

EXHIBIT 47

Counsel for Indirect Purchaser Plaintiffs

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

MDL NO. 2420

DEC TI C I ICH I T I DI ECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' EE D EI B E E T EX E E BEH ICH T E IC

I, Craig M. Nicholas, declare:

1. I am a founding partner of Nicholas & Tomasevic, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Bradley Van Patten and as counsel for IPPs throughout the course of this litigation. The background and experience of Nicholas & Tomasevic, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **E**.

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

4. During the pendency of the litigation, Nicholas & Tomasevic, LLP performed the following work:

a. Read and review pleadings and briefs;

b. Litigation strategy, analysis, and case management; and

c. Review settlement agreement.

5. Attached hereto as **E B** is a billing summary of Nicholas & Tomasevic, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Nicholas & Tomasevic, LLP during this period of time was 10.40, with a corresponding lodestar based on current rates of $5,237.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Nicholas & Tomasevic, LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Nicholas & Tomasevic, LLP has incurred during the course of this litigation. Nicholas & Tomasevic, LLP expended a total of $106.84 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Nicholas & Tomasevic, LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Nicholas & Tomasevic, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017, at San Diego, California.

/s/ Craig M. Nicholas

Craig M. Nicholas

TTE T TI

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

NICHOLAS & TOMASEVIC LLP

ATTORNEYS AT LAW

Tel: 619-325-0492
Fax: 619-325-0496

225 Broadway, 19th Floor
San Diego, CA 92101

I E E

Nicholas & Tomasevic, LLP represents businesses and individuals in litigation across a spectrum of specialized practice areas, including business contract, tort and other business-to-business disputes. We provide the personal service offered by small law firms with the legal skills and litigation experience found in a large firm, by providing the highest quality legal representation, outstanding client service and cost effective representation.

The cornerstone of our firm is providing excellent legal representation to our clients. Our attorneys thoroughly prepare from the outset to maximize our clients' results in trial or settlement. We pride ourselves on winning cases – it is our business. We are client service driven. We stay in close contact. Telephone calls are returned promptly. We keep clients fully informed of developments. Our goal is not only to win, but to do so with the least disruption possible to our clients' business.

Efficient, cost-effective representation is a priority. By understanding our clients' objectives, and working hard to achieve them, the firm delivers high quality services at an acceptable cost.

By meeting these objectives, we seek to develop long-term client relationships and to exceed expectations with creative problem solving, untiring responsiveness, and use of cutting-edge technology. These components, combined with effective advocacy and hard work, bring results that our clients value.

The experience of the lawyers at Nicholas & Tomasevic, LLP includes, but is not limited to, California Superior Court certification of class action cases for purposes of trial and for settlement in a variety of contexts, including unfair competition, false advertising, and wage and hour litigation. Nicholas & Tomasevic, LLP has played a leading role in shaping class action law in California by obtaining Ninth Circuit decisions affirming that class action waivers contained in consumer contracts are void as unconscionable under California law, which have been followed and cited throughout the country.

Representative cases handled by Nicholas & Tomasevic, LLP include:

i. *Laster v. T-Mobile* to represent a class of consumers who were charged sales tax on cellphones purchased as part of a "bundled" transaction. Nicholas & Tomasevic, LLP successfully argued both before the United States District Court and at the Ninth Circuit Court of Appeal that the waiver of class action rights is unconscionable under California law. N&T participated in the drafting of a United States Supreme Court certification petition opposition, requesting that the

Supreme Court deny certification, and prevailed on the certification issue at the United States Supreme Court.

ii. *Concepcion v. AT&T* to represent a class of consumers who were charged sales tax on cellphones advertised as "free." Nicholas & Tomasevic, LLP (formerly Nicholas & Butler, LLP) participated in the successful defeat of a "second generation" arbitration provision which denies class action rights but includes additional provisions that the cell phone carrier argued were not unconscionable. Again, Nicholas & Tomasevic, LLP was successful both at the District Court and Ninth Circuit Court of Appeal in confirming the unconscionability of the arbitration clause. The *Concepcion* decision by the Ninth Circuit was challenged by another United States Supreme Court certification petition and Nicholas & Tomasevic, LLP participated in the opposition to that certification petition, and the briefing of the merits once the U.S. Supreme Court took it up.

iii. *Loera v. Akal Security* to represent a class of approximately 350 guards who did not receive appropriate overtime, breaks, or meal periods in accordance with California law.

iv. *Cohen v. Robert Bosch Tools* to represent a class of consumers who purchased saws that were mislabeled as "Made in the USA."

v. *Nava v. Home Carpet Investment, Inc.* to represent a class of employees of Home Carpet who did not receive appropriate overtime, breaks, or meal periods in accordance with California law.

vi. *Maxwell v. Toys R Us* to represent a class of Toys R Us and Babies R Us customers for claims relating to Toys R Us's gift card program.

vii. *Moyle v. Liberty Mutual Insurance Company* to represent a non-opt out class of 1,166 employees seeking past service credits resulting from Liberty Mutual's purchase of Golden Eagle Insurance Company's assets through the rehabilitation process.

viii. *LaGuardia v. Allegro Towers* to represent four classes of current and former tenants who had their security deposits unlawfully withheld, and who were charged unlawful late and insufficient funds fees.

Craig M. Nicholas, Partner

Craig M. Nicholas is a founding partner in the law firm of Nicholas & Tomasevic LLP. In 2009, *The San Diego Daily Transcript* identified Mr. Nicholas as one of the top 25 corporate litigators in San Diego County. *SuperLawyers* magazine twice selected Mr. Nicholas as one of the top attorneys in California - for 2008 and 2009. Only five percent of the lawyers in California are named by *SuperLawyers*. In April 2009, the Litigation Counsel of America Trial Lawyer Honor Society invited Mr. Nicholas to become a Fellow, an honor bestowed on less than one-half of one percent of American lawyers.

Mr. Nicholas is a leader in the San Diego litigation community. He has served on the Executive Board of Directors of the William Enright Chapter of the American Inns of Court. Mr. Nicholas was an Associate with the Louis Welsh Chapter of the American Inns of Court in 2001. Mr. Nicholas is a former President and a member of the Board of Directors of the State Bar of California Young Lawyers Division.

Mr. Nicholas received his Juris Doctor in 1995 with *cum laude* honors from the University of Arizona College of Law, where he served as a member of the National Moot Court team and Note & Comment Editor of the Arizona Journal of International and Comparative Law. He completed his undergraduate education at the University of California at San Diego, where he graduated *cum laude* with a BA in political science in 1992. Mr. Nicholas was a partner at the antitrust and business litigation law firm of Wright & L'Estrange from 2002-2004.

Mr. Nicholas has significant experience in complex litigation in state and federal court, including business disputes, officer and director liability, class action consumer rights, real estate and employment litigation. He has been a member of the San Diego County Bar Association, American Business Trial Lawyers Association San Diego Chapter, and the Federal Bar Association. Mr. Nicholas is admitted to practice before all California state courts and the United States District Courts in the Southern and Central Districts of California.

Alex Tomasevic, Partner

Mr. Tomasevic joined Nicholas & Tomasevic, LLP in 2006. Mr. Tomasevic's practice areas include consumer and employment class actions, business and employment litigation, arbitration, and appeals. Mr. Tomasevic's significant experience includes representing both individuals and large and small businesses in front of state and federal trial courts, and state and federal appellate courts. He has extensive experience in all phases of civil litigation including discovery, trials, arbitrations, settlement negotiations, and appeals.

Before joining the firm, Mr. Tomasevic gained criminal law and oral advocacy experience with the San Diego County Office of the Alternate Public Defender. While pursuing his Juris Doctorate, Mr. Tomasevic also served as a paid research assistant to University of San Diego professor Lynne L. Dallas where he researched and wrote on topics including law and economics, corporate governance and litigation, securities regulation, and international trade.

Mr. Tomasevic received his Juris Doctorate in 2006, *cum laude*, from the University Of San Diego School Of Law where he was a recipient of the Warren Family Scholarship. Mr. Tomasevic competed extensively in Moot Court and Mock Trial competitions garnering several semi-finalist and finalist honors including a First Place finish in the 2004 "ATLA Inter-School Mock Trial Tournament" between University of San Diego, Thomas Jefferson, and California Western law schools. Mr. Tomasevic also received highest grade distinction in 2004 in his class on "International Litigation and Arbitration."

Mr. Tomasevic is admitted to practice before all of the California state trial and appellate courts, the United States District Court for the Southern, Central, Eastern, and Northern Districts of California; the United States Court of Appeals for the Ninth Circuit; and the United States Supreme Court. He is a member of the San Diego County Bar Association and its Litigation Section.

Lacy Wells, Associate

Lacy Wells is an Associate Attorney with Nicholas & Tomasevic, LLP. Ms. Wells was admitted to the California Bar in 2015, but she has worked for the firm since 2012. Ms. Wells is admitted to practice before all of the California state trial courts and the United States District Court for the Southern and Central Districts of California.

In 2015, Ms. Wells received her Juris Doctor from California Western School of Law. Ms. Wells served as a student mediator at Vista Small Claims Court. While at California Western, Ms. Wells was awarded the highest grade distinction for Trial Practice and was on the Dean's List in 2014. Additionally, Ms. Wells was a summer intern with in-house corporate counsel for a prominent sports and entertainment company.

Ms. Wells completed her undergraduate education at Northern Arizona University, where she graduated with a Bachelor of Science in Accountancy and a minor in Criminal Justice. Ms. Wells worked for several years in accounting and human resource management.

David G. Greco, Associate

David Greco joined Nicholas and Tomasevic, LLP in 2016. He represents both defendants and plaintiffs in complex class actions, employment cases, insurance coverage claims, and business disputes. He counsels employers on compliance issues under state and federal law and has substantial experience drafting and refining employee handbooks. Prior to joining Nicholas and Tomasevic, LLP, Mr. Greco represented corporations, public entities, and non-profits in an array of matters including claims for employment discrimination, sexual misconduct, traumatic brain injury, as well as violations of consumer protection and privacy laws.

Mr. Greco graduated *magna cum laude* from the University Of San Diego School Of Law. While there, he founded and ran the Employment & Labor Law Society. In that capacity, he successfully petitioned the University to add an employment & labor concentration to its curriculum. He earned several accolades, including a "High Honors" designation and "Best Writing" award in Advanced Legal Writing. Mr. Greco later served as a teaching assistant for Advanced Legal Writing. Mr. Greco continues his dedication to student development by tutoring students in legal writing and bar exam preparation.

Mr. Greco's professional experience spans across various practice areas and all stages of litigation. While in law school, he interned with two judges—The Honorable Janis Sammartino of the U.S. District Court and the Honorable Terry O'Rourke of the California Court of Appeal. He also participated in the University of San Diego's first-ever Supreme Court Clinic, wherein a group of students filed an amicus brief with the United States Supreme Court in Noel Canning v. National Labor Relations Board. The United States Supreme Court cited to this brief in its final opinion. After law school, he worked as a volunteer attorney in the Employment & Administrative Mandate Section of the California Attorney General, where he represented various State of California entities in State Personnel Board disputes and lawsuits alleging employment discrimination.

Shaun Markley, Associate

Shaun Markley is an Associate Attorney with Nicholas & Tomasevic LLP. He represents both defendants and plaintiffs in business disputes, employment cases, insurance coverage claims, and complex class actions.

Prior to joining the firm, Mr. Markley gained substantial experience in all phases of litigation. He drafted and argued a variety of successful motions, eliminating potential liability faced by health care clients. Shaun also worked with businesses to obtain insurance coverage for litigation matters, in particular, those involving intellectual property rights.

Mr. Markley graduated from The Ohio State University's Moritz College of Law. While at Ohio State, Mr. Markley was an Academic Merit Scholar and received the CALI Award for Excellence in Professional Responsibility. Prior to attending law school, Mr. Markley double majored in Political Science as well as Criminology, Law, and Society at University of California, Irvine.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- MONTHLY

Firm Name: Nicholas & Tomasevic, LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
(P) Craig Nicholas									1 00		1 80	1 40			4 20	$600 00	$2,520 00		
(P) Alex Tomasevic											4 90	0 80			5 70	$450 00	$2,565 00		
(A) Lacy Wells											0 40				0 40	$350 00	$140 00		
															0 00	$0 00	$0 00		
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.00**	**7.10**	**2.20**	**0.00**	**0.00**	**10.30**	**$2,250.00**	**$5,225.00**		
NON-ATTORNEYS																			
Kayleigh Klinzman											0 10				0 10	$125 00	$12 50		
															0 00	$0 00	$0 00		
															0 00	$0 00	$0 00		
															0 00	$0 00	$0 00		
															0 00	$0 00	$0 00		
															0 00	$0 00	$0 00		
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.10**	**0.00**	**0.00**	**0.00**	**0.10**	**$125.00**	**$12.50**		
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.00**	**7.20**	**2.20**	**0.00**	**0.00**	**10.40**	**$2,375.00**	**$5,237.50**		

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

ICH T E IC

TT E	D TE E	H TE
Craig M. Nicholas	Pre-2016	$500/hour
Alex Tomasevic	Pre-2016	$350/hour
_		

TT E	D TE E	H TE
Kayleigh Klinzman	Pre-2016	$125/hour

EXHIBIT D

(REDACTED)

NICHOLAS & TOMASEVIC LLP

ATTORNEYS AT LAW

Tel: 619-325-0492
Fax: 619-325-0496

225 Broadway, 19th Floor
San Diego, CA 92101

Federal Tax I.D. No. 463474065

April 24, 2017

Bradley Van Patten

In Reference To: Van Patten v. LC Chem Ltd., et al.

Our File No.: V1378 .002
Invoice No.: 18437

Professional Services

			Hrs/Rate	Amount
8/15/2013	CN	Review orders administratively dismissing related cases.	1.00 500.00/hr	500.00
8/27/2013	PL	Email G. Rikos re related cases dismissal.	0.10 125.00/hr	12.50
11/13/2013	AT	Confer with counsel re status of discovery and scheduling moving forward.	4.30 350.00/hr	1,505.00
1/2/2017	AT	[redacted]	0.40 450.00/hr	180.00
1/3/2017	AT	[redacted]	0.80 450.00/hr	360.00

			Hrs/Rate	Amount
1/3/2017	AT	[redacted]	0.20 450.00/hr	90.00
	CN	[redacted]	1.40 600.00/hr	840.00
	CN	Meeting with G. Rikos re concerns on attorneys fees division provisions and [redacted]	0.80 600.00/hr	480.00
1/7/2017	CN	Attention to stipulation resetting motion for preliminary approval.	0.10 600.00/hr	60.00
1/9/2017	CN	Attention to Statement of Decision.	0.10 600.00/hr	60.00
1/20/2017	CN	Review joint motion to dismiss amended complaint.	0.20 600.00/hr	120.00
1/24/2017	LW	Attention to monthly time report status; review email notification history; correspond with lead counsel re updating contact information and past submissions of costs.	0.40 350.00/hr	140.00
	CN	Attention to correspondence from lead counsel; coordinate update with L. Wells; review time report status.	0.30 600.00/hr	180.00
1/25/2017	CN	Review Motion for Preliminary Approval of Settlement and supporting declarations.	0.30 600.00/hr	180.00
		For professional services rendered	10.40	$4,707.50

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
ICH T E IC
Reported Expenses Incurred on Behalf of IPPs

EX E E E T

C TE	**T I C ED**
Attorney Service	$0.00
Litigation Assessment	$52.70
Court Fees (Filing, etc.)	$0.00
Document Production	$0.00
Experts/Consultants	$0.00
Federal Express	$0.00
Transcripts (Hearing, Deposition, etc.)	$0.00
Investigation	$0.00
Lexis/Westlaw	$45.14
Messenger/Delivery	$0.00
Photocopies – In House (capped at $0.20 per copy)	$6.30
Photocopies – Outside	$0.00
Postage	$2.70
Service of Process	$0.00
Supplies	$0.00
Telephone/Telecopier	$0.00
Travel	$0.00
Miscellaneous	$0.00
T T	$106.84

EXHIBIT 48

Counsel for Indirect Purchaser Plaintiffs

Jeremy A. Lieberman
POMERANTZ LLP
600 Third Avenue, 20th Flo
New York, NY 10016
Tel: (212)661-1100
jalieberman@pomlaw.com

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF POMERANTZ LLP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Jeremy A. Lieberman, declare:

1. I am the Managing Partner of Pomerantz LLP ("Pomerantz"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Gersimos Molfetas and as counsel for IPPs throughout the course of this litigation. The background and experience of Pomerantz and its attorneys are summarized in the curriculum vitae attached hereto as Exhibit A.

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

4. During the pendency of the litigation, Pomerantz performed the following work: responded to written and document production discovery on behalf of Gerasimos Molfetas, communicated with Mr. Molfetas, prepared an outline to prepare class representatives for deposition, prepared and defended Mr. Molfetas for his deposition.

5. A summary of work performed by Pomerantz and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Jeremy A. Lieberman in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Pomerantz and filed on May 26, 2017. (ECF No. 1813-30. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Pomerantz since June 1, 2013 was 54.5, with a corresponding lodestar of $44,690 based on current rates.

7. Attached hereto as Exhibit B is a summary of the expenses Pomerantz has incurred from June 1, 2013 to present, plus applicable case filing fees. Pomerantz expended a total of $2,755.05 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Pomerantz on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports,

vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Pomerantz in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 9, 2019 at New York, New York.

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

POMERANTZLLP

History Pomerantz LLP is one of the most respected law firms in the United States dedicated to representing investors. The Firm was founded in 1936 by the late Abraham L. Pomerantz, widely regarded as a legal pioneer and "dean" of the plaintiffs' securities bar, who helped secure the right of investors to bring class and derivative actions.

Leadership Today, led by Managing Partner Jeremy A. Lieberman, the Firm maintains the commitments to excellence and integrity passed down by Mr. Pomerantz.

Results Pomerantz began 2018 with a landmark $3 billion settlement for investors, and precedent-setting legal rulings, in *In re Petrobras Securities Litigation*. Pomerantz consistently shapes the law, having won landmark decisions that expanded and protected investor rights and initiated historic corporate governance reforms, including securing the rights of U.S. and foreign institutions that purchased BP shares abroad to bring common law claims in U.S. court.

Global Expertise Jennifer Pafiti, Partner and Head of Client Services, is dually qualified to practice in the United States and United Kingdom. Our Paris office is headed by French lawyer, Nicolas Tatin, Pomerantz's Director-Business Development Consultant for France, Benelux, Monaco and Switzerland. In addition to the Firm's in-house team in the United States and Paris, Pomerantz utilizes an extensive network of prominent law firms in the United Kingdom, Switzerland, and the Middle East, so that we are ready to assist clients, wherever they are situated, in recovering monies lost due to corporate misconduct and securities fraud. Our team of attorneys is collectively fluent in English, Arabic, Mandarin Chinese, Farsi, French, Hebrew, Italian, Portuguese, Romanian, Spanish, and Taiwanese.

Practice Pomerantz protects, expands, and vindicates shareholder rights through our securities litigation services and portfolio monitoring program. The Firm represents some of the largest pension funds, asset managers and institutional investors around the globe, monitoring assets of $5 trillion, and growing. Pomerantz's practice includes corporate governance, antitrust, and strategic consumer litigation.

Recognition In 2019, Jeremy Lieberman was honored as Plaintiff Attorney of the Year by Benchmark Litigation; Pomerantz also received Benchmark Litigation's National Case Impact Award for *In re Petrobras Securities Litig*. In 2018, Pomerantz was honored as a Law360 Securities Practice Group of the Year and was a finalist for the *National Law Journal*'s Elite Trial Lawyers award; Jeremy Lieberman was named a Law360 Titan of the Plaintiffs' Bar and a Benchmark Litigation Star. Among other accolades, many of our attorneys have been chosen by their peers, year after year, as Super Lawyers® Top-Rated Securities Litigation Attorneys and Rising Stars.

Pomerantz is headquartered in New York City, with offices in
Chicago, Los Angeles and Paris.

Securities Litigation

Significant Landmarks

On January 3, 2018, in a significant victory for investors, Pomerantz, as sole Lead Counsel for the class, along with Lead Plaintiff Universities Superannuation Scheme Limited ("USS"), achieved a historic $2.95 billion settlement with Petróleo Brasileiro S.A. ("Petrobras") and its related entity, Petrobras International Finance Company, as well as certain of Petrobras' former executives and directors. On February 2, 2018, Pomerantz and USS reached a $50 million settlement with Petrobras' auditors, PricewaterhouseCoopers Auditores Independentes, bringing the total recovery for Petrobras investors to $3 billion. This is not only the largest securities class action settlement in a decade but is the largest settlement ever in a securities class action involving a foreign issuer, the fifth-largest securities class action settlement ever achieved in the United States, the largest securities class action settlement achieved by a foreign Lead Plaintiff, and the largest securities class action settlement in history not involving a restatement of financial reports.

The class action, brought on behalf of all purchasers of common and preferred American Depositary Shares ("ADSs") on the New York Stock Exchange, as well as purchasers of certain Petrobras debt, principally alleged that Petrobras and its senior executives engaged in a multi-year, multi-billion-dollar money-laundering and bribery scheme, which was concealed from investors.

The settlement was achieved after nearly three years of hard-fought litigation, including U.S. and foreign discovery and complex motion practice before Judge Jed S. Rakoff, United States District Judge for the Southern District of New York; and an appeal before the United States Court of Appeals for the Second Circuit. Defendants also filed a petition for writ of certiorari with the United States Supreme Court.

In addition to the outstanding multi-billion-dollar recovery to investors, Pomerantz secured precedent-setting decisions during the litigation. In a February 2016 Opinion and Order, the district court certified all the classes proposed by plaintiffs, encompassing not only purchasers of Petrobras American Depository Receipts, but also Petrobras bondholders who acquired securities pursuant to domestic transactions. Plaintiffs asserted claims under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, and Sections 11, 12(a)(2), and 15 of the Securities Act of 1933. Defendants appealed the district court's certification opinion on multiple grounds, including for failure to satisfy the requirement of ascertainability, and for failure to satisfy the burden of showing that the Petrobras securities at issue traded in efficient markets. The Second Circuit accepted the appeal and largely rejected defendants' arguments, sending the case back to the district court for further proceedings.

The Second Circuit's decision is an important and favorable precedent in several respects. First, in an issue of first impression, the Second Circuit squarely rejected defendants' invitation to adopt the heightened ascertainability requirement promulgated by the United States Court of Appeals for the Third Circuit, which would have required plaintiffs to demonstrate that determining membership in a class is "administratively feasible." The Second Circuit's rejection of this standard is not only a victory for bondholders in securities class actions, but also for plaintiffs in consumer fraud class actions and other class actions where documentation regarding Class membership is not readily attainable.

With respect to Petrobras' bondholders, the Second Circuit vacated the district court's granting of class certification, but only to the extent that it did not perform an analysis regarding the impact of the Supreme Court's decision in *Morrison v. National Australia Bank Ltd*., 561 U.S. 247 (2010), on the predominance requirement of class certification, acknowledging that "the district court might properly certify one or more classes that capture all of the Securities holders who fall within the Classes as currently defined." *In re Petrobras Sec. Litig.,* 862 F.3d 250, 274 (2d Cir. 2017).

The Second Circuit also refused to adopt a requirement, urged by defendants, that all securities class action plaintiffs seeking class certification prove through direct evidence (*i.e.*, via an event study) that the prices of the relevant securities moved in a particular direction in response to new information.

Pomerantz, as sole Lead Counsel in *Strougo v. Barclays PLC,* No. 14-cv-5797 (S.D.N.Y.), achieved a $27 million settlement for the Class (pending court approval) in January 2019. This high-profile securities litigation alleges that defendants concealed information and misled investors regarding its management of its "LX" dark pool, a private trading platform where the size and price of the orders are not revealed to other participants. On November 6, 2017, the Second Circuit affirmed former District Court Judge Shira S. Scheindlin's February 2, 2016, Opinion and Order granting plaintiffs' motion for class certification in the case.

The Court of Appeals in *Barclays* held that direct evidence of price impact is not always necessary to demonstrate market efficiency, as required to invoke the *Basic* presumption of reliance, and was not required here. Significantly, when handing down its decision, the Second Circuit cited its own *Petrobras* decision, stating, "We have repeatedly—and recently—declined to adopt a particular test for market efficiency." *Waggoner v. Barclays PLC,* 875 F.3d 79, 94 (2d Cir. 2017).

The court held that defendants seeking to rebut the *Basic* presumption of reliance on an efficient market must do so by a preponderance of the evidence. The court further held that it would be inconsistent with *Halliburton II* to "allow [ ] defendants to rebut the *Basic* presumption by simply producing *some* evidence of market inefficiency, but not demonstrating its inefficiency to the district court." *Id.* at 100. The court rejected defendants' contention that Federal Rule of Evidence 301 applies, and made clear that the *Basic* presumption is a judicially-created doctrine and thus the burden of persuasion properly shifts to defendants. The court thus confirmed that plaintiffs have no burden to show price impact at the class certification stage—a significant victory for investors.

On September 10, 2018, Pomerantz, as Co-Lead Counsel, achieved final approval of a historic $80 million settlement for the Class in *In re Yahoo! Inc. Sec. Litig.*, No. 17-cv-00373 (N.D. Cal.). The complaint, filed in January 2017, alleged that the internet giant intentionally misled investors about its cybersecurity practices in the wake of massive data breaches in 2013 and 2014 that compromised the personal information of all 3 billion Yahoo customers. Plaintiffs allege that Yahoo violated federal securities laws by failing to disclose the breaches, which caused a subsequent stock price dive. This represents the first significant settlement to date of a securities fraud class action filed in response to a data breach.

As part of due diligence, Pomerantz located critical evidence showing that Yahoo's management had concurrent knowledge of at least one of the data breaches. Importantly, these records showed that Yahoo's Board of Directors, including Defendant CEO Marissa Mayer, had knowledge of and received repeated updates regarding the breach. In its public filings, Yahoo denied that the CEO knew about the breach, and the CEO's knowledge was a key issue in the case.

After receiving Plaintiffs' opposition to the motion to dismiss, but before the federal District Court ruled on the motion, the case settled for $80 million. This early and large settlement reflects the strength of the complaint's allegations.

In May 2017, Pomerantz, as Co-Lead Counsel, achieved final approval of a $135 million recovery for the Class in *Kaplan v. S.A.C. Capital Advisors, L.P*, No. 12-cv-9350 (S.D.N.Y.). This securities class action stemmed from what has been called the most profitable insider trading scheme in U.S. history. After years of vigorous litigation, billionaire Steven A. Cohen's former hedge fund, S.A.C. Capital Advisors LP, agreed to settle the lawsuit by investors in the drug maker Elan Corp, who said they lost money because of insider trading by one of his portfolio managers.

In July 2017, Pomerantz secured the right of investors in BP p.l.c. to pursue "holder claims." The ruling, by Judge Keith P. Ellison of the U.S. District Court for the Southern District of Texas, is significant, given the dearth of precedent from anywhere in the U.S. that both recognizes the potential viability of a holder claim under some body of non-U.S. federal law and holds that the plaintiffs pursuing one had sufficiently alleged facts giving rise to reliance and other required elements of the underlying legal claims. Since 2012, Pomerantz has pursued ground-breaking claims on behalf of institutional investors in BP p.l.c. to recover losses in BP's common stock (which trades on the London Stock Exchange) stemming from the 2010 Gulf oil spill. The threshold challenge was how to litigate in U.S. court in the wake of the Supreme Court's 2010 decision in *Morrison v. National Australia Bank*, which barred recovery for losses in foreign-traded securities under the U.S. federal securities laws. In 2013 and 2014, Pomerantz secured a series of significant victories in individual actions pursued on behalf of institutional investors in *In re BP p.l.c. Securities Litigation*, MDL No. 2185 (S.D. Tex.). Pomerantz defeated BP's *forum non conveniens* arguments seeking dismissal of U.S. institutions and, later, foreign institutions, pursuing English common law claims seeking recovery of investment losses stemming in both NYSE-traded ADSs and London Stock Exchange (LSE)-traded common stock. Pomerantz also defeated BP's attempt to extend the Securities Litigation Uniform Standards Act to dismiss these claims. Thanks to these rulings, Pomerantz now leads the only litigation, post-*Morrison*, where U.S. and foreign investors, pursuing foreign claims seeking recovery for losses in foreign-traded stocks, are doing so in a U.S. court.

In June 2010, Judge Nicholas G. Garaufis of the U.S. District Court for the Eastern District of New York granted final approval of a $225 million settlement proposed by Pomerantz and Lead Plaintiff the Menora Group, with Comverse Technology and certain of Comverse's former officers and directors, after four years of highly-contested litigation. The *Comverse* settlement is one of the largest securities class action settlements reached since the passage of the Private Securities Litigation Reform Act ("PSLRA").[1] It is the second-largest recovery in a securities litigation involving the backdating of options, as well as one of the largest recoveries – $60 million – from an individual officer-defendant, Comverse's founder and former CEO, Kobi Alexander. *In re Comverse Technology, Inc. Sec. Litig.,* No. 06-CV-1825 (E.D.N.Y.)

Even before the enactment of the PSLRA, Pomerantz represented state agencies in securities class actions, including the Treasurer of the Commonwealth of Pennsylvania (recovered $100 million) against a major investment bank. *In re Salomon Brothers Treasury Litig.*, No. 91-cv-5471 (S.D.N.Y.).

[1] Institutional Shareholder Services, *SCAS Top 100 Settlements Quarterly Report* (Sept. 30, 2010).

Pomerantz recovered $50 million for the Treasurer of the State of New Jersey and several New Jersey pension funds in an individual action. This was a substantially higher recovery than what our clients would have obtained had they remained in a related federal class action. *Treasurer of State of New Jersey v. AOL Time Warner, Inc.* (N.J. Super. Ct. Law Div., Mercer Cty.).

Pomerantz has litigated numerous cases for the Louisiana School Employees' Retirement System. For example, as Lead Counsel, Pomerantz recovered $74.75 million in a securities fraud class action against Citigroup, its CEO Sanford Weill, and its now infamous telecommunications analyst Jack Grubman. *In re Salomon Analyst AT&T Litig*., No. 02-cv-6801 (S.D.N.Y.) Also, the Firm played a major role in a complex antitrust and securities class action which settled for over $1 billion. *In re NASDAQ Market-Makers Antitrust Litig*., MDL No. 1023 (S.D.N.Y.). Pomerantz was a member of the Executive Committee in *In re Transkaryotic Therapies, Inc. Securities Litigation*, C.A. No. 03-10165 (D. Mass.), helping to win a $50 million settlement for the class.

In 2008, together with Co-Counsel, Pomerantz identified a substantial opportunity for recovery of losses in Countrywide mortgage-backed securities ("MBS") for three large New Mexico funds (New Mexico State Investment Council, New Mexico Public Employees' Retirement Association, and New Mexico Educational Retirement Board), which had been overlooked by all of the firms then in their securities litigation pool. We then filed the first non-class lawsuit by a public institution with respect to Countrywide MBS. *See N.M. State Inv. Council v. Countrywide Fin. Corp.,* No. D-0101-CV-2008-02289 (N.M. 1st Dist. Ct.). In Fall 2010, we negotiated for our clients an extremely favorable but confidential settlement.

Over its long history, Pomerantz has achieved significant settlements in numerous cases, a sampling of which is listed below:

- *In re Petrobras Sec. Litig.*, No. 14-cv-9662 (S.D.N.Y. 2018)
  $3 billion settlement of securities class action in which Pomerantz was Lead Counsel.
- *In re Yahoo! Inc. Sec. Litig.,* No. 17-cv-00373 (N.D. Cal. 2018)
  $80 million settlement of securities class action in which Pomerantz was Co-Lead Counsel
- *In re Libor Based Financial Instruments Antitrust Litig.,* 1:11-md-2262
  $31 billion partial settlement with three defendants in this multi-district litigation in which Pomerantz represents the Berkshire Bank and the Government Development Bank for Puerto Rico
- *Strougo v. Barclays PLC,* No. 14-cv-5797 (S.D.N.Y. 2019)
  $27 million settlement (pending court approval) of securities class action in which Pomerantz was Lead Counsel
- *In re Am. Capital, Ltd. S'holder Litig.*, No. 422598-V (Md. Cir Ct. Montgomery Cty. 2018)
  $17.5 million settlement of class action in which Pomerantz was Co-Lead Counsel.
- *Kaplan v. S.A.C. Capital Advisors, L.P.*, No. 12-cv-9350 (S.D.N.Y. 2017)
  $135 million settlement of class action in which Pomerantz was Co-Lead Counsel.
- *Thomas v. Magnachip Semiconductor Corp.*, No. 14-cv-01160 (N.D. Cal. 2016)
  $23.5 million partial settlement of class action in which Pomerantz was sole Lead Counsel.
- *In re Lumber Liquidators, Inc. Sec. Litig.,* No. 13-cv-00157 (E.D. Va. 2016)
  $26 million and 1 million shares of common stock settlement in class action in which Pomerantz was sole Lead Counsel.
- *Thorpe v. Walter Inv. Mgmt. Corp.,* No. 14-cv-20880 (S.D. Fla. 2016)
  $24 million settlement of class action in which Pomerantz was sole Lead Counsel.

- *In re Groupon, Inc. Sec. Litig.*, No. 12-cv-02450 (N.D. Ill. 2015)
  $45 million settlement of class action in which Pomerantz was sole Lead Counsel.
- *In re Sealed Air Corp. Sec. Litig.*, No. 03-cv-4372 (D.N.J. 2010)
  $20 million settlement in class action in which Pomerantz was Co-Lead Counsel representing the Louisiana Municipal Police Employees' Retirement System.
- *In re Elan Corp. Sec. Litig.*, No. 05-cv-2860 (S.D.N.Y. 2005)
  $75 million settlement in class action arising out of alleged accounting manipulations.
- *In re Livent, Inc. Noteholders Sec. Litig.*, No. 98-cv-7161 (S.D.N.Y. 2005)
  $17 million settlement for the class; plus summary judgment against remaining defendants for $36 million (including pre-judgment interest); totaling over 100% of claimed damages.
- *In re Safety-Kleen Corp. Stockholders Litig.*, No. 00-cv-736-17 (D.S.C. 2004)
  $54.5 million in total settlements in class action alleging accounting manipulations by corporate officials and auditors; last settlement reached on eve of trial.
- *Duckworth v. Country Life Ins. Co.*, No. 1998-CH-01046 (Ill. Cir. Ct., Cook Cty. 2000)
  $45 million recovery.
- *Snyder v. Nationwide Ins. Co.*, No. 97/0633 (N.Y. Sup. Ct. Onondaga Cty. 1998)
  Settlement valued at $100 million in derivative case arising from injuries to consumers purchasing life insurance policies.
- *In re National Health Lab., Inc. Sec. Litig.*, No. CV 92-1949 (S.D. Cal. 1995)
  $64 million recovery.
- *In re First Executive Corp. Sec. Litig.*, No. 89-cv-07135 (C.D. Cal. 1994)
  $102 million recovery for the class, exposing a massive securities fraud arising out of the Michael Milken debacle.
- *In re Boardwalk Marketplace Sec. Litig.*, MDL No. 712 (D. Conn. 1994)
  Over $66 million benefit in securities fraud action.
- *In re Telerate, Inc. S'holders Litig.*, C.A. No. 1115 (Del. Ch. 1989)
  $95 million benefit in case alleging violation of fiduciary duty under state law.

Pomerantz has also obtained stellar results for private institutions and Taft-Hartley funds. Below are a few examples:

- *In re Charter Commc'ns, Inc. Sec. Litig*., No. 02-cv-1186 (E.D. Mo. 2005) (sole Lead Counsel for Lead Plaintiff StoneRidge Investment Partners LLC); $146.25 million class settlement, where Charter also agreed to enact substantive improvements in corporate governance.
- *In re Am. Italian Pasta Sec. Litig.*, No. 05-cv-865 (W.D. Mo. 2008) (sole Lead Counsel for Lead Plaintiff Ironworkers Locals 40, 361 and 417; $28.5 million aggregate settlements).
- *Richardson v. Gray*, No. 116880/1995 (N.Y. Sup. Ct. N.Y. Cty. 1999); and *In re Summit Metals*, No. 98-2870 (Bankr. D. Del. 2004) (two derivative actions where the Firm represented C.C. Partners Ltd. and obtained judgment of contempt against controlling shareholder for having made "extraordinary" payments to himself in violation of a preliminary injunction; persuaded the court to jail him for two years upon his refusal to pay; and, in a related action, won a $43 million judgment after trial and obtained turnover of stock of two companies).

Shaping the Law

Not only has Pomerantz established a long track record of obtaining substantial monetary recoveries for our clients; whenever appropriate, we also pursue corporate governance reforms on their behalf. In *In re Chesapeake Shareholders Derivative Litig*ation, No. CJ-2009-3983 (Okla. Dist. Ct., Okla. Cty. 2011), for example, the Firm served as Co-Lead Counsel, representing a public pension client in a derivative case arising from an excessive compensation package granted to Chesapeake's CEO and founder. This was a derivative action, not a class action. Yet it is illustrative of the results that can be obtained by an institutional investor in the corporate governance arena. There we obtained a settlement which called for the repayment of $12.1 million and other consideration by the CEO. The Wall Street Journal (Nov. 3, 2011) characterized the settlement as "a rare concession for the 52-year old executive, who has run the company largely by his own rules since he co-founded it in 1989." The settlement also included comprehensive corporate governance reforms.

The Firm has won many landmark decisions that have enhanced shareholders' rights and improved corporate governance. These include decisions that established that:

- defendants seeking to rebut the *Basic* presumption of reliance on an efficient market must do so by a preponderance of the evidence. *Waggoner v. Barclays PLC*, 875 F.3d 79 (2d Cir. 2017) (*Strougo v. Barclays PLC,* in the court below);
- plaintiffs have no burden to show price impact at the class certification stage. *Waggoner v. Barclays PLC*, 875 F.3d 79 (2d Cir. 2017) (*Strougo v. Barclays PLC,* in the court below);
- the ascertainability doctrine requires only that a class be defined using objective criteria that establish a membership with definite boundaries. *Universities Superannuation Scheme Ltd. v. Petróleo Brasileiro S.A. Petrobras*, 862 F.3d 250 (2d Cir. 2017);
- companies cannot adopt bylaws to regulate the rights of former stockholders. *Strougo v. Hollander*, C.A. No. 9770-CB (Del. Ch. 2015);
- a temporary rise in share price above its purchase price in the aftermath of a corrective disclosure does not eviscerate an investor's claim for damages. *Acticon AG v. China Ne. Petroleum Holdings Ltd.,* 692 F.3d 34 (2d Cir. 2012);
- an MBS holder may bring claims if the MBS price declines even if all payments of principal and interest have been made. Transcript of Proceedings, *N.M. State Inv. Council v. Countrywide Fin. Corp.,* No. D-0101-CV-2008-02289 (N.M. 1st Dist. Ct. Mar. 25, 2009);
- when a court selects a Lead Plaintiff under the Private Securities Litigation Reform Act ("PSLRA"), the standard for calculating the "largest financial interest" must take into account sales as well as purchases. *In re Comverse Tech.,, Inc. Sec. Litig*., No. 06-cv-1825, 2007 U.S. Dist. LEXIS 14878 (E.D.N.Y. Mar. 2, 2007);
- a managing underwriter can owe fiduciary duties of loyalty and care to an issuer in connection with a public offering of the issuer stock, even in the absence of any contractual agreement. Professor John C. Coffee, a renowned Columbia University securities law professor, commenting on the ruling, stated: "It's going to change the practice of all underwriting." *EBC I, Inc. v. Goldman Sachs & Co*., 5 N.Y. 3d 11 (2005);
- purchasers of options have standing to sue under federal securities laws. *In re Green Tree Fin. Corp. Options Litig.*, No. 97-2679, 2002 U.S. Dist. LEXIS 13986 (D. Minn. July 29, 2002);
- shareholders have a right to a jury trial in derivative actions. *Ross v. Bernhard*, 396 U.S. 531 (1970);

- a company may have the obligation to disclose to shareholders its Board's consideration of important corporate transactions, such as the possibility of a spin-off, even before any final decision has been made. *Kronfeld v. Trans World Airlines, Inc*., 832 F.2d 726 (2d Cir. 1987);
- specific standards for assessing whether mutual fund advisors breach fiduciary duties by charging excessive fees. *Gartenberg v. Merrill Lynch Asset Mgmt., Inc*., 740 F.2d 190 (2d Cir. 1984);
- investment advisors to mutual funds are fiduciaries who cannot sell their trustee positions for a profit. *Rosenfeld v. Black*, 445 F.2d 1337 (2d Cir. 1971); and
- management directors of mutual funds have a duty to make full disclosure to outside directors "in every area where there was even a possible conflict of interest." *Moses v. Burgin*, 445 F.2d 369 (1st Cir. 1971).

Comments from the Courts

Throughout its history, courts time and again have acknowledged the Firm's ability to vigorously pursue and successfully litigate actions on behalf of investors.

In approving the $3 billion settlement in *In re Petrobras Securities Litigation* in June 2018, Judge Jed S. Rakoff of the Southern District of New York wrote:

> [T]he Court finds that Class Counsel's performance was in many respects exceptional, with the result that, as noted, the class is poised to enjoy a substantially larger per share recovery [65%] than the recovery enjoyed by numerous large and sophisticated plaintiffs who separately settled their claims.

At the hearing for preliminary approval of the settlement in *In re Petrobras Securities Litigation* in February 2018, Judge Rakoff stated:

> [T]he lawyers in this case [are] some of the best lawyers in the United States, if not in the world.

Two years earlier, in certifying two Classes in *In re Petrobras Securities Litigation* in February 2016, Judge Rakoff wrote:

> [O]n the basis not only of USS's counsel's prior experience but also the Court's observation of its advocacy over the many months since it was appointed Lead Counsel, the Court concludes that Pomerantz, the proposed class counsel, is "qualified, experienced and able to conduct the litigation." ... [T]he Pomerantz firm has both the skill and resources to represent the Classes adequately.

In approving the settlement in *Thorpe v. Walter Investment Management Corp.*, No. 14-cv-20880, 2016 U.S. Dist. LEXIS 144133 (S.D. Fla. Oct. 14, 2016) Judge Ursula Ungaro wrote:

> Class Counsel has developed a reputation for zealous advocacy in securities class actions. ... The settlement amount of $24 million is an outstanding result.

At the May 2015 hearing wherein the court approved the settlement in *Courtney v. Avid Technology, Inc.*, No. 13-cv-10686 (D. Mass. May 12, 2015), following oral argument by Jeremy A. Lieberman, Judge William G. Young stated:

> This has been very well litigated. It is always a privilege. I don't just say that as a matter of form. And I thank you for the vigorous litigation that I've been permitted to be a part of. [Tr. at 8-9.]

At the January 2012 hearing wherein the court approved the settlement in *In re Chesapeake Energy Corp. Shareholder Derivative Litigation*, No. CJ-2009-3983 (Okla. Dist. Ct., Okla. Cty. Jan. 30, 2012), following oral argument by Marc I. Gross, Judge Daniel L. Owens stated:

> Counsel, it's a pleasure, and I mean this and rarely say it. I think I've said it two times in 25 years. It is an extreme pleasure to deal with counsel of such caliber.
> [Tr. at 48.])

In approving the $225 million settlement in *In re Comverse Technology, Inc. Securities Litigation*, No. 06-CV-1825 (E.D.N.Y.) in June 2010, Judge Nicholas G. Garaufis stated:

> As outlined above, the recovery in this case is one of the highest ever achieved in this type of securities action. ... The court also notes that, throughout this litigation, it has been impressed by Lead Counsel's acumen and diligence. The briefing has been thorough, clear, and convincing, and ... Lead Counsel has not taken short cuts or relaxed its efforts at any stage of the litigation.

In approving a $146.25 million settlement in *In re Charter Communications Securities Litigation*, No. 02-CV-1186, 2005 U.S. Dist. LEXIS 14772 (E.D. Mo. June 30, 2005), in which Pomerantz served as sole Lead Counsel, Judge Charles A. Shaw praised the Firm's efforts, citing "the vigor with which Lead Counsel ... investigated claims, briefed the motions to dismiss, and negotiated the settlement." He further stated:

> This Court believes Lead Plaintiff achieved an excellent result in a complex action, where the risk of obtaining a significantly smaller recovery, if any, was substantial.

In approving a $24 million settlement in *In re Force Protection, Inc.,* No. 08 CV 845 (D.S.C. 2011), Judge C. Weston Houk described the Firm as "attorneys of great ability and great reputation" and commended the Firm for having "done an excellent job."

In certifying a class in a securities fraud action against analysts in *DeMarco v. Robertson Stephens Inc.*, 228 F.R.D. 468 (S.D.N.Y. 2005), Judge Gerard D. Lynch stated that Pomerantz had "ably and zealously represented the interests of the class."

Numerous courts have made similar comments:

- Appointing Pomerantz Lead Counsel in *American Italian Pasta Co. Securities Litigation*, No 05-CV-0725 (W.D. Mo.), a class action that involved a massive fraud and restatements spanning several years, the District Court observed that the Firm "has significant experience (and has been extremely effective) litigating securities class actions, employs highly qualified attorneys,

and possesses ample resources to effectively manage the class litigation and protect the class's interests."

- In approving the settlement in *In re Wiring Devices Antitrust Litigation*, MDL No. 331 (E.D.N.Y. Sept. 9, 1980), Chief Judge Jack B. Weinstein stated that "Counsel for the plaintiffs I think did an excellent job. ... They are outstanding and skillful. The litigation was and is extremely complex. They assumed a great deal of responsibility. They recovered a very large amount given the possibility of no recovery here which was in my opinion substantial."
- In *Snyder v. Nationwide Insurance Co.*, No. 97/0633, (N.Y. Supreme Court, Onondaga Cty.), a case where Pomerantz served as Co-Lead Counsel, Judge Tormey stated, "It was a pleasure to work with you. This is a good result. You've got some great attorneys working on it."
- In *Steinberg v. Nationwide Mutual Insurance Co.* (E.D.N.Y. 2004), Judge Spatt, granting class certification and appointing the Firm as class counsel, observed: "The Pomerantz firm has a strong reputation as class counsel and has demonstrated its competence to serve as class counsel in this motion for class certification." (224 F.R.D. 67, 766.)
- In *Mercury Savings & Loan*, No. 90-cv-00087 LHM (C.D. Cal. 1993), Judge McLaughlin commended the Firm for the "absolutely extraordinary job in this litigation."
- In *Boardwalk Marketplace Securities Litigation*, MDL No. 712 (D. Conn.), Judge Eginton described the Firm's services as "exemplary," praised it for its "usual fine job of lawyering ...[in] an extremely complex matter," and concluded that the case was "very well-handled and managed." (Tr. at 6, 5/20/92; Tr. at 10, 10/10/92.)
- In *Nodar v. Weksel*, No. 84 Civ. 3870 (S.D.N.Y.), Judge Broderick acknowledged "that the services rendered [by Pomerantz] were excellent services from the point of view of the class represented, [and] the result was an excellent result." (Tr. at 21-22, 12/27/90.)
- In *Klein v. A.G. Becker Paribas, Inc.*, No. 83 Civ. 6456 (S.D.N.Y.), Judge Goettel complimented the Firm for providing "excellent ...absolutely top-drawer representation for the class, particularly in light of the vigorous defense offered by the defense firm." (Tr. at 22, 3/6/87.)
- In *Digital Securities Litigation*, No. 83-3255 (D. Mass.), Judge Young lauded the Firm for its "[v]ery fine lawyering." (Tr. at 13, 9/18/86.)
- In *Shelter Realty Corp. v. Allied Maintenance Corp*., 75 F.R.D. 34, 40 (S.D.N.Y. 1977), Judge Frankel, referring to Pomerantz, said: "Their experience in handling class actions of this nature is known to the court and certainly puts to rest any doubt that the absent class members will receive the quality of representation to which they are entitled."
- In *Rauch v. Bilzerian*, No. 88 Civ. 15624 (N.J. Sup. Ct.), the court, after trial, referred to Pomerantz partners as "exceptionally competent counsel," and as having provided "top drawer, topflight [representation], certainly as good as I've seen in my stay on this court."

Corporate Governance Litigation

Pomerantz is committed to ensuring that companies adhere to responsible business practices and practice good corporate citizenship. We strongly support policies and procedures designed to give shareholders the ability to oversee the activities of a corporation. We vigorously pursue corporate

governance reform, particularly in the area of excess compensation, where it can address the growing disparity between the salaries of executives and the workers of major corporations. We have successfully utilized litigation to bring about corporate governance reform in numerous cases, and always consider whether such reforms are appropriate before any case is settled.

Pomerantz partners are frequent speakers at domestic and international conferences on the importance of securities fraud actions in such countries as the United Kingdom, France, and Israel. According to Senior Partner, Marc Gross, "We need to have these kinds of legal remedies available in order to maintain corporate honesty and accountability."

Pomerantz's Corporate Governance Practice Group, led by Partner Gustavo F. Bruckner, enforces shareholder rights and prosecutes actions challenging corporate transactions that arise from an unfair process or result in an unfair price for shareholders.

In September 2017, New Jersey Superior Court Judge Julio Mendez, of Cape May County Chancery Division, approved Pomerantz's settlement in a litigation against Ocean Shore Holding Co. The settlement provided non-pecuniary benefits for a non-opt out class. In so doing, Judge Mendez became the first New Jersey state court judge to formally adopt the Third Circuit's nine-part *Girsh* factors, *Girsh v. Jepson*, 521 F.2d 153 (3d Cir. 1975). There has never before been a published New Jersey state court opinion setting out the factors a court must consider in evaluating whether a class action settlement should be determined to be fair and adequate. After conducting an analysis of each of the nine *Girsh* factors and holding that "class actions settlements involving non-monetary benefits to the class are subject to more exacting scrutiny," Judge Mendez held that the proposed settlement provided a material benefit to the shareholders.

In February 2018, the Maryland Circuit Court, Montgomery County, approved a $17.5 million settlement that plaintiffs achieved as additional consideration on behalf of a class of shareholders of American Capital, Ltd. *In re Am. Capital, Ltd. S'holder Litig.*, C.A. No. 422598-V (2018). The settlement resolved Plaintiffs' claims regarding a forced sale of American Capital.

Pomerantz filed an action challenging the sale of American Capital, a Delaware corporation with its headquarters in Maryland. Among other things, American Capital's board of directors (the "Board") agreed to sell the company at a price below what two other bidders were willing to offer. Worse, the merger price was even below the amount that shareholders would have received in the company's planned phased liquidation, which the company was considering under pressure from Elliott Management, an activist hedge fund and holder of approximate 15% of American Capital stock. Elliott was not originally named as a defendant, but after initial discovery showed the extent of its involvement in the Board's breaches of fiduciary duty, Elliott was added as a defendant in an amended complaint under the theory that Elliott exercised actual control over the Board's decision-making. Elliott moved to dismiss on jurisdictional grounds and additionally challenged its alleged status as a controller of American Capital. In June 2017, minutes before the hearing on defendants' motion to dismiss, a partial settlement was entered into with the members of the Board for $11.5 million. The motion to dismiss hearing proceeded despite the partial settlement, but only as to Elliott. In July 2017, the court denied the motion to dismiss, finding that Elliott, "by virtue solely of its own conduct, … has easily satisfied the transacting business prong of the Maryland long arm statute." The court also found that the "amended complaint in this case sufficiently pleads that Elliott was a controller with respect to" the sale, thus

implicating a higher standard of review. Elliott subsequently settled the remaining claims for an additional $6 million. Pomerantz served as Co-Lead Counsel.

In May 2017, the Circuit Court of the State of Oregon approved the settlement achieved by Pomerantz and co-counsel of a derivative action brought by two shareholders of Lithia Motors, Inc. The lawsuit alleged breach of fiduciary duties by the board of directors in approving, without any meaningful review, the Transition Agreement between Lithia Motors and Sidney DeBoer, its founder, controlling shareholder, CEO, and Chairman, who was stepping down as CEO. DeBoer and his son, the current CEO, Bryan DeBoer, negotiated virtually all the material terms of the Agreement, by which the company agreed to pay the senior DeBoer $1,060,000 and a $42,000 car allowance annually for the rest of his life, plus other benefits, in addition to the $200,000 per year that he would receive for continuing to serve as Chairman.

The *Lithia* settlement extracted corporate governance therapeutics that provide substantial benefits to Lithia and its shareholders and redress the wrongdoing alleged by plaintiffs. The board will now be required to have at least five independent directors -- as defined under the New York Stock Exchange rules -- by 2020; a number of other new protocols will be in place to prevent self-dealing by board members. Further, the settlement calls for the Transition Agreement to be reviewed by an independent auditor who will determine whether the annual payments of $1,060,000 for life to Sidney DeBoer are reasonable. Lithia has agreed to accept whatever decision the auditor makes.

In January 2017, the Group received approval of the Delaware Chancery Court for a $5.6 million settlement it achieved on behalf of a class of shareholders of Physicians Formula Holdings Inc. over an ignored merger offer in 2012. *In re Physicians Formula Holdings Inc.*, C.A. No. 7794-VCL (Del. Ch.).

The Group obtained a landmark ruling in *Strougo v. Hollander*, C.A. No. 9770-CB (Del. Ch.), that fee-shifting bylaws adopted after a challenged transaction do not apply to shareholders affected by the transaction. They were also able to obtain a *25% price increase* for members of the class cashed out in the going private transaction.

In *Miller v. Bolduc*, No. SUCV 2015-00807 (Mass. Super. Ct.), the Group caused Implant Sciences to hold its first shareholder annual meeting in five years and put an important compensation grant up for a shareholder vote.

In *Smollar v. Potarazu*, C.A. No. 10287-VCN (Del. Ch.), the Group pursued a derivative action to bring about the appointment of two independent members to the board of directors, retention of an independent auditor, dissemination of financials to shareholders and the holding of first ever in-person annual meeting, among other corporate therapeutics.

In *Hallandale Beach Police Officers & Firefighters' Personnel Retirement Fund vs. Lululemon athletica, Inc.,* C.A. No. 8522-VCP (Del. Ch.), in an issue of first impression in Delaware, the Chancery Court ordered the production of the chairman's 10b5-1 stock trading plan. The court found that a stock trading plan established by the company's chairman, pursuant to which a broker, rather than the chairman himself, would liquidate a portion of the chairman's stock in the company, did not preclude potential liability for insider trading.

In *Strougo v. North State Bancorp*, No. 15 CVS 14696 (N.C. Super. Ct.), the Group caused the Merger Agreement to be amended to provide a "majority of the minority" provision for the holders of North State Bancorp's common stock in connection with the shareholder vote on the merger. As a result of the Action, common shareholders could stop the merger if they did not wish it to go forward.

Pomerantz's commitment to advancing sound corporate governance principles is further demonstrated by the more than 26 years that we have co-sponsored the Abraham L. Pomerantz Lecture Series with Brooklyn Law School. These lectures focus on critical and emerging issues concerning shareholder rights and corporate governance and bring together top academics and litigators.

Our bi-monthly newsletter, *The Pomerantz Monitor*, provides institutional investors updates and insights on current issues in corporate governance.

Antitrust Litigation

Pomerantz has earned a reputation for prosecuting complex antitrust and consumer class actions with vigor, innovation, and success. Pomerantz's Antitrust and Consumer Group has recovered billions of dollars for the Firm's business and individual clients and the classes that they represent. Time and again, Pomerantz has protected our free-market system from anticompetitive conduct such as price fixing, monopolization, exclusive territorial division, pernicious pharmaceutical conduct, and false advertising. Pomerantz's advocacy has spanned across diverse product markets, exhibiting the Antitrust and Consumer Group's versatility to prosecute class actions on any terrain.

Pomerantz has served and is currently serving in leadership or Co-Leadership roles in several high-profile multi-district litigation class actions. In December 2018, the Firm achieved a $31 billion partial settlement with three defendants on behalf of a class of U.S. lending institutions that originated, purchased or held loans paying interest rates tied to the U.S. Dollar London Interbank Offered Rate (USD LIBOR). It is alleged that the class suffered damages as a result of collusive manipulation by the LIBOR contributor panel banks that artificially suppressed the USD LIBOR rate during the class period, causing the class members to receive lower interest payments than they would have otherwise received. *In re Libor Based Financial Instruments Antitrust Litig.,* 1:11-md-2262.

Pomerantz represented baseball and hockey fans in a game-changing antitrust class action against Major League Baseball and the National Hockey League, challenging the exclusive territorial division of live television broadcasts, internet streaming, and the resulting geographic blackouts. *See Laumann v. NHL* and *Garber v. MLB* (S.D.N.Y. 2012).

Pomerantz has spearheaded the effort to challenge harmful anticompetitive conduct by pharmaceutical companies—including Pay-for-Delay Agreements—that artificially inflates the price of prescription drugs by keeping generic versions off the market.

Even prior to the 2013 precedential U.S. Supreme Court decision in *Actavis*, Pomerantz litigated and successfully settled the following generic-drug-delay cases:

- *In re Flonase Antitrust Litig.* (E.D. Pa. 2008) ($35 million);
- *In re Toprol XL Antitrust Litig.* (D. Del. 2006) ($11 million); and

- *In re Wellbutrin SR Antitrust Litig.* (E.D. Pa. 2004) ($21.5 million).

Other exemplary victories include Pomerantz's prominent role in *In re NASDAQ Market-Makers Antitrust Litigation* (S.D.N.Y.), which resulted in a settlement in excess of $1 billion for class members, one of the largest antitrust settlements in history. Pomerantz also played prominent roles in *In re Sorbates Direct Purchaser Antitrust Litigation* (N.D. Cal.), which resulted in over an $82 million recovery, and in *In re Methionine Antitrust Litigation* (N.D. Cal.), which resulted in a $107 million recovery. These cases illustrate the resources, expertise, and commitment that Pomerantz's Antitrust Group devotes to prosecuting some of the most egregious anticompetitive conduct.

Strategic Consumer Litigation

Pomerantz represents consumers in strategic consumer litigation, namely, actions that recover monetary relief on behalf of class members while also advocating for important consumer rights. We have successfully prosecuted claims involving California's Unfair Competition Law, California's Consumer Legal Remedies Act, the Song Beverly Consumer Warranty Act and the Song Beverly Credit Card Act. Pomerantz attorneys have resolved data breach privacy cases and cases involving unlawful recording, illegal background checks, unfair business practices, misleading advertising and other consumer finance related actions. Attorneys at Pomerantz also have been Lead Counsel in the prosecution and successful resolution of major nationwide class actions against Nissan, Ford, Volkswagen, BMW, Toyota, Chrysler and General Motors arising out of failures to disclose car defects. All of these actions also have involved significant changes to defendants' business practices.

A Global Advocate for Asset Managers and Public and Taft-Hartley Pension Funds

Pomerantz represents some of the largest pension funds, asset managers, and institutional investors around the globe, monitoring assets of $5 trillion, and growing. Utilizing cutting-edge legal strategies and the latest proprietary techniques, Pomerantz protects, expands, and vindicates shareholder rights through our securities litigation services and portfolio monitoring program.

Pomerantz partners routinely advise foreign and domestic institutional investors on how best to evaluate losses to their investment portfolios attributable to financial misconduct and how best to maximize their potential recoveries worldwide. In particular, Pomerantz Partners, Jeremy Lieberman, Patrick Dahlstrom, Jennifer Pafiti, and Marc Gross regularly travel throughout the U.S. and across the globe to meet with clients on these issues and are frequent speakers at investor conferences and educational forums in North America, Europe, and the Middle East.

Institutional Investor Services

Pomerantz offers a variety of services to institutional investors. Through the Firm's proprietary system, PomTrack®, Pomerantz monitor client portfolios to identify and evaluate potential and pending securities fraud, ERISA and derivative claims, and class action settlements. Monthly customized PomTrack® reports are included with the service.

When a potential securities fraud claim impacting a client is identified, Pomerantz offers to thoroughly analyze the case's merits and provide a written analysis and recommendation. If litigation is warranted, a team of highly skilled attorneys will provide efficient and effective legal representation. The experience and expertise of our attorneys – which have consistently been acknowledged by the courts – allow Pomerantz to vigorously pursue the claims of investors, taking complex cases to trial when warranted.

Pomerantz is committed to ensuring that companies adhere to responsible business practices and practice good corporate citizenship. The Firm strongly support policies and procedures designed to give shareholders the ability to oversee the activities of a corporation. Pomeranz has successfully utilized litigation to bring about corporate governance reform, and always considers whether such reforms are appropriate before any case is settled.

Pomerantz provides clients with insightful and timely commentary on matters essential to effective fund management in our bi-monthly newsletter, *The Pomerantz Monitor* and regularly sponsors conferences and roundtable events around the globe with speakers who are experts in securities litigation and corporate governance matters.

Attorneys

Partners

Jeremy A. Lieberman

Jeremy A. Lieberman is Pomerantz's Managing Partner. Jeremy became associated with the Firm in August 2004 and was elevated to Partner in January 2010. He was honored as Benchmark Litigation's 2019 Plaintiff Attorney of the Year. In 2018, Jeremy was honored as a Titan of the Plaintiffs Bar by Law360 and as a Benchmark Litigation Star. The Pomerantz team that Jeremy leads was named a 2018 Securities Practice Group of the Year. Jeremy has been honored as a Super Lawyers® "Top-Rated Securities Litigation Attorney" in 2016, 2017, and 2018 – a recognition bestowed on no more than 5% of eligible attorneys in the New York Metro area. The Legal 500, in honoring Pomerantz as a Leading Firm for 2016 and 2017, stated that in New York, "Jeremy Lieberman is super impressive – a formidable adversary for any defense firm."

Jeremy led the litigation of *In re Petrobras Securities Litigation,* a closely-watched securities class action arising from a multi-billion-dollar kickback and bribery scheme involving Brazil's largest oil company, Petróleo Brasileiro S.A. – Petrobras, in which Pomerantz was sole Lead Counsel. The biggest instance of

corruption in the history of Brazil ensnared not only Petrobras' former executives but also Brazilian politicians, including former president Lula da Silva and one-third of the Brazilian Congress. In January and February 2018, Jeremy achieved a historic $3 billion settlement for the Class. This is not only the largest securities class action settlement in a decade but is the largest settlement ever in a securities class action involving a foreign issuer, the fifth-largest securities class action settlement ever achieved in the United States, the largest securities class action settlement achieved by a foreign Lead Plaintiff, and the largest securities class action settlement in history not involving a restatement of financial reports.

Jeremy also secured a significant victory for Petrobras investors at the Second Circuit Court of Appeals, when the court rejected the heightened ascertainability requirement for obtaining class certification that had been imposed by the Third Circuit Courts of Appeals. The ruling will have a positive impact on plaintiffs in securities fraud litigation. Indeed, the *Petrobras* litigation was honored in 2019 as a National Impact Case by Benchmark Litigation.

In January 2019, Jeremy achieved a $27 million settlement for the Class, pending court approval, in *Strougo v. Barclays PLC*, a high-profile securities class action in which Pomerantz is Lead Counsel. Plaintiffs allege that Barclays PLC misled institutional investors about the manipulation of the banking giant's so-called "dark pool" trading systems in order to provide a trading advantage to high-frequency traders over its institutional investor clients. This case turns on the duty of integrity owed by Barclays to its clients. In November 2017, he achieved precedent-setting victories for investors, when the Second Circuit Court of Appeals held that direct evidence of price impact is not always necessary to demonstrate market efficiency to invoke the presumption of reliance, and that defendants seeking to rebut the presumption of reliance must do so by a preponderance of the evidence rather than merely meeting a burden of production.

Jeremy led the Firm's high-profile class action litigation against Yahoo! Inc., in which Pomerantz, as Lead Counsel, achieved an $80 million settlement for the Class in 2018. The case involved the biggest data breaches in U.S. history, in which over 3 billion Yahoo accounts were compromised.

In 2018 Jeremy achieved a $3,300,000 settlement for the Class in the Firm's securities class action against Corinthian Colleges, one of the largest for-profit college systems in the country, for alleged misrepresentations about its job placement rates, compliance with applicable regulations, and enrollment statistics. Pomerantz prevailed in the motion to dismiss the proceedings, a particularly noteworthy victory because Chief Judge George King of the Central District of California had dismissed two prior lawsuits against Corinthian with similar allegations. *Erickson v. Corinthian Colleges, Inc.* (C.D. Cal.).

Jeremy led the Firm's litigation team that in 2018 secured a $31 million partial settlement with three defendants in *In re Libor Based Financial Instruments Antitrust Litigation*, a closely-watched multi-district litigation, which concerns the London Interbank Offered Rate (LIBOR) rigging scandal.

Jeremy heads the Firm's recently filed individual action against pharmaceutical giant Teva Pharmaceutical Industries Ltd., Teva Pharmaceuticals USA, Inc. (together, "Teva"), and certain of Teva's current and former employees and officers relating to alleged anticompetitive practices in Teva's sales of generic drugs. *Clal Insurance Company Ltd. v. Teva Pharmaceutical Industries Ltd.*

Jeremy also serves as Lead Counsel in a number of the most high-profile securities class actions pending in the U.S. courts, such as *In re Mylan N.V. Securities Litigation, In re Perrigo Co. Securities Litigation,* and *In re Fiat Chrysler Automobiles N.V. Securities Litigation.*

In *In re China North East Petroleum Corp. Securities Litigation*, Jeremy achieved a significant victory for shareholders in the United States Court of Appeals for the Second Circuit, whereby the Appeals Court ruled that a temporary rise in share price above its purchase price in the aftermath of a corrective disclosure did not eviscerate an investor's claim for damages. The Second Circuit's decision was deemed "precedential" by the *New York Law Journal* and provides critical guidance for assessing damages in a § 10(b) action.

Jeremy had an integral role in *In re Comverse Technology, Inc. Securities Litigation*, in which he and his partners achieved a historic $225 million settlement on behalf of the Class, which was the second-largest options backdating settlement to date.

Jeremy regularly consults with Pomerantz's international institutional clients, including pension funds, regarding their rights under the U.S. securities laws. Jeremy is working with the Firm's international clients to craft a response to the Supreme Court's ruling in *Morrison v. National Australia Bank, Ltd*., which limited the ability of foreign investors to seek redress under the federal securities laws. Currently, Jeremy is representing several UK and EU pension funds and asset managers in individual actions against BP plc in the United States District Court for the Southern District of Texas.

Jeremy is a frequent lecturer regarding current corporate governance and securities litigation issues. In March 2017, he spoke at the ICGN conference in Washington D.C., regarding recent trends in foreign securities litigation. He also recently led a discussion regarding U.S. securities class actions in Paris, France.

Jeremy graduated from Fordham University School of Law in 2002. While in law school, he served as a staff member of the *Fordham Urban Law Journal*. Upon graduation, he began his career at a major New York law firm as a litigation associate, where he specialized in complex commercial litigation.

Jeremy is admitted to practice in the State of New York; the U.S. District Courts for the Southern and Eastern Districts of New York, the Southern District of Texas, the District of Colorado, the Eastern District of Michigan and Northern District of Illinois; the U.S. Courts of Appeals for the Second, Third, Fourth, Sixth, Ninth, and Tenth Circuits; and the United States Supreme Court.

Patrick V. Dahlstrom

Patrick Dahlstrom joined Pomerantz as an associate in 1991 and was elevated to Partner in January 1996. He was Co-Managing Partner with Jeremy Lieberman in 2017 and 2018 and is now Senior Partner. Patrick is based in the Firm's Chicago office. He was honored as a Super Lawyers® "Top-Rated Securities Litigation Attorney" in 2018.

Patrick, a member of the Firm's Institutional Investor Practice and New Case Groups, has extensive experience litigating cases under the PSLRA. He led *In re Comverse Technology, Inc. Securities Litigation*,

No. 06-CV-1825 (E.D.N.Y.), in which the Firm, as Lead Counsel, recovered a $225 million settlement for the Class – the second-highest ever for a case involving back-dating options, and one of the largest recoveries ever from an individual officer-defendant, the company's founder and former CEO. In *Comverse*, the Firm obtained an important clarification of how courts calculate the "largest financial interest" in connection with the selection of a Lead Plaintiff, in a manner consistent with *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336 (2005). Judge Garaufis, in approving the settlement, lauded Pomerantz: "The court also notes that, throughout this litigation, it has been impressed by Lead Counsel's acumen and diligence. The briefing has been thorough, clear, and convincing, and ... Lead Counsel has not taken short cuts or relaxed its efforts at any stage of the litigation."

In *DeMarco v. Robertson Stephens Inc.*, 228 F.R.D. 468 (S.D.N.Y. 2005), Patrick obtained the first class certification in a federal securities case involving fraud by analysts.

Patrick's extensive experience in litigation under the PSLRA has made him an expert not only at making compelling arguments on behalf of Pomerantz' clients for Lead Plaintiff status, but also in discerning weaknesses of competing candidates. *In re American Italian Pasta Co. Securities Litigation* and *Comverse* are the most recent examples of his success in getting our clients appointed sole Lead Plaintiff despite competing motions by numerous impressive institutional clients.

Patrick was a member of the trial team in *In re ICN/Viratek Securities Litigation* (S.D.N.Y. 1997), which, after trial, settled for $14.5 million. Judge Wood praised the trial team: "[P]laintiffs counsel did a superb job here on behalf of the class. ...This was a very hard fought case. You had very able, superb opponents, and they put you to your task. ...The trial work was beautifully done and I believe very efficiently done."

Patrick's speaking engagements include interviews by NBC and the CBC regarding securities class actions, and among others, a presentation at the November 2009 State Association of County Retirement Systems Fall Conference as the featured speaker at the Board Chair/Vice Chair Session entitled: "Cleaning Up After the 100 Year Storm. How trustees can protect assets and recover losses following the burst of the housing and financial bubbles."

Patrick is a 1987 graduate of the Washington College of Law at American University in Washington, D.C., where he was a Dean's Fellow, Editor in Chief of the *Administrative Law Journal*, a member of the Moot Court Board representing Washington College of Law in the New York County Bar Association's Antitrust Moot Court Competition, and a member of the Vietnam Veterans of America Legal Services/Public Interest Law Clinic. Upon graduating, Patrick served as the Pro Se Staff Attorney for the United States District Court for the Eastern District of New York and was a law clerk to the Honorable Joan M. Azrack, United States Magistrate Judge.

Patrick is admitted to practice in New York and Illinois, the United States District Courts for the Southern and Eastern Districts of New York, Northern District of Illinois, Northern District of Indiana, Eastern District of Wisconsin, District of Colorado, Western District of Pennsylvania, the United States Courts of Appeals for the First, Fourth, Sixth, Seventh, Eighth, and Ninth Circuits, and the United States Supreme Court.

Gustavo F. Bruckner

Gustavo F. Bruckner heads Pomerantz's Corporate Governance practice area, which enforces shareholder rights and prosecutes litigation challenging corporate actions that harm shareholders. Under Gustavo's leadership, the Corporate Governance group has achieved numerous noteworthy litigation successes. He has been quoted frequently by Bloomberg, Law360, The New York Times, and Reuters, and was honored in 2016, 2017, and 2018 by Super Lawyers® as a "Top-Rated Securities Litigation Attorney," a recognition bestowed on no more than 5% of eligible attorneys in the New York Metro area. Gustavo regularly appears in state and federal courts across the nation.

In September 2017, Gustavo's Corporate Governance team achieved a settlement in New Jersey Superior Court that provided non-pecuniary benefits for a non-opt out class, in Pomerantz's litigation against Ocean Shore Holding Co. In approving the settlement, Judge Julio Mendez, of Cape May County Chancery Division, became the first New Jersey state court judge to formally adopt the Third Circuit's nine-part *Girsh* factors, *Girsh v. Jepson*, 521 F.2d 153 (3d Cir. 1975). Never before has there been a published New Jersey state court opinion setting out the factors a court must consider in evaluating whether a class action settlement should be determined to be fair and adequate.

Gustavo successfully argued *Strougo v. Hollander*, C.A. No. 9770-CB (Del. Ch. 2015), obtaining a landmark ruling in Delaware that bylaws adopted after shareholders are cashed out do not apply to shareholders affected by the transaction. In the process, Gustavo and the Corporate Governance team beat back a fee-shifting bylaw and were able to obtain a 25% price increase for members of the class cashed out in the "going private" transaction. Shortly thereafter, the Delaware Legislature adopted legislation to ban fee-shifting bylaws.

In *Stein v. DeBoer* (Or. Cir. Ct. 2017), Gustavo and the Corporate Governance group achieved a settlement that provides significant corporate governance therapeutics on behalf of shareholders of Lithia Motors, Inc. The company's board had approved, without meaningful review, the Transition Agreement between the company and Sidney DeBoer, its founder, controlling shareholder, CEO, and Chairman, who was stepping down as CEO. DeBoer and his son, the current CEO, negotiated virtually all the material terms of the Agreement, by which the company agreed to pay the senior DeBoer $1,060,000 and a $42,000 car allowance annually for the rest of his life, plus other benefits, in addition to the $200,000 per year that he would receive for continuing to serve as Chairman.

In *Miller v. Bolduc*, No. SUCV 2015-00807 (Mass. Sup. Ct. 2015), Gustavo and the Corporate Governance group, by initiating litigation, caused Implant Sciences to hold its first shareholder annual meeting in 5 years and to place an important compensation grant up for a shareholder vote.

In *Strougo v. North State Bancorp*, No. 15 CVS 14696 (N.C. Super. Ct. 2015), Gustavo and the Corporate Governance team caused the North State Bancorp merger agreement to be amended to provide a "majority of the minority" provision for common shareholders in connection with the shareholder vote on the merger. As a result of the action, common shareholders had the ability to stop the merger if they did not wish it to go forward.

In *Hallandale Beach Police Officers and Firefighters' Personnel Retirement Fund vs. Lululemon athletica, Inc.*, C.A. No. 8522-VCP (Del. Ch. 2014), in an issue of first impression in Delaware, Gustavo successfully

argued for the production of the company chairman's Rule 10b5-1 stock trading plan. The court found that a stock trading plan established by the company's chairman, pursuant to which a broker, rather than the chairman himself, would liquidate a portion of the chairman's stock in the company, did not preclude potential liability for insider trading.

Gustavo was Co-Lead Counsel in *In re Great Wolf Resorts, Inc. Shareholders Litigation*, C.A. No. 7328-VCN (Del. Ch. 2012), obtaining the elimination of stand-still provisions that allowed third parties to bid for Great Wolf Resorts, Inc., resulting in the emergence of a third-party bidder and approximately $94 million (57%) in additional merger consideration for Great Wolf shareholders.

Gustavo received his law degree in 1992 from the Benjamin N. Cardozo School of Law, where he served as an editor of the Moot Court Board and on the Student Council. Upon graduation, he received the award for outstanding student service.

After graduating law school, Gustavo served as Chief-of-Staff to a New York City legislator.

Gustavo is a Mentor and Coach to the NYU Stern School of Business, Berkley Center for Entrepreneurial Studies, New Venture Competition. He was a University Scholar at NYU where he obtained a B.S. in Marketing and International Business in 1988 and an MBA in Finance and International Business in 1989.

Gustavo is a Trustee and the Treasurer of the Beit Rabban Day School, and an arbitrator in the Civil Court of the City of New York.

Gustavo is licensed to practice in New York and New Jersey and is admitted to practice before the United States District Court for the Eastern, Northern, and Southern Districts of New York, the United States District Court for the District of New Jersey, United States Court of Appeals for the Second and Seventh Circuits, and the United States Supreme Court.

Emma Gilmore

Emma Gilmore is a partner at the Firm and is regularly involved in high-profile class-action litigation. In 2018, Emma was honored as an MVP in Securities Litigation, part of an "elite slate of attorneys [who] have distinguished themselves from their peers by securing hard-earned successes in high-stakes litigation, complex global matters and record-breaking deals." Only up to six attorneys nationwide are selected each year as MVPs in Securities Litigation. Emma is only the third woman in that practice group to have received this outstanding award since it was initiated in 2011. Emma was also honored as a 2018 Super Lawyer® in the New York Metro area.

Emma is a Fellow of the American Bar Foundation, an honorary society of lawyers, judges, law faculty and legal scholars who have demonstrated outstanding leadership in the profession. Membership is limited to one percent of the lawyers admitted to practice in the United States and includes the leading US lawyers.

Emma recently played a leading role in the Firm's class action case in the Southern District of New York against Brazil's largest oil company, Petrobras, arising from a multi-billion-dollar kickback and bribery scheme, in which the Firm was sole Lead Counsel. The biggest instance of corruption in the history of

Brazil had ensnared not only Petrobras' former executives but also Brazilian politicians, including former president Lula da Silva and one-third of the Brazilian Congress. Emma was the principal drafter of the complaint. She deposed and defended numerous fact and expert witnesses, including deposing the former CEO of Petrobras, the whistleblower, and the chief accountant. She was also the principal drafter of the appellate brief and played an instrumental role in securing a significant victory for investors in this case at the Second Circuit Court of Appeals, when the Court rejected the heightened ascertainability requirement for obtaining class certification that had been imposed by other circuit courts. She opposed defendants' petition for a writ of certiorari to the Supreme Court. In a significant victory for investors, Pomerantz has achieved a historic $3 billion settlement with Petrobras. This is not only the largest securities class action settlement in a decade but is the largest settlement ever in a class action involving a foreign issuer, the fifth-largest class action settlement ever achieved in the United States, and the largest settlement achieved by a foreign lead plaintiff.

Emma played a leading role in *Strougo v. Barclays PLC*, a high-profile securities class action that alleges Barclays PLC misled institutional investor clients about the extent of the banking giant's use of so-called "dark pool" trading systems. She drafted the complaint and defeated defendants' efforts to dismiss the action and more recently contributed to securing an important precedent-setting opinion from the Second Circuit. Emma organized a group of leading evidence experts who filed amicus briefs supporting plaintiffs' position in the Second Circuit.

Together with managing partner Jeremy Lieberman, Emma leads the securities class action litigation against Philip Morris International, arising from the development of its Reduced Risk smoking products.

Emma also plays a leading role in the Firm's class action litigation against Arconic, arising from the deadliest U.K. fire in more than a century.

She also represents Safra Bank in a class action against Samarco Mineração S.A., in connection with the Fundao dam-burst disaster, which is widely regarded as the worst environmental disaster in Brazil's history.

Emma played a leading role in the high-profile class action litigation against Yahoo! Inc., in which the Firm, as Lead Counsel, achieved an $80 million settlement for the Class. The case involved the biggest data breaches in U.S. history, in which over 3 billion Yahoo accounts were compromised.

Among other cases, Emma is part of the team prosecuting securities fraud claims against BP on behalf of many foreign and domestic public and private pension funds arising from the company's 2010 Deepwater Horizon oil spill. *In re BP p.l.c. Sec. Litig.*, No. 10-md-2185 (S.D. Tex.). She helped devise a cutting-edge strategy that established the right of individual foreign investors who purchased foreign-traded shares of a foreign corporation to pursue claims for securities fraud in a U.S. court, thereby overcoming obstacles created by the U.S. Supreme Court's 2010 decision in *Morrison v. National Australia Bank Ltd*.

Emma secured a unanimous decision by a panel of the Ninth Circuit Court of Appeals, benefitting defrauded investors in *Costa Brava Partnership III LP v. ChinaCast Education Corp*. In an issue of first impression, the Ninth Circuit held that imputation of the CEO's scienter to the company was warranted

vis-a-vis innocent third parties, despite the fact that the executive acted for his own benefit and to the company's detriment.

She has also devoted a significant amount of time to pro bono matters. She played a critical role in securing a unanimous ruling by the Arkansas Supreme Court striking down as unconstitutional a state law banning cohabiting individuals from adopting children or serving as foster parents. The ruling was a relief for the 1,600-plus children in the state of Arkansas who needed a permanent family. The litigation generated significant publicity, including coverage by the Arkansas Times, the Wall Street Journal, and the New York Times.

Before joining Pomerantz, Emma was a litigation associate with the firms of Skadden, Arps, Slate, Meagher and Flom, LLP, and Sullivan & Cromwell, LLP, where she was involved in commercial and securities matters. Her experience includes working on the *WorldCom Securities Litigation,* representing more than a dozen prominent banks and also representing clients such as General Electric, Columbia University, Samsung, LG Electronics, Sony, Philips, BT, and JVC.

She also served as a law clerk to the Honorable Thomas C. Platt, former U.S. Chief Judge for the Eastern District of New York.

Emma graduated *cum laude* from Brooklyn Law School, where she served as a staff editor for the *Brooklyn Law Review*. She was the recipient of two CALI Excellence for the Future Awards, being the highest scoring student in the subjects of evidence and discovery. She graduated *summa cum laude* from Arizona State University, with a BA in French and a minor in Business.

She serves on the Firm's Anti-Harassment and Discrimination Committee.

Michael Grunfeld

Michael Grunfeld joined Pomerantz in July 2017 as Of Counsel and was elevated to Partner in 2019. He has extensive experience in securities, complex commercial, and white-collar matters in federal and state courts around the country. In particular, Michael has represented issuers, underwriters, and individuals in securities class actions dealing with a wide variety of industries. He has also represented financial institutions and individuals in cases related to RMBS, securities lending, foreign exchange practices, insider trading, and other financial matters. Michael was honored in 2018 as a Super Lawyers® Rising Star.

Michael is the co-author of a chapter on damages in securities class actions in the LexisNexis treatise, *Litigating Securities Class Actions*.

Michael served as a clerk for Judge Ronald Gilman of the Sixth Circuit Court of Appeals and as a foreign law clerk for Justice Asher Grunis of the Israeli Supreme Court. Before joining Pomerantz, he was a litigation associate at Shearman & Sterling LLP and Paul, Weiss, Rifkind, Wharton & Garrison LLP. Michael graduated from Columbia Law School in 2008, where he was a Harlan Fiske Stone Scholar and Submissions Editor of the Columbia Business Law Review. He graduated from Harvard University with an A.B. in Government, *magna cum laude*, in 2004.

Michael is admitted to practice in the State of New York, the Second, Fourth, and Sixth Circuit Courts of Appeals, and the United States District Courts for the Southern and Eastern Districts of New York.

Jordan L. Lurie

Jordan L. Lurie joined Pomerantz as a partner in the Los Angeles office in December 2018. Jordan heads Pomerantz's Strategic Consumer Litigation practice.

Jordan has litigated shareholder class and derivative actions, complex corporate securities and consumer litigation, and a wide range of fraud and misrepresentation cases brought under state and federal consumer protection statutes involving unfair competition, false advertising, and privacy rights. Among his notable representations, Jordan served as Lead Counsel in the prosecution and successful resolution of major nationwide class actions against Nissan, Ford, Volkswagen, BMW, Toyota, Chrysler and General Motors. He also successfully preserved a multi-million dollar nationwide automotive class action settlement by convincing the then Chief Judge of the Ninth Circuit and his wife, who were also class members and had filed objections to the settlement, to withdraw their objections and endorse the settlement.

Jordan has argued cases in the California Court of Appeals and in the Ninth Circuit that resulted in published opinions establishing class members' rights to intervene and clarifying the standing requirements for an objector to appeal. He also established a Ninth Circuit precedent for obtaining attorneys' fees in a catalyst fee action. Jordan has tried a federal securities fraud class action to verdict. He has been a featured speaker at California Mandatory Continuing Legal Education seminars and is a trained ombudsman and mediator.

Outside of his legal practice, Jordan is an active educator and community leader and has held executive positions in various organizations in the Los Angeles community. Jordan participated in the first Wexner Heritage Foundation leadership program in Los Angeles and the first national cohort of the Board Member Institute for Jewish Nonprofits at the Kellogg School of Management.

Prior to joining Pomerantz, Jordan was the Managing Partner of the Los Angeles office of Weiss & Lurie and Senior Litigator at Capstone Law APC.

Jordan graduated cum laude from Yale University in 1984 with a B.A in Political Science and received his law degree in 1987 from the University of Southern California Law Center, where he served as Notes Editor of the *University of Southern California Law Review*.

Jordan is a member of the State Bar of California and has been admitted to practice before the United States District Courts for the Northern, Southern, Central and Eastern Districts of California, the Eastern and Western Districts of Michigan, and the District of Colorado.

Jennifer Pafiti

Jennifer Pafiti became associated with the Firm in May 2014 and was elevated to Partner in December 2015. A dually qualified U.K. solicitor and U.S. attorney, she is the Firm's Head of Client Services and also takes an active role in complex securities litigation, representing clients in both class and non-class

action securities litigation. In 2019 Jennifer was named to Benchmark Litigation's exclusive *40 & Under Hot List* of the best young attorneys in the United States and was honored by Super Lawyers® as a Southern California Rising Star. In 2018, Jennifer was recognized as a Lawyer of Distinction, an honor bestowed upon less than 10% of attorneys in any given state. She was honored by Super Lawyers® in 2017 as both a Rising Star and one of the Top Women Attorneys in Southern California. In 2016, the *Daily Journal* selected Jennifer for its prestigious "Top 40 Under 40" list of the best young attorneys in California.

Jennifer was an integral member of the Firm's litigation team for *In re Petrobras Securities Litigation,* a case relating to a multi-billion-dollar kickback and bribery scheme at Brazil's largest oil company, Petróleo Brasileiro S.A.- Petrobras, in which the Firm was sole Lead Counsel. She helped secure a significant victory for investors in this case at the Second Circuit Court of Appeals, when the court rejected the heightened ascertainability requirement for obtaining class certification that had been imposed by other Circuit courts such as the Third and Sixth Circuit Courts of Appeals. Working closely with Lead Plaintiff, Universities Superannuation Scheme Limited, she was also instrumental in achieving the historic settlement of $3 billion for Petrobras investors. This is not only the largest securities class action settlement in a decade but is the largest settlement ever in a securities class action involving a foreign issuer, the fifth-largest securities class action settlement ever achieved in the United States, the largest securities class action settlement achieved by a foreign Lead Plaintiff, and the largest securities class action settlement in history not involving a restatement of financial reports.

Jennifer is also involved in the litigations of *Dabe v. Calavo Growers*, *Flynn v. Sientra, Inc., Isensee v. KaloBios, Robb v. FitBit, Inc., Monachelli v. Hortonworks, Inc., Plumley v. Sempra Energy, and Greenberg v. Sunrun, Inc.,* in which the Firm is Lead Counsel.

Jennifer earned a Bachelor of Science degree in Psychology at Thames Valley University in England, prior to studying law. She earned her law degrees at Thames Valley University (G.D.L.) and the Inns of Court School of Law (L.P.C.) in the U.K. Jennifer is admitted to practice law in England and Wales (Solicitor) and in California.

Before studying law in England, Jennifer was a regulated financial advisor and senior mortgage underwriter at a major U.K. financial institution. She holds full CeFA and CeMAP qualifications. After qualifying as a Solicitor, Jennifer specialized in private practice civil litigation, which included the representation of clients in high-profile cases in the Royal Courts of Justice. Prior to joining Pomerantz, Jennifer was an associate with Robbins Geller Rudman & Dowd LLP in their San Diego office.

Jennifer regularly travels throughout the U.S. and Europe to advise clients on how best to evaluate losses to their investment portfolios attributable to financial fraud or other misconduct, and how best to maximize their potential recoveries.

Jennifer serves on the Honorary Steering Committee of Equal Rights Advocates ("ERA"), which focuses on specific issues that women face in the legal profession. ERA is an organization that protects and expands economic and educational access and opportunities for women and girls.

Jennifer is a member of the National Association of Pension Fund Attorneys and represents the Firm as a member of the California Association of Public Retirement Systems, the State Association of County

Retirement Systems, the National Association of State Treasurers, the National Conference of Employee Retirement Systems, the Texas Association of Public Employee Retirement Systems, and the U.K.'s National Association of Pension Funds.

Jennifer is admitted to practice in England and Wales; the State of California; and the United States District Courts for the Northern, Central and Southern Districts of California. She is based in Los Angeles.

Joshua B. Silverman

Joshua B. Silverman specializes in individual and class action securities litigation. He was Lead Counsel in *In re Groupon, Inc. Securities Litigation,* achieving a $45 million settlement, representing one of the highest recoveries as a percentage of damages in the Seventh Circuit. Josh was also Co-Lead Counsel in *In re MannKind Corp. Securities Litigation*, reaching a settlement valued at more than $23 million and setting precedent regarding the use of expert information in a shareholder complaint. He served as Co-Lead Counsel for three large public funds in *New Mexico State Investment Council v. Countrywide Financial Corp.,* resulting in a very favorable confidential settlement. He regularly represents clients in controversies involving securities fraud, private equity investments, hedge fund investments, structured financial instruments, securities lending arrangements, and investment consultants. In addition, Josh was Co-Lead Counsel in *New Mexico State Investment Council v. Cheslock Bakker & Associates* (summary judgment award in excess of $30 million), played a key role in the Firm's representation of investors before the United States Supreme Court in *StoneRidge,* and prosecuted many of the Firm's other class cases, including *In re Sealed Air Corp. Securities Litigation* ($20 million settlement), *Bruce v. Suntech Power Holdings Corp.* ($5 million settlement); *In re AgFeed, Inc. Securities Litigation* ($7 million settlement); and *In re Hemispherx BioPharma Securities Litigation* ($2.75 million settlement).

Before joining Pomerantz, Josh practiced at McGuireWoods LLP and its Chicago predecessor, Ross & Hardies, where he represented one of the largest independent futures commission merchants in commodities fraud and civil RICO cases. He also spent two years as a securities trader, and continues to actively trade stocks, futures, and options for his own account.

Josh is a 1993 graduate of the University of Michigan, where he received Phi Beta Kappa honors, and a 1996 graduate of the University of Michigan Law School.

Josh is admitted to practice in Illinois, the United States District Court for the Northern District of Illinois, the United States Courts of Appeal for the First, Second, Third, Seventh and Eighth Circuits, and the United States Supreme Court.

Leigh Handelman Smollar

Leigh Handelman Smollar, formerly Of Counsel to Pomerantz, was elevated to Partner in January 2012.

As a member of Pomerantz' Securities Litigation Group, Leigh plays a key role in litigating class actions against public companies for securities fraud. She was a member of the Pomerantz team in its successful litigation on behalf of three New Mexico pension funds related to Countrywide's mortgage-backed securities, resulting in a very favorable confidential settlement. Leigh has been a member of the Pomerantz litigation team for many of the cases where significant settlements were obtained. *See In re Sealed Air Corp. Sec. Litig.*, No. 03-CV-4372 (D.N.J.) ($20 million settlement approved December 2009);

and *In re Safety-Kleen Stockholders Sec. Litig.*, No. 00-736-17 (D.S.C.) (as Co-Lead Counsel, Firm obtained a $54.5 million settlement).

In 2015, Leigh published an article in the Loyola Law Journal entitled, *The Importance of Conducting Thorough Investigations of Confidential Witnesses in Securities Fraud Litigation*. She has authored several articles and updates for the Illinois Institute for Continuing Legal Education (IICLE), including *Shareholder Derivative Suits and Stockholder Litigation in Illinois*, published in IICLE Chancery and Special Remedies 2004 Practice Handbook; *Prosecuting Securities Fraud Class Actions*, published in IICLE Chancery and Special Remedies 2009 Practice Handbook, including a 2011 supplement to Chancery and Special Remedies; and a new chapter in the 2013 Edition of the Chancery and Special Remedies Practice Handbook. In June 2011, as a panelist at the Illinois Public Employee Retirement Systems Summit in Chicago, Illinois, Leigh gave a presentation entitled *Carrying out Fiduciary Responsibilities in Management and Investments*.

Leigh is currently litigating *In re Galena Biopharma, Inc.*, No. 14-cv-00367 (D. Or.); *Alizadeh v. Tellabs, Inc.*, No. 13-cv-537 (N.D. Ill.); *Lubbers v. Flagstar Bancorp, Inc.*, No. 14-cv-13459 (E.D. MI); and *Cooper v. Thoratec Corp.*, No. 14-cv-360 (N.D. Cal.).

She is a 1993 graduate of the University of Illinois at Champaign-Urbana, where she graduated from the School of Commerce with high honors, and a 1996 graduate of the Chicago-Kent College of Law. Leigh spent the next five years specializing in insurance defense litigation.

Leigh is admitted to practice in Illinois, the United States District Court for the Northern District of Illinois, and the United States Courts of Appeals for the Seventh and Eighth Circuits.

Matthew L. Tuccillo

Matthew L. Tuccillo joined Pomerantz in 2011 and was elevated to Partner in December 2013. He is responsible, on an ongoing basis, for the Firm's litigation of numerous securities fraud class actions pending nationwide, currently including: *In re Toronto-Dominion Bank Securities Litigation*, 1:17-cv-01735 (D.N.J.); *Chun v. Fluor Corp., et al.*, No. 3:18-cv-01338-S (N.D. Tex.); and *Heuschen v. Sibanye Gold Ltd., et al.*, No. 1:18-cv-03902 (E.D.N.Y.).

Matt oversees and is the lead litigator on the Firm's securities fraud lawsuits arising from BP's 2010 Gulf oil spill, pending in Multidistrict Litigation 2185, *In re BP p.l.c. Secs. Litig*., No. 4:10-md-2185 (S.D. Tex.). He briefed and argued successful oppositions to three rounds of BP's motions to dismiss the claims of roughly 100 institutional investors, drawing the court's praise for the "quality of lawyering," which it called "uniformly excellent." In leading the BP litigation, Matt has secured some of the Firm's most ground-breaking rulings:

- He successfully argued that foreign and domestic investors had asserted viable "holder claims" seeking to recover investment losses due to their retention of already-owned shares in reliance upon the fraud, which is believed to be the first ruling by a U.S. court sustaining such a theory under English common law.

- He successfully argued against *forum non conveniens* dismissal, obtaining the first ruling after the Supreme Court's decision in *Morrison v. Nat'l Australia Bank Ltd.*, 130 S. Ct. 2869 (2010) to

permit foreign investors pursuing foreign law claims to seek recovery for losses on a foreign stock exchange in a U.S. court.

- He successfully argued that the Securities Litigation Uniform Standards Act of 1998 (SLUSA), which extinguishes U.S. state law claims in deference to the U.S. federal securities laws, should not be extended to foreign common law claims being pursued by both domestic and foreign investors.

Matt also fulfills Pomerantz's roles as MDL 2185 Individual Action Plaintiffs Steering Committee member and sole Liaison with BP and the Court. The Firm's BP clients include 32 public and private pension funds, investment management firms, limited partnerships, and investment trusts from the U.S., Canada, the U.K., France, the Netherlands, and Australia, seeking recovery for losses in BP's common stock (traded on the London Stock Exchange) and American Depository Shares (traded on the NYSE).

As the Firm's lead litigator in *Perez v. Higher One Holdings, Inc., et al.*, No. 14-cv-00755-AWT (D. Conn.), Matt persuaded the court, after an initial dismissal, to uphold a second amended complaint that pled five separate threads of fraud over a multi-year period by an education funding company and its executives. Among other rulings, court agreed that the company's reported financial and operating results violated Regulation S-K, Item 303, 17 C.F.R. §229.303, for failure to disclose known trends regarding the underlying misconduct and its impacts on reported results – a rare ruling in the absence of any accounting restatement. He negotiated a $7.5 million class-wide settlement that was approved by the court.

As the Firm's lead litigator in *In re KaloBios Pharmaceuticals, Inc. Securities Litigation*, No. 15-cv-05841 (N.D. Cal.), Matt negotiated two court-approved class-wide settlements worth over $3.25 million in the aggregate, from a bankrupt pharmaceutical company, its jailed former CEO, and two separate D&O insurers. Significantly, he secured payments of cash and stock directly from the bankrupt company, which also required bankruptcy court approval.

As the Firm's lead litigator in *In re Silvercorp Metals, Inc. Securities Litigation*, No. 1:12-cv-09456 (S.D.N.Y.), Matt worked closely with mining, accounting, damages, and market efficiency experts to defeat a motion to dismiss and oversee discovery in a securities class action involving a Canadian company with mining operations in China and stock traded on the NYSE. After two mediations, the case was resolved for a $14 million all-cash fund. In granting final approval of the settlement, Judge Rakoff noted that the case was "unusually complex," given the technical nature of mining metrics, the need to compare mining standards in Canada, China, and the U.S., and the volume of Chinese-language evidence requiring translation.

Matt's prior casework also includes litigation and resolution of complex disputes over roll ups of consulting companies and of commercial real estate interests. At Pomerantz, he was on the multi-firm team that litigated and settled *In re Empire State Realty Trust, Inc. Investor Litig*., No. 650607/2012 (N.Y. Sup. Ct.), representing investors in public and private commercial real estate interests against the long-term lessees/operators, the Malkin family and the Estate of Leona Helmsley, regarding a proposed consolidation, REIT formation, and IPO centered around New York's iconic Empire State Building. These efforts achieved broad relief for the class, including a $55 million cash/securities settlement fund, a restructured deal creating a $100 million tax benefit, expansive remedial disclosures, and important deal

protections.

Before joining Pomerantz, Matt began his career at a large full-service Boston firm, litigating primarily for corporate clients. He also worked at plaintiff-side firms in Boston and Connecticut, litigating securities, consumer, and wage and hour class actions, as well as complex sale of business disputes. He has negotiated numerous multi-million-dollar settlements, through both mediation and direct negotiation. His pro bono work includes securing Social Security benefits for a veteran suffering from non-service-related disabilities.

In 2018, Matt was recognized by *Lawyer Monthly* as its Lawyer of the Year (U.S.A.) in the Federal Tort & Military category, based on a ten-point assessment including significance of legal matters, case value, legal expertise, innovation in client care, activity level, and peer recognition. Also in 2018, he was a New York honoree in both the National Trial Lawyers' Class Action Trial Lawyers Association Top 25 and in America's Top 100 High Stakes Litigators® for New York. He was honored as a 2018, 2017, and 2016 Super Lawyers® "Top-Rated Securities Litigation Attorney," a recognition bestowed on 5% of eligible attorneys in the New York Metro area, after a rigorous process overseen by Thompson Reuters. Since 2016, he has been a recommended securities litigator by The Legal 500, which evaluates law firms worldwide for cutting edge, innovative work based on client feedback, practitioner interviews, and independent research. Since 2014, he has maintained Martindale-Hubbell's highest-available AV® Preeminent™ peer rating, scoring 5.0 out of 5.0 in Securities Law, Securities Class Actions, and Securities Litigation while being described as a "First class, top flight lawyer, especially in complex litigation."

Matt graduated from the Georgetown University Law Center in 1999, where he made the Dean's List. He graduated from Wesleyan University in 1995, and among his various volunteer activities, he currently serves as President of the Wesleyan Lawyers Association.

Matt is a member of the Bars of the Supreme Court of the United States; the State of New York; the State of Connecticut; the Commonwealth of Massachusetts; the Second and Ninth Circuit Courts of Appeals; and the United States District Courts for the Southern and Eastern District of New York, Connecticut, Massachusetts, the Northern District of Illinois, and the Southern District of Texas. He is regularly admitted to practice *pro hac vice* in state and federal courts nationwide.

Murielle Steven Walsh

Murielle Steven Walsh joined the Firm in 1998 and was elevated to Partner in 2007. She was recently recognized as a 2018 Lawyer of Distinction, an honor bestowed upon less than 10% of attorneys in any given state.

During her career at Pomerantz, Murielle has prosecuted highly successful securities class action and corporate governance cases. She was one of the lead attorneys litigating *In re Livent Noteholders' Securities Litigation*, a securities class action in which she obtained a $36 million judgment against the company's top officers, a ruling which was upheld by the Second Circuit on appeal. Murielle was also part of the team litigating *EBC I v. Goldman Sachs*, where the Firm obtained a landmark ruling from the New York Court of Appeals, that underwriters may owe fiduciary duties to their issuer clients in the context of a firm-commitment underwriting of an initial public offering.

Murielle currently leads the high-profile securities class action against Wynn Resorts Ltd., in which Pomerantz is lead counsel. The litigation arises from the company's concealment of a long-running pattern of sexual misconduct against Wynn employees by billionaire casino mogul Stephen Wynn, the company's founder and former Chief Executive Officer. *Ferris v. Wynn Resorts Ltd*., No. 18-cv-479 (D. Nev.). She also leads the Firm's ground-breaking litigation arising from the popular Pokémon Go game, in which Pomerantz is lead counsel. Pokémon Go is an "augmented reality" game in which players use their smart phones to "catch" Pokémon in real-world surroundings. GPS coordinates provided by defendants to gamers included directing the public to private property without the owners' permission, amounting to an alleged mass nuisance. *In re Pokémon Go Nuisance*, No. 3:16-cv-04300 (N.D. Cal.)

Murielle is co-lead counsel in *Thorpe v. Walter Investment Management Corp.*, No. 14-cv-20880 (S.D. Fla.), a securities fraud class action challenging the defendants' representations that their lending activities were regulatory-compliant, when in fact the company's key subsidiary engaged in rampant violations of federal consumer financial protection laws, subjecting it to various government investigations and a pending enforcement action by the CFPB and FTC. In 2016, the Firm obtained a $24 million settlement on behalf of the class. She is also co-lead counsel in *Robb v. Fitbit Inc.*, No. 16-cv-00151 (N.D. Cal.), a securities class action alleging that the defendants misrepresented that their key product delivered "highly accurate" heart rate readings when in fact their technology did not consistently deliver accurate readings during exercise and its inaccuracy posed serious health risks to users of Fitbit's products. The Firm obtained a $33 million settlement on behalf of the investor class in this action.

In 2018 Murielle, along with then-Senior Partner Jeremy Lieberman, achieved a $3,300,000 settlement for the Class in the Firm's case against Corinthian Colleges, one of the largest for-profit college systems in the country, for alleged misrepresentations about its job placement rates, compliance with applicable regulations, and enrollment statistics. Pomerantz prevailed in the motion to dismiss the proceedings, a particularly noteworthy victory because Chief Judge George King of the Central District of California had dismissed two prior lawsuits against Corinthian with similar allegations. *Erickson v. Corinthian Colleges, Inc.*, No. 2:13-cv-07466 (C.D. Cal.).

Murielle serves as a member and on the Executive Committee of the Board of Trustees of the non-profit organization Court Appointed Special Advocates for Children ("CASA") of Monmouth County. She also serves on the Honorary Steering Committee of Equal Rights Advocates ("ERA"), which focuses on and discusses specific issues that women face in the legal profession. ERA is an organization that protects and expands economic and educational access and opportunities for women and girls. In the past, Murielle served as a member of the editorial board for Class Action Reports, a Solicitor for the Legal Aid Associates Campaign, and has been involved in political asylum work with the Association of the Bar of the City of New York.

Murielle serves on the Firm's Anti-Harassment and Discrimination Committee.

Murielle graduated *cum laude* from New York Law School in 1996, where she was the recipient of the Irving Mariash Scholarship. During law school, Murielle interned with the Kings County District Attorney and worked within the mergers and acquisitions group of Sullivan & Cromwell.

Murielle is admitted to practice in New York, the United States District Court for the Southern District of New York, the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Sixth Circuit.

Tamar A. Weinrib

Tamar A. Weinrib joined Pomerantz in early 2008. She was Of Counsel to the Firm from 2014 through 2018 and was elevated to Partner in 2019. Tamar was named a 2018 Rising Star under 40 years of age by Law360, a prestigious honor awarded to a select few "top litigators and dealmakers practicing at a level usually seen from veteran attorneys." Tamar has been recognized by Super Lawyers® as a New York Metro Rising Star every year from 2014 through 2018.

In January 2019, Tamar and Managing Partner Jeremy Lieberman achieved a $27 million settlement for the Class, pending court approval, in *Strougo v. Barclays PLC*, a high-profile securities class action in which Pomerantz is Lead Counsel. Plaintiffs allege that Barclays PLC misled institutional investor clients about the extent of the banking giant's use of so-called "dark pool" trading systems. This case turns on the duty of integrity owed by Barclays to its clients. In November 2016, Tamar and Jeremy achieved precedent-setting victories for investors, when the Second Circuit Court of Appeals held that direct evidence of price impact is not always necessary to demonstrate market efficiency to invoke the presumption of reliance, and that defendants seeking to rebut the presumption of reliance must do so by a preponderance of the evidence rather than merely meeting a burden of production. In 2018, Tamar successfully opposed Defendants' petition to the Supreme Court for a writ of certiorari.

Tamar was the attorney responsible for the litigation of *In re Delcath Systems, Inc. Securities Litigation*, in which Pomerantz recently achieved a settlement of $8,500,000 for the Class. She successfully argued before the Second Circuit in *In re China North East Petroleum Securities Litigation,* to reverse the district court's dismissal of the defendants on scienter grounds. In addition to her involvement in several other securities matters pending nationwide, Tamar is the Pomerantz attorney responsible for the litigation of *KB Partners I, L.P. v. Pain Therapeutics, Inc.*, a securities fraud case for which Judge Sparks of the Western District of Texas recently granted final approval for a settlement of up to $8,500,000 for class members.

Before coming to Pomerantz, Tamar had over three years of experience as a litigation associate in the New York office of Clifford Chance US LLP, where she focused on complex commercial litigation. Tamar has successfully tried pro bono cases, including two criminal appeals and a housing dispute filed with the Human Rights Commission.

Tamar graduated from Fordham University School of Law in 2004 and, while there, won awards for successfully competing in and coaching Moot Court competitions.

Tamar is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second, Third, Fourth, and Ninth Circuits.

Michael J. Wernke

Michael J. Wernke joined Pomerantz as Of Counsel in 2014 and was elevated to Partner in 2015.

Michael is Co-Lead Counsel in *Pirnik v. Fiat Chrysler Automobiles N.V. et al.*, No. 1:15-cv-07199-JMF (S.D.N.Y), a high profile securities class action that alleges Fiat Chrysler concealed from investors that it improperly outfitted its diesel vehicles with "defeat device" software designed to cheat NOx emissions regulations in the U.S. and Europe, and that regulators had accused Fiat Chrysler of violating the emissions regulations.

In December 2018, Michael, along with Pomerantz Managing Partner Jeremy A. Lieberman, secured a $31 million partial settlement with three defendants in *In re Libor Based Financial Instruments Antitrust Litigation*, a closely-watched multi-district litigation, which concerns the LIBOR rigging scandal.

In October 2018, Michael secured a $15 million settlement in *In re Symbol Technologies, Inc. Securities Litigation*, No. 2:05-cv-03923-DRH-AKT (E.D.N.Y.), a securities class action that alleges that, following an accounting fraud by prior management, Symbol's management misled investors about state of its internal controls and the Company's ability to forecast revenues.

He was Lead Counsel in *Thomas v. Magnachip Semiconductor Corp.*, in which he achieved a $23.5 million partial settlement with certain defendants, securing the settlement despite an ongoing investigation by the Securities and Exchange Commission and shareholder derivative actions. He played a leading role in *In re Lumber Liquidators, Inc. Securities Litigation*, in which Pomerantz, as Co-Lead Counsel, achieved a settlement of $26 million in cash and 1,000,000 shares of Lumber Liquidators common stock for the Class. Michael also secured a $7 million settlement (over 30% of the likely recoverable damages) in the securities class action *Todd v. STAAR Surgical Company, et. al.*, No. 14-cv-05263-MWF-RZ (C.D. Cal.), which alleged that STAAR concealed from investors violations of FDA regulations that threatened the approval of STAAR's long awaited new product.

In the securities class action *In re Atossa Genetics, Inc. Securities Litigation*, No. 13-cv-01836-RSM (W.D. Wash.), Michael secured a decision by the Ninth Circuit Court of Appeals that reversed the district court's dismissal of the complaint. The Ninth Circuit held that the CEO's public statements that the company's flagship product had been approved by the FDA were misleading despite the fact that the company's previously-filed registration statement stated that that the product did not, at that time, require FDA approval.

Michael is also Lead Counsel in the securities class action *Zwick Partners, LP v. Quorum Health Corp., et al.*, No. 3:16-cv-2475, which alleges that defendants misrepresented to investors the poor prospects of hospitals that the parent company spun-off into a stand-alone company. In defeating the defendants' motions to dismiss the complaint, Michael successfully argued that company from which Quorum was spun-off was a "maker" of the false statements even though

all the alleged false statements concerned only Quorum's financials and the class involved only purchasers of Quorum's common stock.

During the nine years prior to coming to Pomerantz, Michael was a litigator with Cahill Gordon & Reindel LLP, with his primary focus in the securities defense arena, where he represented multinational financial institutions and corporations, playing key roles in two of only a handful of securities class actions to go to jury verdict since the passage of the PSLRA.

In 2014 and 2015, Michael was voted by his peers as a Super Lawyers® New York Metro Rising Star.

Michael received his J.D. from Harvard Law School in 2004. He also holds a B.S. in Mathematics and a B.A. in Political Science from Ohio State University, where he graduated *summa cum laude*.

He serves on the Firm's Anti-Harassment and Discrimination Committee.

Michael is admitted to practice in the State of New York and the United States District Court for the Southern District of New York.

Senior Counsel

Marc I. Gross

Marc I. Gross has been with Pomerantz LLP for over four decades, serving as its Managing Partner from 2009 to 2016. During that time frame, Marc led securities lawsuits against SAC Capital (Steven Cohen - insider trading); Chesapeake Energy (Aubrey McClendon - insider bail out); Citibank (analyst Jack Grubman - AT&T research report upgrade to facilitate underwriting role); Charter Communications (Paul Allen - accounting fraud); and numerous others. He also litigated the market efficiency issues in the firm's landmark $3 billion recovery in *Petrobras*.

Marc is the President-Elect of the Institute of Law and Economic Policy ("ILEP"), which has organized symposiums each year where leading academics have presented papers on securities law and consumer protection issues. These papers have been cited in over 60 cases, including several in the United States Supreme Court. http://www.ilep.info.

Marc has addressed numerous forums in the United States on shareholder-related issues, including ILEP; Loyola University Chicago School of Law's Institute for Investor Protection Conference; the National Conference on Public Employee Retirement Systems' ("NCPERS") Legislative Conferences; PLI conferences on Current Trends in Securities Law; and a panel entitled *Enhancing Consistency and Predictability in Applying Fraud-on-the-Market Theory*, sponsored by the Duke Law School Center for Judicial Studies.

Marc is also valued by foreign investors for his expertise, having addressed the Tel Aviv Institutional Investors Forum, the National Association of Pension Funds Conference in Edinburgh, and law students at Bar Ilan University in Tel Aviv.

Among other articles, Marc co-authored, with Jeremy Lieberman, *Back to Basic(s): Common Sense Trumps Econometrics*, N.Y.L.J. (Jan. 8, 2018); *Class Certification in a Post-Halliburton II World*, 46 Loyola-Chicago L.J. 485 (2015); and *Loser-Pays - or Whose "Fault" Is It Anyway: A Response to Hensler-Rowe's "Beyond 'It Just Ain't Worth It,'"* 64 L. & Contemp. Probs. 163 (Duke Law School 2001).

Marc is also a Board member of T'ruah, The Rabbinic Call for Human Rights, and graduate of NYU Law '76 and Columbia College '73.

Marc is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, the United States Courts of Appeals for the First, Second, Eighth, and Ninth Circuits, and the United States Supreme Court.

Marc serves on the Firm's Anti-Harassment and Discrimination Committee.

Stanley M. Grossman

Stanley M. Grossman, Senior Counsel, is the former Managing Partner of Pomerantz. He is recognized as a leader in the plaintiffs' securities bar. He was selected by *Super Lawyers* magazine as an outstanding attorney in the United States for the years 2006 through 2011 and was featured in the *New York Journa*l article *Top Litigators in Securities Field -- A Who's Who of City's Leading Courtroom Combatants*. Stan has litigated securities (individual and class), derivative, and antitrust actions with the Firm for 39 years.

Stan has primarily represented plaintiffs in securities and antitrust class actions, including many of those listed in the Firm biography. *See, e.g., Ross v. Bernhard*, 396 U.S. 531 (1970); *Rosenfeld v. Black*, 445 F.2d 137 (2d Cir. 1971); *Wool v. Tandem Computers, Inc.*, 818 F.2d 1433 (9th Cir. 1987); and *In re Salomon Bros. Treasury Litig.*, 9 F.3d 230 (2d Cir. 1993). In 2008 he appeared before the United States Supreme Court to argue that scheme liability is actionable under Section 10(b) and Rule 10b-5(a) and (c). *See StoneRidge Inv. Partners, LLC v. Sci.-Atlanta*, *Inc.,* No. 06-43 (2008). Other cases where he was the Lead or Co-Lead Counsel include: *In re Salomon Brothers Treasury Litigation*, No. 91 Civ. 5471 (S.D.N.Y. 1994) ($100 million cash recovery); *In re First Executive Corporation Securities Litigation*, No. CV-89-7135 (C.D. Cal. 1994) ($100 million settlement); and *In re Sorbates Direct Purchaser Antitrust Litigation*, No. C98-4886 (N.D. Cal. 2000) (over $80 million settlement for the class).

In 1992, Senior Judge Milton Pollack of the Southern District of New York appointed Stan to the Executive Committee of counsel charged with allocating to claimants hundreds of millions of dollars obtained in settlements with Drexel Burnham & Co. and Michael Milken.

Many courts have acknowledged the high quality of legal representation provided to investors by Stan. In *Gartenberg v. Merrill Lynch Asset Management, Inc.*, No. 79 Civ. 3123 (S.D.N.Y.), where Stan was lead trial counsel for plaintiff, Judge Pollack noted at the completion of the trial:

> [I] can fairly say, having remained abreast of the law on the factual and legal matters that have been presented, that I know of no case that has been better presented so as to give the Court an opportunity to reach a determination, for which the court thanks you.

Stan was also the lead trial attorney in *Rauch v. Bilzerian* (N.J. Super. Ct.) (directors owed the same duty of loyalty to preferred shareholders as common shareholders in a corporate takeover), where the court described the Pomerantz team as "exceptionally competent counsel." He headed the six week trial on liability in *Walsh v. Northrop Grumman* (E.D.N.Y.) (a securities and ERISA class action arising from Northrop's takeover of Grumman), after which a substantial settlement was reached.

Stan frequently speaks at law schools and professional organizations. In 2010, he was a panelist on *Securities Law: Primary Liability for Secondary Actors*, sponsored by the Federal Bar Council, and he presented *Silence Is Golden – Until It Is Deadly: The Fiduciary's Duty to Disclose*, at the Institute of American and Talmudic Law. In 2009, Stan was a panelist on a Practicing Law Institute "Hot Topic Briefing" entitled StoneRidge - *Is There Scheme Liability or Not?*

Stan served on former New York State Comptroller Carl McCall's Advisory Committee for the NYSE Task Force on corporate governance. He is a former president of NASCAT. During his tenure at NASCAT, he represented the organization in meetings with the Chairman of the Securities and Exchange Commission and before members of Congress and of the Executive Branch concerning legislation that became the PSLRA.

Stan served for three years on the New York City Bar Association's Committee on Ethics, as well as on the Association's Judiciary Committee. He is actively involved in civic affairs. He headed a task force on behalf of the Association, which, after a wide-ranging investigation, made recommendations for the future of the City University of New York. He serves on the board of the Appleseed Foundation, a national public advocacy group.

Stan is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, Central District of California, Eastern District of Wisconsin, District of Arizona, District of Colorado, the United States Courts of Appeals for the First, Second, Third, Ninth and Eleventh Circuits, and the United States Supreme Court.

Of Counsel

Michele S. Carino

Michele S. Carino joined Pomerantz as Of Counsel in 2014. An experienced litigator and professional legal writer, Michele's practice focuses on securities fraud, corporate governance, mergers and acquisitions, and complex commercial cases.

Before joining Pomerantz, Michele honed her skills as a securities and corporate governance attorney at Stroock and at Grant & Eisenhofer, serving clients on both the defense and plaintiff side of class actions, shareholder derivative actions, and other investor protection cases.

Michele received her Bachelor of Arts in Economics from Binghamton University with Phi Beta Kappa honors in 1992 and graduated *magna cum laude* from Georgetown University Law Center in 1999. She has taught a legal research and writing seminar at Columbia University Law School and has served as a Mentor and Coach to Legal Outreach, a constitutional law and college preparatory program for New York City public high school students.

Michele is admitted to practice law before the Supreme Court of the United States and the United States District Courts for the Southern District of New York and the District of Delaware and is a member of the bar of the states of New York and Delaware.

J. Alexander Hood II

J. Alexander Hood II joined Pomerantz in June 2015 and was elevated to Of Counsel to the Firm in 2019. Alex leads the Firm's case origination team, identifying and investigating potential violations of the federal securities laws. Alex played a key role in securing Pomerantz's appointment as Lead Counsel in actions against Yahoo! Inc., Fiat Chrysler Automobiles N.V., Wynn Resorts Limited, Mylan N.V., The Western Union Company, Perrigo Company plc, and Blue Apron Holdings, Inc., among others.

Alex also assists Pomerantz clients with respect to evaluating and pursuing recovery in foreign jurisdictions, including matters in the Netherlands, Germany, the UK, Australia, Denmark, and elsewhere.

Prior to joining Pomerantz, Alex was a litigation associate at Alston & Bird LLP and an attorney at Bernstein Litowitz Berger & Grossmann LLP, where he was involved in commercial, financial services, corporate governance and securities matters.

Alex graduated from Boston University School of Law (J.D.) and from the University of Oregon School of Law (LL.M.). During law school, he served as a member of the Boston University Review of Banking & Financial Law and participated in the Thomas Tang Moot Court Competition. In addition, Alex clerked for the American Civil Liberties Union of Tennessee and, as a legal extern, worked on the Center for Biological Diversity's Clean Water Act suit against BP in connection with the Deepwater Horizon oil spill.

Alex is admitted to practice in New York and the United States District Courts for the Southern and Eastern Districts of New York, the District of Colorado, the Eastern District of Michigan, and the Northern District of Illinois.

Louis C. Ludwig

Louis C. Ludwig joined Pomerantz in April 2012 and was elevated to Of Counsel in 2019. He has been honored as a 2016 and 2017 Super Lawyers® "Rising Star" and as a 2018 Super Lawyers® "Top-Rated Securities Litigation Attorney."

Louis focuses his practice on securities fraud litigation, and has served as a member of the litigation team in multiple actions that concluded in successful settlements for the Class, including *Satterfield v. Lime Energy Co.*, (N.D. Ill.); *Blitz v. AgFeed Industries*, *Inc.* (M.D. Tenn.); *Frater v. Hemispherx Biopharma, Inc.* (E.D. Pa.); *Bruce v. Suntech Power Holdings Co.* (N.D. Cal.); *In re: Groupon, Inc. Securities Litigation*

(N.D. Ill.); *Flynn v. Sientra, Inc.* (C.D. Cal.); *Thomas v. MagnaChip Semiconductor Corp.* (N.D. Cal.); *In re: AVEO Pharmaceuticals, Inc. Securities Litigation* (N.D. Cal.); and *In re: Akorn, Inc. Securities Litigation* (N.D. Ill.).

Louis graduated from Rutgers University School of Law in 2007, where he was a Dean's Law Scholarship Recipient. He served as a law clerk to the Honorable Arthur Bergman, Superior Court of New Jersey. Prior to joining Pomerantz, Louis specialized in litigating consumer protection class actions at Bock & Hatch LLC in Chicago, Illinois.

Louis is admitted to practice in New Jersey, Illinois, the United States Courts of Appeal for the Seventh and Ninth Circuits, and the United States District Courts for the District of New Jersey and the Northern District of Illinois.

Justin S. Nematzadeh

Justin Solomon Nematzadeh joined Pomerantz in June 2015 and was elevated to Of Counsel in 2019. Justin focuses his practice on securities fraud litigation. He was honored in 2018 as a Rising Star under 40 years of age by Law360® in Class Actions, a prestigious award given to a select few "top litigators and dealmakers practicing at a level usually seen from veteran attorneys." He was also honored in 2018 by Super Lawyers® as a Rising Star in New York and by Lawyers of Distinction®.

Justin played a key role in the securities class action against Brazil's largest oil company, Petróleo Brasileiro S.A. – Petrobras, arising from a multi-billion-dollar kickback and bribery scheme, in which Pomerantz LLP, as sole Lead Counsel, recently achieved a historic $3 billion settlement for the class, as well as precedent-setting legal rulings.

Justin's robust experience in representing both plaintiffs and defendants in antitrust and securities-fraud litigation, including first-chair trial experience, has forged him into a formidable advocate on behalf of plaintiffs in class actions. In addition to his role in the *In re Petrobras Securities Litigation* (S.D.N.Y.), Justin played pivotal roles in several class actions that resulted in total recoveries amounting to over $270 million for plaintiffs: *In re Altair Nanotechnologies Securities Litigation* (S.D.N.Y.), recovery of $1.5 million; *Carmack v. Amaya Inc., et al.* (D.N.J.), recovery of $5.75 million; *Calfo v. Messina, et al.* (S.D.N.Y.), recovery of $1.65 million; *Kaplan v. S.A.C. Capital Advisors, L.P., et al.* (S.D.N.Y.), recovery of $135 million; *Mauss v. NuVasive, Inc., et al.* (S.D. Cal.), recovery of $7.9 million; *In re OSG Securities Litigation* (S.D.N.Y.), recovery of over $30 million; *Perez v. Higher One Holdings, Inc., et al.* (D. Conn.), recovery of $7.5 million; *In re Retrophin, Inc. Securities Litigation* (S.D.N.Y.), recovery of $3 million; *Springer v. Code Rebel Corporation* (S.D.N.Y.), recovery of $1 million; and *In re Yahoo! Inc. Securities Litigation* (N.D. Cal.), recovery of $80 million. Justin played integral roles in representing plaintiffs in the *In re Generic Digoxin and Doxycycline Antitrust Litigation* (E.D. Pa.) and *In re Treasury Securities Auction Antitrust Litigation* (S.D.N.Y.).

Prior to joining Pomerantz in 2015, Justin practiced at Gibson, Dunn & Crutcher LLP. His practice involved federal and state complex litigation and internal and regulatory investigations, with a focus on antitrust and securities-fraud litigation. He played integral roles in representing defendants in *Alaska Electrical Pension Fund v. Bank of America, N.A., et al* (S.D.N.Y.), *Garofalo v. Revlon, Inc., et al.* (D. Del.), *In re Foreign Exchange Benchmark Rates Antitrust Litigation* (S.D.N.Y.), and *In re LIBOR-Based Financial*

Instruments Antitrust Litigation (S.D.N.Y.). For his work in representing plaintiffs in *Toney-Dick v. Doar*, he was awarded a 2013 Pro Bono Publico award from The Legal Aid Society.

An avid writer, Justin is the co-author of the Delaware Business Court Insider article entitled *Lead Plaintiffs' Shareholdings Draw Chancery Review*. He contributed to chapters in the American Bar Association's *Antitrust Law Developments*, Matthew Bender's *Antitrust Laws and Trade Regulation*, the *ABA Antitrust Civil Jury Instructions Handbook*, and Professor Deborah W. Denno's chapter entitled *When Willie Francis Died: The "Disturbing" Story Behind One of the Eighth Amendment's Most Enduring Standards of Risk*, in John H. Blume and Jordan M. Steiker's book, *Death Penalty Stories*.

Justin earned his J.D. degree, *cum laude*, from the Fordham University School of Law. During law school, he served as a member of the Fordham Urban Law Journal and as a business editor of the Fordham Dispute Resolution Society. Additionally, he served as a judicial intern to the Honorable Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York. He earned his B.B.A. degree, *with distinction*, from the University of Michigan Stephen M. Ross School of Business, with an emphasis in finance and corporate strategy. During business school, he was awarded a University of Michigan Alumnae Council MBNA Scholarship.

Justin is admitted to practice law in New York and the United States District Courts for the Southern and Eastern Districts of New York and Eastern District of Michigan. He is a member of the American Bar Association and the New York City and State Bar Associations.

H. Adam Prussin

Adam Prussin specializes in securities litigation and has extensive experience in derivative actions. He was special litigation counsel in the derivative actions on behalf of Summit Metals, Inc., actions which resulted in entry of a judgment, after trial, of $43 million in cash, plus an order transferring the stock of two multi-million-dollar companies to the plaintiff.

Adam has published several articles on the subject of the standards and procedures for the maintenance or dismissal of derivative actions, including *Termination of Derivative Suits Against Directors on Business Judgment Grounds: From* Zapata *to* Aronson, 39 Bus. Law. 1503 (1984); *Dismissal of Derivative Actions Under the Business Judgment Rule:* Zapata *One Year Later*, 38 Bus. Law. 401 (1983); and *The Business Judgment Rule and Shareholder Derivative Actions: Viva* Zapata*?* 37 Bus. Law. 27 (1981). In June 2009 he spoke at the 6th Annual Securities Litigation Conference in New York, participating in the panel discussion, *From Behind Enemy Lines: The Perspective of Two Prominent Plaintiff Attorneys*.

Before joining the Firm, Adam was a named partner in Silverman, Harnes, Harnes, Prussin & Keller, which specializes in representing plaintiffs in shareholder derivative and class action litigation, particularly those involving self-dealing by corporate officers, directors and controlling shareholders. He played a key role in several landmark derivative cases in the Delaware courts, and has appeared frequently before the Delaware Supreme Court.

Adam graduated *cum laude* from Yale College in 1969 and, after obtaining a master's degree from the University of Michigan in 1971, received his J.D. degree from Harvard Law School in 1974.

Adam is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second, Ninth and D.C. Circuits.

Brenda Szydlo

Brenda Szydlo joined Pomerantz in January 2016 as Of Counsel. She brings to the Firm thirty years of experience in complex civil litigation in federal and state court on behalf of plaintiffs and defendants, with a particular focus on securities and financial fraud litigation, litigation against pharmaceutical corporations, accountants' liability, and commercial litigation.

Brenda played a leading role in the Firm's securities class action case in the Southern District of New York against Brazil's largest oil company, Petrobras, arising from a multi-billion-dollar kickback and bribery scheme, in which the Firm, as sole Lead Counsel, achieved a precedent-setting legal ruling and a historic $3 billion settlement for the Class. This is not only the largest securities class action settlement in a decade but is the largest settlement ever in a securities class action involving a foreign issuer, the fifth-largest securities class action settlement ever achieved in the United States, the largest securities class action settlement achieved by a foreign Lead Plaintiff, and the largest securities class action settlement in history not involving a restatement of financial reports.

Brenda has represented investors in additional class and private actions that have resulted in significant recoveries, such as *In re Pfizer, Inc. Securities Litigation*, where the recovery was $486 million, and *In re Refco, Inc. Securities Litigation*, where the recovery was in excess of $407 million. She has also represented investors in opt-out securities actions, such as *In re Bank of America Corp. Securities, Derivative & ERISA Litigation*.

Prior to joining Pomerantz, Brenda served as Senior Counsel at Grant & Eisenhofer P.A., where she represented plaintiffs in securities and financial fraud litigation, and litigation against pharmaceutical corporations and accounting firms. Brenda also served as Counsel in the litigation department of Sidley Austin LLP in New York, and its predecessor, Brown & Wood LLP, where her practice focused on securities litigation and enforcement, accountants' liability defense, and commercial litigation.

Brenda is a 1988 graduate of St. John's University School of Law, where she was a St. Thomas More Scholar and member of the Law Review. She received a B.A. in economics from Binghamton University in 1985.

Brenda is admitted to practice in the State of New York; United States District Courts for the Southern and Eastern Districts of New York; the U.S. Courts of Appeals for the Second and Ninth Circuits; and the United States Supreme Court.

Nicolas Tatin

French lawyer Nicolas Tatin joined Pomerantz in April 2017 as Of Counsel. He heads the Firm's Paris office and serves as its Director-Business Development Consultant for France, Benelux, Monaco and Switzerland. Nicolas advises institutional investors in the European Union on how best to evaluate losses to their investment portfolios attributable to financial misconduct, and how best to maximize their potential recoveries in U.S. and international securities litigations.

Nicolas was previously a financial lawyer at ERAFP, France's €24bn pension and retirement fund for civil servants, where he provided legal advice on the selection of management companies and the implementation of mandates entrusted to them by ERAFP.

Nicolas began his career at Natixis Asset Management, before joining BNP Paribas Investment Partners, where he developed expertise in the legal structuring of investment funds and acquired a global and cross-functional approach to the asset management industry.

Nicolas graduated in International law and received an MBA from IAE Paris, the Sorbonne Graduate Business School.

Austin P. Van

Austin P. Van joined Pomerantz in January 2017 as Of Counsel. He brings to the Firm experience in a variety of federal and state securities law matters, including disputes involving publicly traded stocks, RMBS and other ABS, securities lending disputes, and breach-of-trust matters arising in the securities law context. Austin was honored in 2018 as a Super Lawyers® Rising Star.

Austin also has experience in complex commercial litigation, including contract disputes, business torts, consumer fraud, and antitrust matters. He has represented investment banks and other financial sector clients, as well as public and private companies in the technology, energy, pharmaceutical, telecommunications and shipping industries, among others. Austin was previously an associate at WilmerHale and at Cravath, Swaine & Moore, both in New York City.

Austin received a J.D. from Yale Law School, where he was an editor of the Yale Law Journal and the Yale Journal of International Law. He has a B.A. from Yale University and an M.Sc. from the London School of Economics.

Austin is admitted to practice law in the State of New York and in the United States District Courts for the Southern and Eastern Districts of New York.

Associates

Samuel J. Adams

Samuel J. Adams focuses on corporate governance litigation.

Mr. Adams was previously an associate at Robbins Geller Rudman & Dowd LLP, where he focused his practice on securities fraud litigation and other complex matters. He has been recognized as a SuperLawyers® "Rising Star" for the New York Metro area for every year from 2015 through 2018.

Sam is a 2009 graduate of the University of Louisville Louis D. Brandeis School of Law. While in law school, he was a member of the National Health Law Moot Court Team. He also participated in the Louis D. Brandeis American Inn of Court.

Sam is admitted to practice in New York, the United States District Courts for the Southern, Northern, and Eastern Districts of New York, and the United States District Court for the Eastern District of Wisconsin.

Jessica N. Dell

Jessica Dell focuses her practice on securities fraud litigation.

She has worked on dozens of cases at Pomerantz, including the Firm's securities fraud lawsuits arising from BP's 2010 Gulf oil spill, pending in Multidistrict Litigation. Jessica has expertise in managing discovery and a nose for investigating complex fraud across many sectors, including pharmaceuticals, medical devices, and data security. True to her roots in public interest law, she has also worked in complex pro bono class action litigation at Pomerantz.

Jessica graduated from CUNY School of Law in 2005. She was the recipient of an Everett fellowship for her work at Human Rights Watch. She also interned at the Urban Justice Center and National Advocates for Pregnant Women. While in the CUNY clinical program, she represented survivors of domestic violence facing deportation and successfully petitioned under the Violence Against Women Act. She also successfully petitioned for the release of survivors incarcerated as drug mules in Central America. After Hurricane Katrina, Jessica traveled to Louisiana to aid emergency efforts to reunite families and restore legal process for persons lost in the prison system weeks after the flood.

Jessica is a member of the New York City and State Bar Associations and the National Lawyers Guild.

Andrea Farah

Andrea Farah focuses her practice on corporate governance and securities fraud litigation.

Prior to joining Pomerantz in 2018, Andrea worked as a litigation associate at a boutique class action law firm, where she represented institutional and individual clients in federal and state courts throughout the United States, and the Financial Industry Regulatory Authority in a variety of matters, including securities, consumer, antitrust, and other complex commercial litigation. Andrea's experience includes litigation of prominent cases, several of which achieved notable victories.

Andrea is a graduate of the Quinnipiac University School of Law (J.D., *cum laude,* 2013) and the School of Business (M.B.A, 2013). She graduated *summa cum laude* from the University of North Florida with a Bachelor of Arts in Psychology in 2009.

Andrea is licensed to practice in the States of New York and Connecticut and is admitted to practice in the United States District Courts for the Districts of Southern New York and Eastern Wisconsin.

Andrea is bilingual and maintains a personal *pro bono* practice, representing refugees and asylees.

Marc C. Gorrie

Marc C. Gorrie joined Pomerantz in 2014. He focuses his practice on securities fraud litigation and is actively involved in the Firm's securities lawsuit concerning Petróleo Brasileiro S.A.- Petrobras. As a member of the Firm's new matter group, he identifies and investigates potential violations of the federal securities laws.

Prior to joining the Firm, Marc focused his practice on a major securities fraud litigation with a prominent New York law firm. He was actively engaged in legal outreach for the Center for Seafarers' Rights of the Seamen's Church Institute of New York and New Jersey. Marc has previously served as a consultant for an EU development project on the rule of law in Gambia. He has authored articles on international humanitarian and human rights law published by organizations including the Foreign Policy Association and the Revue de Droit Comparé du Travail et de la Sécurité Sociale. Marc currently serves a member of the Ambassadors Advisory Group for One to One International Consulting, an international aid and development consulting firm headquartered in Ghana.

Marc is a 2010 graduate of Indiana University Maurer School of Law - Bloomington (J.D.) where he held a research fellowship in legal ethics and was consistently on the Dean's List. He is a 2012 graduate of University of Lund, Sweden (LLM, in conjunction with the Raoul Wallenberg Institute of Human Rights and Humanitarian Law) where he earned honors marks, lectured on U.S. Legal Ethics and on Federal Indian Law, and delivered his thesis on the interaction of tribal, state, federal, and international human rights and labor laws in the United States. Marc is a 2005 graduate of Sarah Lawrence College with a BA in Liberal Arts.

Marc is admitted to practice in New Jersey and the United States District Court, District of New Jersey.

Aatif Iqbal

Aatif Iqbal focuses his practice on securities fraud litigation.

Before joining Pomerantz, Aatif was a litigation associate at Cleary Gottlieb Steen & Hamilton LLP, where his practice involved bankruptcy, securities, and complex commercial litigation matters. Aatif also served as a law clerk for the Honorable Patricia A. Seitz, United States District Judge for the Southern District of Florida.

Aatif graduated cum laude from Harvard Law School, where he earned a Dean's Scholarship in First Amendment Law and served as Managing Editor of the Harvard International Law Journal and Managing Technical Editor of the Harvard Human Rights Journal. He graduated cum laude from Yale University with a B.A. in Political Science.

Aatif is admitted to practice in New York.

Omar Jafri

Omar Jafri's practice focuses on securities fraud litigation.

Before joining Pomerantz LLP, he was a law clerk to Judge William S. Duffey, Jr. of the United States District Court for the Northern District of Georgia. Omar was also an associate at Jenner & Block LLP's Chicago Office, where he represented clients in a wide variety of matters, including securities litigation, complex commercial litigation, white collar criminal defense and internal investigations.

During the last several years, Omar has litigated major disputes on behalf of institutional investors arising out of the credit crisis, including disputes relating to Collateralized Debt Obligations, Residential Mortgage-Backed Securities, Credit Default Swaps and other complex financial investments. He also has provided pro bono representation to several individuals charged with first-degree murder and attempted murder in the State and Federal courts of Illinois.

Omar graduated, magna cum laude, from the University of Illinois College of Law, where he was a Harno Scholar, and represented the College of Law in the Midwest Moot Court competition, winning second place for best oral advocate in the preliminary round and first place for best oral advocate in the semi-final round. He received his B.A. from the University of Texas at Austin, where he was on the Dean's Honor List and the University Honors List.

Omar is admitted to practice in Illinois, and the United States District Courts for the Northern District of Illinois and the Northern District of Indiana.

Jonathan Lindenfeld

Jonathan Lindenfeld focuses his practice on securities fraud litigation. Prior to joining Pomerantz, Jonathan was an associate at a national plaintiffs' securities litigation firm where he focused on securities fraud litigation and stockholder derivative suits.

Jonathan graduated *cum laude* from Hofstra University School of Law in 2015, where he received Honors in Business Law, was awarded Merit Based Scholarships, and was on the Dean's Honor List. While in law school, Jonathan gained experience in the U.S. Attorney's Office for the Eastern District of New York and a boutique law firm specializing in forex and derivative exchanges. Jonathan also served as an editor of the Hofstra Journal of International Business and Law. Jonathan earned a Bachelor of Arts in Economics from City University of New York-Queens College in 2012.

In 2015, Jonathan published "The CFTC's Substituted Compliance Approach: An Attempt to Bring About Global Harmony and Stability in the Derivatives Market," in the Journal of International Business and Law: Vol. 14: Iss. 1, Article 6.

The article is available at: http://scholarlycommons.law.hofstra.edu/jibl/vol14/iss1/6.

Jonathan is admitted to practice in New York, New Jersey, and the United States District Courts for the Southern District of New York and District of New Jersey.

Veronica V. Montenegro

Veronica V. Montenegro focuses her practice on securities fraud litigation.

Prior to joining Pomerantz, Veronica served for seven years as an Assistant Attorney General in the Investor Protection Bureau in the Office of the New York State Attorney General. Veronica represented the Office in some of its most high-profile financial fraud prosecutions. She worked on a case against a Madoff feeder-fund manager which resulted in the return of millions of dollars to defrauded investors. She was a member of the Residential Mortgage Backed Securities (RMBS) Working Group, comprised of State and Federal prosecutors tasked with investigating and prosecuting mortgage securities fraud, which has resulted in billions of dollars in recoveries. In recognition of her work in the RMBS Working Group, Veronica was awarded the Louis Lefkowitz Award for Exceptional Service. Veronica also worked on cases involving insider trading, auction rate securities and foreign exchange execution.

Veronica graduated from Fordham University School of Law in 2008. During law school, she served as a member of the Fordham International Law Journal and in Fordham's Moot Court Board. Additionally, she served as a judicial extern to the Honorable Ronald L. Ellis, Magistrate Judge for the Southern District of New York. Veronica graduated from New York University's College of Arts and Science in 2004, *cum laude*, with a double major in Political Science and Latin American Studies.

Veronica is admitted to practice in the States of New York and New Jersey and the United States District Court for the Southern District of New York.

Villi Shteyn

Villi Shteyn focuses his practice on securities fraud litigation.

Before joining Pomerantz, Villi was employed by a boutique patent firm, where he worked on patent validity issues in the wake of the landmark *Alice* decision, in which the court ruled that an abstract idea does not become eligible for a patent simply by being implemented on a generic computer. He also helped construct international patent maintenance tools for clients and assisted in pursuing injunctive relief for a patent-holder client against a large tech company.

Villi graduated from The University of Chicago Law School (J.D., 2017). In 2014, he graduated *summa cum laude* from Baruch College with a Bachelor of Science in Public Affairs.

Jennifer Banner Sobers

Jennifer Banner Sobers focuses her practice on securities fraud litigation.

Jennifer played an integral role on the team litigating *In re Petrobras Securities Litigation,* in the Southern District of New York, a securities class action arising from a multi-billion-dollar kickback and bribery scheme involving Brazil's largest oil company, Petróleo Brasileiro S.A. - Petrobras. The Firm, as sole Lead Counsel, recently achieved a historic $3 billion settlement on behalf of investors in Petrobras securities. Among Jennifer' contributions to the team's success were: managing the entire third-party

discovery in the United States, which resulted in the discovery of key documents and witnesses; deposing several underwriter bank witnesses; and drafting portions of Plaintiffs' amended complaints that withstood motions to dismiss the claims and Plaintiffs' successful opposition to Defendants' appeal in the Second Circuit, which resulted in precedential rulings.

Jennifer is a key member of the litigation teams of other nationwide cases, including: *In re BP p.l.c Securities Litigation*, the MDL pending in the Southern District of Texas, which are securities fraud lawsuits on behalf of institutional investors in BP p.l.c. to recover losses in BP's common stock (which trades on the London Stock Exchange), arising from BP's 2010 Gulf oil spill and for which the team has successfully opposed several motions to dismiss the claims; *In re KaloBios Pharmaceuticals Inc. Securities Litigation,* pending in the Northern District of California, which secured successful settlements for the Class; and *Perez v. Higher One Holdings, Inc.,* pending in the District of Connecticut, which survived dismissal and was successfully settled, pending court approval.

Prior to joining Pomerantz, Jennifer was an associate with a prominent law firm in New York where her practice focused on complex commercial litigation, including securities law and accountants' liability. An advocate of pro bono representation, Jennifer earned the Empire State Counsel honorary designation from the New York State Bar Association and received an award from New York Lawyers for the Public Interest for her pro bono work.

Jennifer received her B.A. from Harvard University (with honors), where she was on the Dean's List, a Ron Brown Scholar, and a recipient of the Harvard College Scholarship. She received her J.D. from University of Virginia School of Law where she was a participant in the Lile Moot Court Competition and was recognized for her pro bono service.

She is a member of the Federal Bar Council, New York City Bar Association, and New York State Bar Association. She is also a member of the Association of Arbitrators.

Jennifer is admitted to practice in New York, the United States District Court for the Southern District of New York, and the United States Courts of Appeals for the Second and Ninth Circuits.

Roxanna Talaie

Roxanna Talaie focuses her practice on securities litigation.

As a member of the Firm's investor relations group, she also frequently travels throughout the United States to inform clients on how best to evaluate losses to their investment portfolios attributable to financial fraud or other misconduct.

Roxanna earned a Bachelor of Arts in Political Science from the University of Southern California in Los Angeles, California. She earned her law degree from Pepperdine University School of Law. During her time at Pepperdine, Roxanna participated in Pepperdine's Community Justice Clinic, in which she acted as general counsel for nonprofits, nongovernmental organizations, and other community groups working to promote social justice, human rights and develop economic opportunities and resources for vulnerable, underserved people and communities. She also earned a certificate in Dispute Resolution from Pepperdine's Straus Institute for Dispute Resolution, the highest-ranked dispute resolution program in the United States.

Prior to studying law, Roxanna worked as an auditor and analyst in the mortgage industry at Bank of America.

Roxanna is admitted to practice in the State of California and the United States District Court for the Central District of California. She is based in Los Angeles.

Staff Attorneys

Átila de Carvalho Beatrice Condini

Átila de Carvalho Beatrice Condini, an international attorney at Pomerantz, focuses on class action securities litigation.

Átila brings to Pomerantz his 13 years' expertise in complex Brazilian federal legal, procedural, and regulatory issues. He is a member of Pomerantz's team for three securities class actions against Brazilian companies: *In re Petrobras Sec. Litig*., *Manidhar Kukkadapu, et al. v. Embraer, et al*., and *Banco Safra S.A. - Cayman Islands Branch* v. *Samarco Mineração S.A.* et al.

Átila is a partner (on leave) at the law firm, Condini & Tescari Advogados, in São Paolo, Brazil, where he was responsible for the tax and litigation divisions. Before that, he was an associate and senior associate at two other major Brazilian law firms in São Paolo. During that period, he successfully worked on cases that became benchmarks in the Brazilian legal scenario. In one of them, he prepared a brief in the Extraordinary Appeal nº 559.937, whose thesis was accepted by the Brazilian Supreme Court, reducing the social contribution taxes (PIS / COFINS-Importação) levied on imports. In another case, he defended an advanced interpretation about D&O responsibilities, which was also accepted by the Brazilian Supreme Court in the Extraordinary Appeal nº 562.276.

Átila has also been attentive to social causes, not only practicing pro bono, but also in the human rights field. For example, Átila conducted a legal research project that ultimately resulted in the human rights group, Tortura Nunca Mais, being able to help fund and support the creation of a free virtual library focused on keeping alive Brazilian recent history for future generations. In 2006, Átila received a Bachelor of Laws degree from Pontifical University Catholic of São Paulo ("PUC/SP"). In 2008, he received a specialized law degree in taxation from PUC/SP.

Laura M. Perrone

Laura M. Perrone focuses on class action securities litigation.

Prior to joining Pomerantz, Laura worked on securities class action cases at Labaton Sucharow. Preceding that experience, she represented plaintiffs at her own securities law firm, the Law Offices of Laura M. Perrone, PLLC.

More recently, Laura has represented bondholders against Citigroup for its disastrous investments in residential mortgage backed securities, shareholders against Barclays PLC for misrepresentations about

its dark pool trading system known as Barclays LX, and shareholders against Fiat Chrysler Automobiles for misrepresentations about its recalls and its diesel emissions defeat devices.

Laura graduated from the Benjamin N. Cardozo School of Law, where she was on the editorial staff of Cardozo's Arts and Entertainment Law Journal and was the recipient of the Jacob Burns Merit Scholarship.

Laura is admitted to practice in the New York State Courts, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second and the Fifth Circuits.

Samir Sidi

Samir Sidi focuses his practice on securities fraud litigation.

Samir participated in the Firm's securities class action case against Brazil's largest oil company, Petrobras, arising from a multi-billion-dollar kickback and bribery scheme, in which the Firm, as sole Lead Counsel, recently achieved a historic $3 billion settlement for the Class, as well as precedent-setting legal rulings.

Previously, Samir represented plaintiffs in disputes related to a variety of financial investments, including the Federal Home Loan Bank of Seattle and the FDIC in their multi-billion-dollar actions against securities dealers to rescind the purchase of certificates backed by residential mortgage loans. He also represented institutional investors in a securities fraud action against Vivendi Universal (*In re Vivendi Universal, S.A. Sec. Litig*., 02 Civ. 5571 (S.D.N.Y.)), where in January 2010 the jury returned a verdict that at the time had an estimated value of up to $9 billion.

Samir also served as a judicial intern for the Administrative Office of the Federal Judiciary – Office of Legislative Affairs in Washington, D.C.

Samir received his LL.L from the University of Ottawa, and his LL.M. in Banking & Financial Law from the Boston University School of Law.

Samir is admitted to practice in New York State.

Allison Tierney

Allison Tierney focuses her practice on securities fraud litigation.

Allison brings to Pomerantz her 10 years' expertise in large-scale securities class action litigation. She participated in the Firm's securities class action case against Brazil's largest oil company, Petrobras, arising from a multi-billion-dollar kickback and bribery scheme, in which the Firm, as sole Lead Counsel, recently achieved a historic $3 billion settlement for the Class, as well as precedent-setting legal rulings.

Prior to joining Pomerantz, Allison worked on securities class action cases at several top New York law firms, representing institutional investors. She has represented plaintiffs in disputes related to antitrust violations, corporate financial malfeasance, and residential mortgage-backed securities fraud.

Allison earned her law degree from Hofstra University School of Law, where she served as notes and comments editor for the *Cyberlaw Journal*. She received her B.A. in Psychology from Boston University, where she graduated magna cum laude.

Allison is conversant in Spanish and is currently studying to become fluent.

Allison is admitted to practice in New York State.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
POMERANTZ LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	20.25
Hearing Transcripts	2,734.80
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous – meal/conference expense	
TOTAL:	$2,755.05

EXHIBIT 49

Jeremy A. Lieberman
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Tel: 212-661-1100
Email: jalieberman@pomlaw.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF POMERANTZ LLP**

I, Jeremy A. Lieberman, declare:

1. I am the Managing Partner of Pomerantz LLP ("Pomerantz"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Gersimos Molfetas and as counsel for IPPs throughout the course of this litigation. The background and experience of Pomerantz and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Pomerantz performed the following work: responded to written and document production discovery on behalf of Gerasimos Molfetas, communicated with Mr. Molfetas, prepared an outline to prepare class representatives for deposition, prepared and defended Mr. Molfetas for his deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Pomerantz's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Pomerantz during this period of time was 54.5, with a corresponding lodestar based on current rates of $44,690. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Pomerantz.

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

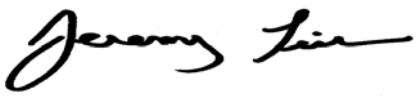
7. Attached hereto as **Exhibit D** is a compilation of my firm's detailed records at historical billing rates. The entries in **Exhibit D** have been redacted per the Court's Order in ECF No. 1803.

8. Attached hereto as **Exhibit E** is a summary of the expenses Pomerantz has incurred during the course of this litigation. Pomerantz expended a total of $2,788.78 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Pomerantz on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at New York, New York.



Jeremy A. Lieberman

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

POMERANTZLLP

Pomerantz LLP is one of the nation's foremost specialists in corporate, securities, antitrust and ERISA class litigation. The Firm was founded in 1936 by the late Abraham L. Pomerantz, one of the "pioneers who developed the class action/derivative action field." [1] Mr. Pomerantz rose to national prominence as a "champion of the small investor" and a "battler against corporate skullduggery." [2] Today, led by Co-Managing Partners Jeremy A. Lieberman and Patrick V. Dahlstrom, the Firm maintains the commitments to excellence and integrity passed down by Mr. Pomerantz.

For 80 years, the Firm has consistently shaped the law, winning landmark decisions that have expanded and protected investor rights, and initiated historic corporate governance reforms. In 2016, The Legal 500 honored Pomerantz as a Leading Firm; Partners Jeremy Lieberman, Marc Gross, Gustavo Bruckner, and Matthew Tuccillo were honored as Super Lawyers® "Top-Rated Securities Litigation Attorneys"; Tamar Weinrib and Louis C. Ludwig were honored as Rising Stars: the *Daily Journal* selected Partner Jennifer Pafiti as one of 40 outstanding lawyers in California under age 40; and Pomerantz was honored by Equal Rights Advocates for its outstanding commitment to diversity and equal opportunities for women. Securities Law 360, in its 2015 *Glass Ceiling Report*, ranked Pomerantz #1 in *Top Plaintiffs' Class Action Law Firms for Women Attorneys*.

Pomerantz is headquartered in New York City, with offices in Chicago, Los Angeles and Paris.

SECURITIES LITIGATION

SIGNIFICANT LANDMARKS IN SECURITIES-RELATED LITIGATIONS

In March 2015, Pomerantz was selected as sole lead counsel, representing lead plaintiff Universities Superannuation Scheme, Ltd. ("USS"), in a historic securities class action against Petróleo Brasileiro SA ("Petrobras"). In July 2015, New York U.S. District Judge Jed S. Rakoff denied in most part Defendants' Motion to Dismiss Lead Plaintiff's Complaint. The class action against Petrobras, brought on behalf of all purchasers of common and preferred American Depositary Shares ("ADSs") on the New York Stock Exchange, as well as purchasers of certain Petrobras debt, principally alleges that Petrobras and its senior executives engaged in a multi-year, multi-billion dollar money-laundering and bribery scheme, which was, of course, concealed from investors.

USS, chosen over three other strong candidates for lead plaintiff, was not the lead plaintiff applicant with the largest losses from the fraud. However, as Pomerantz articulated during the lead plaintiff process, USS's conduct represented the "gold standard" for institutional oversight of proposed lead counsel. Judge Rakoff set a trial date of February 6, 2016.

[1] New York Law Journal (August 1, 1983).
[2] Robert J. Cole, *Class Action Dean*, The National Law Journal, Vol. 1 No. 2 at 1 (Sept. 25, 1978).

In September 2016, Pomerantz, as Co-Lead Counsel, achieved preliminary approval of a $135 million recovery for the Class in *Kaplan v. S.A.C. Capital Advisors, L.P.* This securities class action stems from what has been called the most profitable insider trading scheme in U.S. history. After years of vigorous litigation, billionaire Steven A. Cohen's former hedge fund, SAC Capital Advisors LP, agreed to settle the lawsuit by investors in the drug maker Elan Corp, who said they lost money because of insider trading by one of his portfolio managers.

In 2013 and 2014, Pomerantz secured a series of significant victories in individual actions pursued on behalf of institutional investors in *In re BP plc. Securities Litigation*, MDL 2185 pending in the U.S. District Court for the Southern District of Texas. Pomerantz defeated BP's *forum non conveniens* arguments seeking dismissal of U.S. institutions and, later, foreign institutions, pursuing English common law claims seeking recovery of investment losses stemming from the 2010 Gulf oil spill in both NYSE-traded American Depository Shares and London Stock Exchange (LSE)-traded common stock. Pomerantz also defeated BP's attempt to extend the Securities Litigation Uniform Standards Act to dismiss these claims. Thanks to these rulings, Pomerantz is now leading the only litigation following the Supreme Court's decision in *Morrison v. Nat'l Australia Bank*, which foreclosed use of U.S. federal securities laws to recover for losses in foreign-traded stocks, where U.S. and foreign investors, pursuing foreign claims, seeking recovery for losses in foreign-traded stocks are doing so in a U.S. court. (See fuller discussion below, in "At the Vanguard, Post-*Morrison*.")

In June 2010, the court granted final approval of a $225 million settled proposed by Pomerantz and Lead Plaintiff the Menora Group, with Comverse Technology and certain of Comverse's former officers and directors, after four years of highly contested litigation. The *Comverse* settlement is one of the largest securities class action settlements reached since the passage of the Private Securities Litigation Reform Act ("PSLRA").[3] It is the second-largest recovery in a securities litigation involving the backdating of options, as well as one of the largest recoveries – $60 million – from an individual officer-defendant, Comverse's founder and former CEO, Kobi Alexander. *In re Comverse Technology, Inc. Sec. Litig.,* No. 06-CV-1825 (E.D.N.Y.)

Even before the enactment of the PSLRA, Pomerantz represented state agencies in securities class actions, including the Treasurer of the Commonwealth of Pennsylvania (recovered $100 million) against a major investment bank. *In re Salomon Brothers Treasury Litig.* (S.D.N.Y.).

Pomerantz recovered $50 million for the Treasurer of the State of New Jersey and several New Jersey pension funds in an individual action. This was a substantially higher recovery than what our clients would have obtained had they remained in a related federal class action. *Treasurer of the State of New Jersey v. AOL Time Warner, Inc.* (N.J. Super. Ct. Law Div., Mercer Co.).

Pomerantz has litigated numerous cases for the Louisiana School Employees' Retirement System. For example, as Lead Counsel, Pomerantz recovered $74.75 million in a securities fraud class action against Citigroup, its CEO Sanford Weil, and its now infamous telecommunications analyst Jack Grubman. *In re Salomon Analysts AT&T Litig*., (S.D.N.Y.) Also, the Firm played a major role in a complex antitrust and securities class action which settled for over $1 billion. *In re NASDAQ Market-Makers Antitrust Litig*., (S.D.N.Y.). Pomerantz was a member of the Executive Committee in *In re*

[3] Institutional Shareholder Services, *SCAS "Top 100 Settlements Quarterly Report,"* (Sept. 30, 2010).

Transkaryotic Sec. Litig., (D. Mass), helping to win a $50 million settlement for the class.

In 2008, together with Co-Counsel, Pomerantz identified a substantial opportunity for recovery of losses in Countrywide mortgage-backed securities ("MBS") for three large New Mexico funds (New Mexico State Investment Council, New Mexico Public Employees' Retirement Association, and New Mexico Educational Retirement Board), that had been overlooked by all of the firms then in their securities litigation pool. We then filed the first non-class lawsuit by a public institution with respect to Countrywide MBS. *See New Mexico State Inv. Council v. Countrywide Fin. Corp., et al.,* No. D-0101-CV-2008-02289 (N.M. 1st Dist. Ct.). In Fall 2010, we negotiated for our clients an extremely favorable but confidential settlement.

Over its long history, Pomerantz has achieved significant settlements in numerous cases, a sampling of which are listed below:

- *Kaplan v. S.A.C. Capital Advisors, L..P.*, No. 12 Civ. 9350 (S.D.N.Y.)
  $135 million settlement of class action in which Pomerantz was Co-Lead Counsel.
- *In re Groupon, Inc. Securities Litigation*, No. 12-cv-02450 (N.D. Ill.)
  $45 million settlement of class action in which Pomerantz was sole Lead Counsel.
- *Thomas v. Magnachip Semiconductor Corp. et al*, No. 14-cv-01160 (N.D. Cal.)
  $23.5 million partial settlement of class action in which Pomerantz was sole Lead Counsel.
- *In re Lumber Liquidators, Inc. Securities Litigation,* No. 4:13-cv-00157-AWA-DEM (E.D. Va.)
  $26 million and 1 million shares of common stock tentative settlement in class action in which Pomerantz was sole Lead Counsel.
- *Richard Thorpe and Darrel Weisheit v. Walter Investment Management Corp., et al.*, No. 1:14-cv-20880-UU
  $24 million settlement of class action in which Pomerantz was sole Lead Counsel.
- *In re Sealed Air Corp. Sec. Litig.* (D.N.J. 2010)
  $20 million settlement in class action in which Pomerantz was Co-Lead Counsel representing the Louisiana Municipal Police Employees' Retirement System.
- *In re Elan Corp. Sec. Litig.* (S.D.N.Y. 2005)
  $75 million settlement in class action arising out of alleged accounting manipulations.
- *In re Livent, Inc. Noteholders Sec. Litig.* (S.D.N.Y. 2005)
  $17 million settlement for the class; plus summary judgment against remaining defendants for $36 million (including pre-judgment interest); totaling over 100% of claimed damages.
- *In re Safety-Kleen Corp. Stockholders Litig.* (D. S.C. 2004)
  $54.5 million in total settlements in class action alleging accounting manipulations by corporate officials and auditors; last settlement reached on eve of trial.
- *Mardean Duckworth v. Country Life Insurance Co.* (Ill. Cir. Ct., Cook Cty. 2000)
  $45 million recovery.
- *In re First Executive Corp. Sec. Litig.* (C.D. Cal. 1994)
  $102 million recovery for the class, exposing a massive securities fraud arising out of the Michael Milken debacle.
- *Snyder v. Nationwide Insurance Co.* (Sup. Ct., Onondaga Cty. 1998)
  Settlement valued at $100 million in derivative case arising from injuries to consumers purchasing life insurance policies.
- *In re Boardwalk Marketplace Sec. Litig.* (D. Conn. 1994)
  Over $66 million benefit in securities fraud action.

- *In re National Health Lab., Inc. Sec. Litig.* (S.D. Cal. 1995)
  $64 million recovery.
- *In re Telerate, Inc. Shareholders Litig.* (Del. Ch. 1989)
  $95 million benefit in case alleging violation of fiduciary duty under state law.

Pomerantz has also obtained stellar results for private institutions and Taft-Hartley funds. Below are a few examples:

- *In re Charter Communications, Inc. Secs. Litig*. (W.D. Mo.) (sole Lead Counsel for Lead Plaintiff StoneRidge Investment Partners LLC); $146.25 million class settlement, where Charter also agreed to enact substantive improvements in corporate governance.
- *In re American Italian Pasta Securities Litigation* (W.D. Mo.) (sole Lead Counsel for Lead Plaintiff Ironworkers Locals 40, 361 and 417; $28.5 million aggregate settlements).
- *Richardson and CC Partners, LLC v. Gray* (Sup. Ct. N.Y. Cty.); and *In re Summit Metals*, (Bankr. D. Del.) (two derivative actions where the Firm represented C.C. Partners Ltd. and obtained judgment of contempt against controlling shareholder for having made "extraordinary" payments to himself in violation of a preliminary injunction; persuaded the court to jail him for two years upon his refusal to pay; and, in a related action, won a $43 million judgment after trial and obtained turnover of stock of two companies).

SHAPING THE LAW

Not only has Pomerantz established a long track record of obtaining substantial monetary recoveries for our clients; whenever appropriate, we also pursue corporate governance reforms on their behalf. In *In re Chesapeake S'holder Deriv. Litig*., No. CJ-2009-3983 (Dist. Okla.), for example, the Firm served as co-lead counsel, representing a public pension client in a derivative case arising from an excessive compensation package granted to Chesapeake's CEO and founder. This was a derivative action, not a class action. Yet it is illustrative of the results that can be obtained by an institutional investor in the corporate governance arena. There, we obtained a settlement which called for the repayment of $12.1 million and other consideration by the CEO. The *Wall Street Journal* (November 3, 2011) characterized the settlement as "a rare concession for the 52-year old executive, who has run the company largely by his own rules since he co-founded it in 1989." The settlement also included comprehensive corporate governance reforms.

The Firm has won many landmark decisions that have enhanced shareholders' rights and improved corporate governance. These include decisions that established that:

- shareholders have a right to a jury trial in derivative actions. *Ross v. Bernhard*, 396 U.S. 531 (1970).
- a mortgage-backed securities ("MBS") holder may bring claims if the MBS price declines even if all payments of principal and interest have been made. *New Mexico State Inv. Council v. Countrywide Fin. Corp., et al.,* No. D-0101-CV-2008-02289, Transcript of Proceedings on March 25, 2009 (N.M. 1st Dist. Ct.)
- when a court selects a Lead Plaintiff under the Private Securities Litigation Reform Act ("PSLRA"), the standard for calculating the "largest financial interest" must take into account sales as well as purchases. *In re Comverse Technology Inc. Sec. Litig*., 2007 U.S. Dist. LEXIS 14878 (E.D.N.Y. 2007).

- purchasers of options have standing to sue under federal securities laws. *In re Green Tree Fin. Corp. Options Litig.*, 2002 U.S. Dist. LEXIS 13986 (D. Minn. 2002).
- a company may have the obligation to disclose to shareholders its Board's consideration of important corporate transactions, such as the possibility of a spin-off, even before any final decision has been made. *Kronfeld v. Trans World Airlines, Inc.*, 832 F.2d 726 (2d Cir. 1987).
- specific standards for assessing whether mutual fund advisors breach fiduciary duties by charging excessive fees. *Gartenberg v. Merrill Lynch Asset Mgmt., Inc.*, 740 F.2d 190 (2d Cir. 1984).
- investment advisors to mutual funds are fiduciaries who cannot sell their trustee positions for a profit. *Rosenfeld v. Black*, 445 F.2d 1337 (2d Cir. 1971).
- management directors of mutual funds have a duty to make full disclosure to outside directors "in every area where there was even a possible conflict of interest." *Moses v. Burgin*, 445 F.2d 369 (1st Cir. 1971).
- a managing underwriter can owe fiduciary duties of loyalty and care to an issuer in connection with a public offering of the issuer stock, even in the absence of any contractual agreement. Professor John C. Coffee, a renowned Columbia University securities law professor, commenting on the ruling, stated: "It's going to change the practice of all underwriting." *EBC I, Inc. v. Goldman Sachs & Co.*, 5 N.Y. 3d 11 (2005).

AT THE VANGUARD, POST-*MORRISON*

The April 20, 2010 Deepwater Horizon rig explosion and the resulting oil spill – the worst in U.S. history – devastated countless lives and caused immeasurable environmental damage in the Gulf of Mexico and along its coastlines. The spill also impacted investors in BP plc. ("BP"). Within weeks, the price of BP's ordinary shares and its American Depository Shares (ADS) plummeted nearly 50%, driven down by revelations regarding BP's prior misstatements about its commitment to safety and the true scope of the spill.

Although many BP investors immediately considered their legal options, the U.S. Supreme Court's decision in *Morrison v. Nat'l Australia Bank Ltd.*, 130 S. Ct. 2869 (2010) presented a seeming insurmountable hurdle, in that it barred use of the U.S. federal securities laws to recover losses from investments in foreign-traded securities. Thus, although the U.S. federal securities laws protected purchasers of BP's ADS, which trade on the New York Stock Exchange, the same was not true for the purchasers of BP's ordinary shares, which trade on the London Stock Exchange. For investors who purchased BP common stock, they seemed to have no legal options in the U.S. court system.

With a long tradition of developing innovative ways to advance client interests, Pomerantz responded by developing a new legal theory, placing it once again at the vanguard of ground-breaking litigation. On behalf of its clients, Pomerantz is pursuing common law fraud and negligence claims against BP, in the U.S. courts, to recover losses associated with its clients' BP common stock investments. For investors who also purchased BP's ADS, Pomerantz is simultaneously pursuing U.S. federal securities claims – in the same lawsuit.

Through a series of hard-fought victories, Pomerantz has secured the right of both U.S. and foreign institutional investors to pursue these claims in U.S. federal court. First, in a landmark decision issued in October 2013 (as revised in December 2013), the Honorable Keith Ellison of the United States District Court for the Southern District of Texas denied BP's motion to dismiss Pomerantz's

complaint on behalf of three U.S. pension funds. Judge Ellison rejected BP's argument that the case should be sent to courts in England under the doctrine of *forum non conveniens*, and his decision to apply English law mooted BP's arguments that the case should be dismissed under *Morrison* or the Dormant Commerce Clause of the U.S. Constitution as improper regulation of foreign commerce.

More recently, in decisions issued in October 2014, Judge Ellison denied BP's attempt to dismiss the cases of Pomerantz's foreign institutional clients on *forum non conveniens* grounds. He also rejected BP's attempt to extend the Securities Litigation Uniform Standards Act (SLUSA) to the English common law claims being pursued by Pomerantz's clients, and by extension, rejected BP's argument that SLUSA required the dismissal of our foreign and U.S. non-public institutional clients.

These decisions secured the right of Pomerantz's clients, both foreign and domestic, to pursue English common law claims – in U.S. federal court – to recover their losses in BP's London-traded common shares and its New York-traded ADS. This litigation is literally the first time, post-*Morrison*, that institutional investors have been permitted to pursue foreign claims seeking recovery for foreign traded securities in a U.S. court.

Also in October 2014, Pomerantz secured important rulings regarding the Exchange Act claims being pursued by certain of our clients regarding their ADS losses. Judge Ellison agreed with Pomerantz that *American Pipe* tolling applied to both the statute of limitation and the statute of repose applicable to our Section 10(b) claims. This ruling was significant given the split of authority nationwide and the Supreme Court's expression of interest in the repose issue (which was to have been heard in the *IndyMac* appeal).

These outcomes represent hard-fought, important victories for Pomerantz's clients. In total, Pomerantz currently represents nearly three dozen clients in BP-related litigation, including U.S. public pension funds, U.S. limited partnerships and ERISA trusts, and institutional investors from the U.K., France, the Netherlands, Canada, and Australia.

Pomerantz's BP litigation is overseen by Partners Marc I. Gross, Jeremy A. Lieberman, and Matthew L. Tuccillo.

COMMENTS FROM THE COURTS

Throughout its history, courts time and again have acknowledged the Firm's ability to vigorously pursue and successfully litigate actions on behalf of investors.

In approving the settlement in *Richard Thorpe and Darrel Weisheit, et al. v. Walter Investment Management, et al*., No. 1:14-cv-20880-UU (S.D. Fla.) the Hon. Ursula Ungaro wrote,

> Class Counsel has developed a reputation for zealous advocacy in securities class actions.. . . The settlement amount of $24 million is an outstanding result.

Judge Jed S. Rakoff, in certifying two Classes in *In re Petrobras Sec. Litig.* in February 2016, wrote:

> . . . [O]n the basis not only of USS's counsel's prior experience but also the Court's observation of its advocacy over the many months since it was appointed lead

> counsel, the Court concludes that Pomerantz, the proposed class counsel, is "qualified, experienced and able to conduct the litigation." . . . [T]he Pomerantz firm has both the skill and resources to represent the Classes adequately.

At the May 2015 hearing wherein the Court approved the settlement in *Courtney, et al. v. Avid Technology, et al.*, No. 1:13-cv-10686-WGY (D. Mass.) following oral argument by Jeremy A. Lieberman, the Hon. William G. Young stated,

> This has been very well litigated. It is always a privilege. I don't just say that as a matter of form. And I thank you for the vigorous litigation that I've been permitted to be a part of. (Tr. at 8-9)

At the January 2012 hearing wherein the Court approved the settlement in *In re Chesapeake Shareholder Derivative Litig*. No. CJ-2009-3983 (Okla. Dist.), following oral argument by Marc I. Gross, the Hon. Daniel L. Owens stated,

> Counsel, it's a pleasure, and I mean this and rarely say it. I think I've said it two times in 25 years. It is an extreme pleasure to deal with counsel of such caliber.
> (Tr. at 48)

In approving the $225 million settlement in *In re Comverse Technology Inc. Sec. Litig.*, No. 06-CV-1825 (E.D.N.Y.) in June 2010, Judge Nicholas G. Garaufis stated:

> As outlined above, the recovery in this case is one of the highest ever achieved in this type of securities action. . . . The court also notes that, throughout this litigation, it has been impressed by Lead Counsel's acumen and diligence. The briefing has been thorough, clear, and convincing, and . . . Lead Counsel has not taken short cuts or relaxed its efforts at any stage of the litigation.

In approving a $146.25 million settlement in *In re Charter Communications Sec. Litig.*, 02 Cv1186 (E.D. Mo. 2005), in which Pomerantz served as sole Lead Counsel, Judge Charles A. Shaw praised the Firm's efforts:

> This Court believes Lead Plaintiff achieved an excellent result in a complex action, where the risk of obtaining a significantly smaller recovery, if any, was substantial. In awarding fees to Pomerantz, the Court cited "the vigor with which Lead Counsel . . . investigated claims, briefed the motions to dismiss, and negotiated the settlement." . . .

In approving a $24 million settlement in *In re Force Protection, Inc.* 08 CV 845 (D.S.C. 2011), Judge C. Weston Houk described the Firm as "attorneys of great ability and great reputation" and commended the Firm for having "done an excellent job."

In certifying a class in a securities fraud action against analysts in *DeMarco v. Robertson Stephens*, 2005 U.S. Dist. LEXIS (S.D.N.Y.), Judge Gerard D. Lynch stated that Pomerantz had "ably and zealously represented the interests of the class."

Numerous courts have made similar comments:

- Appointing Pomerantz Lead Counsel in *American Italian Pasta Co. Sec. Litig.*, No 05-CV-0725-W-ODS (W.D. Mo.), a class action that involved a massive fraud and restatements spanning several years, the District Court observed that the Firm ". . . has significant experience (and has been extremely effective) litigating securities class actions, employs highly qualified attorneys, and possesses ample resources to effectively manage the class litigation and protect the class's interests."
- In approving the settlement in *In re Wiring Devices Antitrust Litigation*, MDL Docket No. 331 (E.D.N.Y. Sept. 9, 1980), Chief Judge Jack B. Weinstein stated that "Counsel for the plaintiffs I think did an excellent job. . . . They are outstanding and skillful. The litigation was and is extremely complex. They assumed a great deal of responsibility. They recovered a very large amount given the possibility of no recovery here which was in my opinion substantial."
- In *Snyder v. Nationwide Insurance Co.*, Index No. 97/0633, (N.Y. Supreme Court, Onondaga County), a case where Pomerantz served as Co-Lead Counsel, Judge Tormey stated, "It was a pleasure to work with you. This is a good result. You've got some great attorneys working on it."
- In *Steinberg v. Nationwide Mutual Insurance Co.*, 99 CV 7725 (E.D.N.Y.), Judge Spatt, granting class certification and appointing the Firm as class counsel, observed: "The Pomerantz firm has a strong reputation as class counsel and has demonstrated its competence to serve as class counsel in this motion for class certification." (2004 U.S. Dist. LEXIS 17669 at *24)
- In *Mercury Savings and Loan*, CV 90-87 LHM (C.D. Cal.), Judge McLaughlin commended the Firm for the "absolutely extraordinary job in this litigation."
- In *Boardwalk Marketplace Securities Litigation*, MDL No. 712 (D. Conn.), Judge Eginton described the Firm's services as "exemplary," praised it for its "usual fine job of lawyering . . . [in] an extremely complex matter," and concluded that the case was "very well-handled and managed." (Tr. at 6, 5/20/92; Tr. at 10, 10/10/92)
- In *Nodar v. Weksel*, 84 Civ. 3870 (S.D.N.Y.), Judge Broderick acknowledged "that the services rendered [by Pomerantz] were excellent services from the point of view of the class represented, [and] the result was an excellent result." (Tr. at 21-22, 12/27/90)
- In *Klein v. A.G. Becker Paribas, Inc.*, 83 Civ. 6456 (S.D.N.Y.), Judge Goettel complimented the Firm for providing "excellent . . . absolutely top-drawer representation for the class, particularly in light of the vigorous defense offered by the defense firm." (Tr. at 22, 3/6/87)
- In *Digital Sec. Litig.*, 83-3255Y (D. Mass.), Judge Young lauded the Firm for its "[v]ery fine lawyering." (Tr. at 13, 9/18/86)
- In *Shelter Realty Corp. v. Allied Maintenance Corp.*, 75 F.R.D. 34, 40 (S.D.N.Y.), Judge Frankel, referring to Pomerantz, said: "Their experience in handling class actions of this nature is known to the court and certainly puts to rest any doubt that the absent class members will receive the quality of representation to which they are entitled."
- In *Rauch v. Bilzerian*, 88 Civ. 15624 (Sup. Ct. N.J.), the court, after trial, referred to Pomerantz partners as "exceptionally competent counsel," and as having provided "top drawer, topflight [representation], certainly as good as I've seen in my stay on this court."

ANTITRUST LITIGATION

Pomerantz has earned a reputation for prosecuting complex antitrust and consumer class actions with vigor, innovation, and success. Pomerantz's Antitrust and Consumer Group has recovered billions of dollars for the Firm's business and individual clients and the classes that they represent. Time and again, Pomerantz has protected our free-market system from anticompetitive conduct, such as price fixing, monopolization, exclusive territorial division, pernicious pharmaceutical conduct, and false advertising. Pomerantz's advocacy has spanned across diverse product markets, exhibiting the Antitrust and Consumer Group's versatility to prosecute class actions on any terrain.

Pomerantz has served and is currently serving in leadership or co-leadership roles in several high-profile multi-district litigation class actions. The Firm currently represents a class of lending institutions in New York that originated, purchased outright, or purchased a participation interest in loans paying interest rates tied to the U.S. Dollar Interbank Offered Rate (USD LIBOR), *The Berkshire Bank v. Bank of America Corp.* (S.D.N.Y.) (2012). It is alleged that the class suffered damages as a result of collusive manipulation by the contributor panel banks that artificially increased the USD LIBOR rate during the class period, causing them to receive lower interest than they would have otherwise.

Pomerantz also currently represents baseball and hockey fans in a potentially game-changing antirust class action against Major League Baseball and the National Hockey League challenging the exclusive territorial division of live television broadcasts, internet streaming, and the resulting geographic blackouts. *See Laumann v. NHL* and *Garber v. MLB* (S.D.N.Y.) (2012).

Pomerantz has spearheaded the effort to challenge harmful anticompetitive conduct by pharmaceutical companies—including Pay-for-Delay Agreements—that artificially inflates the price of prescription drugs by keeping generic versions off the market.

Even prior to the 2013 precedential U.S. Supreme Court decision in *Actavis*, Pomerantz litigated and successfully settled the following generic-drug-delay cases:

- *In re Flonase Antitrust Litig.* (E.D. Pa.) (2008) ($35 million);
- *In re Toprol XL Antitrust Litig.* (D. Del.) (2006) ($11 million); and
- *In re Wellbutrin SR Antitrust Litig.* (E.D. Pa.) (2004) ($21.5 million).

Pomerantz's results speak for themselves. Pomerantz served as liaison counsel, a member of plaintiffs' executive committee, and represented the largest retailer class representative in *In re Payment Card Interchange Fee & Merch. Disc. Antitrust Litig.* (E.D.N.Y., Dec. 13, 2013). This monumental antitrust class action resulted in a settlement in excess of $7 billion, which is estimated to be the largest-ever U.S. antitrust settlement.

Other exemplary victories include Pomerantz's prominent role in *In re NASDAQ Mkt.-Makers Antitrust Litig.* (S.D.N.Y.), which resulted in a settlement in excess of $1 billion for class members, one of the largest antitrust settlements in history. Pomerantz also played prominent roles in *In re Sorbates Direct Purchaser Antitrust Litig.* (N.D. Cal.), which resulted in over an $82 million recovery, and in *In re Methionine Antitrust Litig.* (N.D. Cal.), which resulted in a $107 million recovery. These

cases illustrate the resources, expertise, and commitment that Pomerantz's Antitrust Group devotes to prosecuting some of the most egregious anticompetitive conduct.

CORPORATE GOVERNANCE LITIGATION

Pomerantz is committed to ensuring that companies adhere to responsible business practices and practice good corporate citizenship. We strongly support policies and procedures designed to give shareowners the ability to oversee the activities of a corporation. We vigorously pursue corporate governance reform, particularly in the area of excess compensation, where it can address the growing disparity between the salaries of executives and the workers of major corporations. We have successfully utilized litigation to bring about corporate governance reform in numerous cases, and always consider whether such reforms are appropriate before any case is settled.

Pomerantz partners are frequent speakers at domestic and international conferences on the importance of securities fraud actions in such countries as the United Kingdom, France, and Israel. According to Managing Partner Marc Gross, "We need to have these kinds of legal remedies available in order to maintain corporate honesty and accountability."

Pomerantz's Corporate Governance Practice Group, led by Partner Gustavo F. Bruckner, enforces shareholder rights and prosecutes actions challenging corporate transactions that arise from an unfair process or result in an unfair price for shareholders. Most recently, in January 2017, the Group received the approval of the Delaware Chancery Court for a $5.6 million settlement it achieved on behalf of a class of shareholders of Physicians Formula Holdings Inc. over an ignored merger offer in 2012. *In re: Physicians Formula Holdings Inc.*, C.A. No. 7794-VCL (Del. Ch. Ct.).

The Group obtained a landmark ruling in *Strougo v. Hollander*, C.A. No. 9770-CB (Del. Ch. Ct.), that fee-shifting bylaws adopted after a challenged transaction do not apply to stockholders affected by the transaction. They were also able to obtain a *25% price increase* for members of the class cashed out in the going private transaction.

In *Miller v. Bolduc*, SUCV 2015-00807 (Superior Court Massachusetts) the Group caused Implant Sciences to hold its first stockholder annual meeting in 5 years and put an important compensation grant up for a stockholder vote.

In *Smollar v. Potarazu*, C.A. No. 10287-VCN (Del. Ch. Ct.), the Group pursued a derivative action to bring about the appointment of two independent members to the board of directors, retention of an independent auditor, dissemination of financials to stockholders and the holding of first ever in-person annual meeting, among other corporate therapeutics.

In *Hallandale Beach Police Officers and Firefighters' Personnel Retirement Fund vs. lululemon athletica, Inc.,* Civil Action No. 8522-VCP (Del. Ch. Ct.), in an issue of first impression in Delaware, the Chancery Court ordered the production of the chairman's 10b5-1 stock trading plan. The Court found that a stock trading plan established by the company's chairman, pursuant to which a broker, rather than the chairman himself, would liquidate a portion of the chairman's stock in the company, did not preclude potential liability for insider trading.

In *Strougo v. North State Bancorp*, 15 CVS 14696 (North Carolina Superior Court), the Group caused the Merger Agreement to be amended to provide a "majority of the minority" provision for the holders of North State Bancorp's common stock in connection with the stockholder vote on the Merger. As a result of the Action, common stockholders could stop the Merger if they did not wish it to go forward.

Pomerantz's commitment to advancing sound corporate governance principles is further demonstrated by the more than 26 years that we have co-sponsored The Abraham L. Pomerantz Lecture Series with Brooklyn Law School. These lectures focus on critical and emerging issues concerning shareholder rights and corporate governance and bring together top academics and litigators.

Our bi-monthly newsletter, *The Pomerantz Monitor*, provides institutional investors updates and insights on current issues in corporate governance.

PARTNERS

JEREMY A. LIEBERMAN

Jeremy A. Lieberman is Pomerantz's Co-Managing Partner with Patrick Dahlstrom. Mr. Lieberman became associated with the Firm in August 2004, and became a partner in January 2010. He has been honored as a 2016 Super Lawyers® "Top-Rated Securities Litigation Attorney," a recognition bestowed on no more than 5% of eligible attorneys in the New York Metro area.

Mr. Lieberman serves as lead counsel in *In re Petrobras Sec. Litig.,* a closely-watched case arising from a multi-billion dollar kickback and bribery scheme involving Brazil's largest oil company, Petróleo Brasileiro S.A. - Petrobras. Mr. Lieberman has had an integral role in a number of high-profile securities class and derivative actions, including *Comverse Technology Sec. Litig*., in which he and his partners achieved a historic $225 million settlement on behalf of the Class, which was the second-largest options backdating settlement to date.

Mr. Lieberman is lead counsel in a putative securities class action that alleges Barclays PLC misled institutional investor clients about the extent of the banking giant's use of so-called "dark pool" trading systems. This case turns on the duty of integrity owed by Barclays to its clients. He also serves as lead counsel in the Firm's case against Corinthian Colleges, one of the largest for-profit college systems in the country, for alleged misrepresentations about its job placement rates, compliance with applicable regulations, and enrollment statistics. Pomerantz prevailed in the motion to dismiss proceedings, a particularly noteworthy victory because Chief Judge George King of the Central District of California had dismissed two prior lawsuits against Corinthian with similar allegations.

Mr. Lieberman serves as Interim Class Counsel on behalf of a class lenders and financial institutions litigating claims arising out of the London Interbank Offered Rate ("LIBOR") rate rigging scandal. He was lead counsel in *In re Medicis Corp. Sec. Litig*., in which the Court approved an $18 million settlement, and is lead counsel in a number of the Firm's other litigations.

In In re *China North East Petroleum Corp. Sec. Litig*., Mr. Lieberman achieved a significant victory for shareholders in the United States Court of Appeals for the Second Circuit, whereby the Appeals Court ruled that a temporary rise in share price above its purchase price in the aftermath of a corrective disclosure did not eviscerate an investor's claim for damages. The Second Circuit's decision was deemed "precedential" by the New York Law Journal, and provides critical guidance for assessing damages in a § 10(b) action.

Mr. Lieberman regularly consults with Pomerantz's international institutional clients, including pension funds, regarding their rights under the U.S. securities laws. Mr. Lieberman is working with the firm's international clients to craft a response to the Supreme Court's ruling in *Morrison v. Nat'l Australia Bank, Ltd*., which limited the ability of foreign investors to seek redress under the federal securities laws. Currently, Mr. Lieberman is representing several UK and EU pension funds and asset managers in individual actions against BP plc in the United States District Court for the Southern District of Texas.

Mr. Lieberman is a frequent lecturer regarding current corporate governance and securities litigation issues. In December 2013, he spoke at the Annual Provident Funds Coalition Conference in Eilat, Israel on Morrison and its implications for TASE investors. He also recently led a discussion regard U.S. securities class actions in Amsterdam.

Mr. Lieberman graduated from Fordham University School of Law in 2002. While in law school, he served as a staff member of the Fordham Urban Law Journal. Upon graduation, he began his career at a major New York law firm as a litigation associate, where he specialized in complex commercial litigation.

PATRICK V. DAHLSTROM

Patrick Dahlstrom is Pomerantz's Co-Managing Partner with Jeremy A. Lieberman. Mr. Dahlstrom joined Pomerantz as an associate in 1991 and became a partner in January 1996. He is based in the Firm's Chicago office.

Mr. Dahlstrom is a member of the Firm's Institutional Investor Practice and New Case Groups, and has extensive experience litigating cases under the PSLRA. He was partner-in-charge of *In re Comverse Technology Sec. Litig*., No. 06-CV-1825 (E.D.N.Y.), in which the Firm, as Lead Counsel, recovered a $225 million settlement for the Class – the second-highest ever for a case involving the back-dating options, and one of the largest recoveries ever from an individual officer-defendant, the company's founder and former CEO. In *Comverse*, the Firm obtained an important clarification of how courts calculate the "largest financial interest" in connection with the selection of a Lead Plaintiff, in a manner consistent with *Dura*, 544 U.S. 336 (2005). Judge Garaufis, in approving the settlement, lauded Pomerantz: "The court also notes that, throughout this litigation, it has been impressed by Lead Counsel's acumen and diligence. The briefing has been thorough, clear, and convincing, and . . . Lead Counsel has not taken short cuts or relaxed its efforts at any stage of the litigation."

In *DeMarco v. Robertson Stephens*, 2005 U.S. Dist. LEXIS (S.D.N.Y. 2005), Mr. Dahlstrom obtained the first class certification in a federal securities case involving fraud by analysts.

Mr. Dahlstrom's extensive experience in litigation under the PSLRA has made him an expert not only at making compelling arguments on behalf of Pomerantz' clients for Lead Plaintiff status, but also in discerning weaknesses of competing candidates. *In re American Italian Pasta Co. Sec. Litig*. and *Comverse* are the most recent examples of his success in getting our clients appointed sole Lead Plaintiff despite competing motions by numerous impressive institutional clients.

Mr. Dahlstrom was a member of the trial team in *In re ICN/Viratek Sec. Litig*. (S.D.N.Y.), which, after trial, settled for $14.5 million. Judge Wood praised the trial team: "[P]laintiffs counsel did a superb job here on behalf of the class . . . This was a very hard fought case. You had very able, superb opponents, and they put you to your task . . . The trial work was beautifully done and I believe very efficiently done."

Mr. Dahlstrom's speaking engagements include interviews by NBC and the CBC regarding securities class actions, and among others, a presentation at the November 2009 State Association of County

Retirement Systems Fall Conference as the featured speaker at the Board Chair/Vice Chair Session entitled: "Cleaning Up After the 100 Year Storm. How trustees can protect assets and recover losses following the burst of the housing and financial bubbles."

Mr. Dahlstrom is a 1987 graduate of the Washington College of Law at American University in Washington, D.C., where he was a Dean's Fellow, Editor in Chief of the Administrative Law Journal, a member of the Moot Court Board representing Washington College of Law in the New York County Bar Association's Antitrust Moot Court Competition, and a member of the Vietnam Veterans of America Legal Services/Public Interest Law Clinic. Upon graduating, Mr. Dahlstrom served as the Pro Se Staff Attorney for the United States District Court for the Eastern District of New York and was a law clerk to the Honorable Joan M. Azrack, United States Magistrate Judge.

Mr. Dahlstrom is admitted to practice in New York and Illinois, as well as the United States District Courts for the Southern and Eastern Districts of New York, Northern District of Illinois, Northern District of Indiana, Eastern District of Wisconsin, District of Colorado, Western District of Pennsylvania, the United States Courts of Appeals for the Fourth, Sixth, Seventh and Eighth Circuits, and the United States Supreme Court.

GUSTAVO F. BRUCKNER

Gustavo F. Bruckner heads Pomerantz's Corporate Governance Practice, which enforces shareholder rights and prosecutes actions challenging corporate transactions that arise from an unfair process or result in an unfair price for shareholders. Under Mr. Bruckner's leadership, the Corporate Governance Practice has achieved numerous noteworthy litigation successes. He was honored as a 2016 Super Lawyers® "Top-Rated Securities Litigation Attorney," a recognition bestowed on no more than 5% of eligible attorneys in the New York Metro area.

Mr. Bruckner successfully argued *Strougo v. Hollander*, C.A. No. 9770-CB (Del. Ch. Ct. 2015), obtaining a landmark ruling in Delaware that bylaws adopted after stockholders are cashed out do not apply to stockholders affected by the transaction. In the process, Mr. Bruckner and the Corporate Governance team beat back a fee-shifting bylaw and were able to obtain a 25% price increase for members of the class cashed out in the going private transaction. Shortly thereafter, the Delaware Legislature adopted legislation to ban fee-shifting bylaws.

In January 2017, Mr. Bruckner, as Lead Counsel, received the approval of the Delaware Chancery Court for a $5.6 million settlement the Firm achieved on behalf of a class of shareholders of Physicians Formula Holdings Inc. over an ignored merger offer in 2012. *In re: Physicians Formula Holdings Inc.*, C.A. No. 7794-VCL (Del. Ch. Ct.).

In *Miller v. Bolduc*, SUCV 2015-00807 (Mass. Sup. Ct. 2015), Mr. Bruckner and the Corporate Governance group, by initiating litigation, caused Implant Sciences to hold its first stockholder annual meeting in 5 years and to place an important compensation grant up for a stockholder vote.

In *Hallandale Beach Police Officers and Firefighters' Personnel Retirement Fund vs. lululemon athletica, Inc.*, C.A. No. 8522-VCP (Del. Ch. Ct. 2014), in an issue of first impression in Delaware, the Chancery Court ordered the production of the company chairman's Rule 10b5-1 stock trading plan. The Court found that a stock trading plan established by the company's chairman, pursuant to which a

broker, rather than the chairman himself, would liquidate a portion of the chairman's stock in the company, did not preclude potential liability for insider trading.

Mr. Bruckner was co-lead counsel in the matter of *In re Great Wolf Resorts, Inc. Shareholders Litigation*, No. C.A. 7328-VCN (Del. Ch. 2012), obtaining the elimination of stand-still provisions that allowed third parties to bid for Great Wolf Resorts, Inc., resulting in the emergence of a third-party bidder and approximately $94 million (57%) in additional merger consideration for Great Wolf shareholders.

After graduating law school, Mr. Bruckner served as Chief-of-Staff to a New York City legislator. He received his law degree from Benjamin N. Cardozo School of Law in 1992, where he served as an editor of the Moot Court Board.

Mr. Bruckner is a Mentor and Coach to the NYU Stern School of Business, Berkley Center for Entrepreneurial Studies, New Venture Competition. He was a University Scholar at NYU where he obtained a B.S. in Marketing and International Business in 1988 and an MBA in Finance and International Business in 1989.

He is also a Trustee and the Treasurer of the Beit Rabban Day School.

Mr. Bruckner is licensed to practice in New York and New Jersey and is admitted to practice before the United States District Courts for the Eastern and Southern Districts of New York, the United States District Court for the District of New Jersey, United States Court of Appeals for the Second Circuit, and the United States Supreme Court. Mr. Bruckner also serves as an arbitrator in the Civil Court of the City of New York.

EMMA GILMORE

Emma Gilmore became associated with the Firm in May 2012 and became a partner in December 2015. Ms. Gilmore plays an integral role in the Firm's case against Brazil's largest oil company, Petróleo Brasileiro S.A. - Petrobras, arising from a multi-billion dollar kickback and bribery scheme, in which the Firm is Lead Counsel. *In re Petrobras Sec. Litig.,* No. 14-cv-9662 (S.D.N.Y.)

Ms. Gilmore also plays a leading role in the Firm's class action litigation against Deutsche Bank, arising from the bank's $10 billion money-laundering scheme, for which Deutsche Bank was recently fined $425 million by the New York State Department of Financial Services. *In re Deutsche Bank Aktiengesellschaft Sec. Litig.,* No. 16-cv-03495-(AT) (BCM) (S.D.N.Y.)

Among other cases, Ms. Gilmore is also actively involved in the Firm's securities fraud lawsuits concerning British Petroleum's 2010 Deepwater Horizon oil spill, representing a multitude of foreign and domestic public and private pension funds, limited liability partnerships, and investment trusts in individual actions related to Multidistrict Litigation 2185, *In re BP plc. Secs. Litig.*, No. 4:10-md-2185 (S.D. Tex.).

Prior to joining Pomerantz, Ms. Gilmore was a litigation associate with the firms of Skadden, Arps, Slate, Meagher and Flom, LLP and Sullivan & Cromwell, LLP, where she was involved in commercial and securities matters. Her experience includes working on the *WorldCom Securities Litigation*.

Ms. Gilmore also served as a law clerk to the Honorable Thomas C. Platt, United States District Judge for the Eastern District of New York.

Ms. Gilmore graduated *cum laude* from Brooklyn Law School, where she served as a staff editor for the *Brooklyn Law Review*. Ms. Gilmore graduated *summa cum laude* from Arizona State University, with a BA in French and a minor in Business.

Ms. Gilmore is admitted to practice in New York, and the United States District Courts for the Southern and Eastern Districts of New York.

Ms. Gilmore is fluent in Romanian and proficient in French.

MARC I. GROSS

Marc I. Gross served as the Firm's Managing Partner from 2009 to July 2016. He has been with Pomerantz for over three decades, focusing on securities fraud class actions and derivative actions, while also litigating antitrust and consumer cases, and is Lead Counsel in many of the Firm's major pending cases. He is a Fellow of the American Bar Foundation.

Mr. Gross' numerous notable achievements include: *In re BP plc Sec. Litig*. (individual and institutional investors have a right to sue under common law for purchases abroad); *In re Comverse Inc. Sec. Litig*. ($225 million settlement, including a $60 million contribution by the former CEO); *In re Charter Communications Inc. Sec. Litig*. ($146.25 million settlement); *In re Salomon Analyst AT&T Litig*. ($74.75 million settlement); *In re Elan Corp. Sec. Litig*. ($75 million settlement); *and Snyder v. Nationwide Insurance Co*. (derivative settlement valued at $100 million). His role in high-profile cases has garnered international media attention. Mr. Gross has been interviewed on the CBS Evening News, the BBC, and numerous Israeli media sources. In 2012, Benchmark Litigation named Mr. Gross a "Local Litigation Star" in New York. He has been honored as a Super Lawyer seven times, most recently in 2016.

Mr. Gross leads the Firm's ground-breaking litigations against BP. In the wake of *Morrison*, they developed an innovative legal strategy using common law as a viable path to recovery for BP common stockholders – in the U.S. federal court system. In a landmark 97-page decision publicly issued on October 10, 2013, the Honorable Keith Ellison of the United States District Court for the Southern District of Texas denied defendants' motion to dismiss Pomerantz's robust complaint filed on behalf of three U.S. pension funds that had purchased BP ordinary shares and ADS. Judge Ellison rejected defendants' arguments that the case should be sent to courts in England, and his decision to apply English law here negated the need to address defendants' arguments that the case should be dismissed under *Morrison* and the Dormant Commerce Clause of the U.S. Constitution. Pomerantz's clients can now proceed to discovery on their U.S. federal securities claims and their English law claims of deceit (fraud) and negligent misrepresentation.

Mr. Gross has extensive trial experience, including *In re Zila Inc. Securities Litig*. (D.C. Ariz. (PHX)) and *In re Zenith Labs Securities Litig*. (D.C. N.J.) Courts have consistently praised his lawyering. In approving the $225 million settlement in *Comverse*, Judge Garaufis stated, "Throughout this

litigation, [the Court] has been impressed by Lead Counsel's acumen and diligence. The briefing has been thorough, clear, and convincing."

At the January 30, 2012 hearing wherein the Court approved the settlement of *In re Chesapeake Shareholder Derivative Litig.,* (whereby plaintiffs clawed back $13 million in excess compensation paid to CEO Aubrey McClendon) Judge Owens of the District Court of Oklahoma stated, "Counsel, it's a pleasure, and I mean this and rarely say it. I think I've said it two times in 25 years. It is an extreme pleasure to deal with counsel of such caliber."

Approving the $100 million settlement in *Snyder*, where Mr. Gross was the lead Pomerantz lawyer, the court stated: "I think you all did a very, very good job for all the people. You made attorneys look good." Mr. Gross was also the attorney-in-charge of *Texas Int'l Co. Sec. Litig*. (W.D. Okla.), where, in granting class certification, the Court stated: "The performance of plaintiffs' counsel thus far leaves the Court with no doubt that plaintiffs' claims will be vigorously and satisfactorily prosecuted throughout the course of this litigation." In the course of approving the subsequent settlement of the case, the Court added:

> I would like to compliment all the parties and attorneys in this case. . . . You have all worked together better than I think any case I've had that involved these extensive issues and parties and potential problems. And I for one appreciate it. And I think it shows certainly a great deal of professionalism on all your part.

Mr. Gross is a Fellow of the American Bar Association. He has been a member of the New York City Bar Association's Federal Courts Committee, an early neutral evaluator for the Eastern District of New York, and a mediator for the Commercial Division of the Supreme Court of the State of New York. He is currently a Vice President of the Institute of Law and Economic Policy ("ILEP"), a not-for-profit organization devoted to promoting academic research and dialogue in securities law issues and litigation, and for many years was an officer of the National Association of Shareholder and Consumer Attorneys ("NASCAT").

Mr. Gross speaks frequently at legal forums on shareholder-related issues. He recently moderated a panel at the Loyola University Chicago School of Law's Institute for Investor Protection Conference on "Litigating the New Evidentiary Burdens: At the Class Certification Stage and Beyond." In 2013, he spoke at the National Conference on Public Employee Retirement Systems' ("NCPERS") Legislative Conference on "Morrison and Recoveries of Damages Arising From Fraudulent Foreign Investments," and at Loyola University Chicago School of Law's Institute for Investor Protection Conference on "The Effective and Ethical Use of Confidential Witnesses." In 2012, he spoke at the Tel Aviv Institutional Investors Forum; and moderated a panel at the Second Annual Institute for Investor Protection Conference at the Loyola University Chicago School of Law, on "Behavioral Economics Applied: Expert Witnesses, Event Studies, Loss Causation, and Damages Calculation." Among the panelists was Daniel R. Fischel, whose seminal article describing the application of financial economics to securities fraud litigation was a basis for the Supreme Court's decision in *Basic v. Levinson* adopting "fraud on the market." In 2011 he organized a conference on Proxy Access California; and chaired a panel on Pleading and other Pre-Trial requirements impacting class action suits at the annual ILEP conference; and spoke on *Morrison* and on Opportunities under Dodd-Frank for Say On Pay and Say on Contributions at the National Summit on the Future of

Fiduciary Responsibility, organized by the American Conference Institute with responsible-investor.com.

Mr. Gross is valued by foreign investors for his expertise in the relevance to them of securities class actions in the United States, and how they might benefit from participation. In 2012, Mr. Gross spoke at the Tel Aviv Institutional Investors Forum on "Israel's Pyramids/Corporate Governance Lessons from the U.S." and in 2011, participated in a panel at the National Association of Pension Funds Conference in Edinburgh regarding the impact of U.S. class actions on U.K. investors.

Mr. Gross recently authored "Class Certification in a Post-Halliburton II World," published in *Law360* on July 21, 2014. He is the author of the article "Loser-Pays - or Whose 'Fault' Is It Anyway: A Response to Hensler-Rowe's "Beyond 'It Just Ain't Worth It'," which appeared in 64 Law & Contemporary Problems (Duke Law School) (2001). He recently authored "Class Certification in a Post-Halliburton II World," published in *Law360* on July 21, 2014.

Mr. Gross graduated from New York University Law School in 1976, and received his undergraduate degree from Columbia University in 1973.

Mr. Gross is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, the United States Courts of Appeals for the First, Second, Third and Eighth Circuits, and the United States Supreme Court.

JENNIFER PAFITI

Jennifer Pafiti became associated with the Firm in May 2014, and became a partner in December 2015. A dual-qualified U.K. solicitor and U.S. attorney, she is the Firm's Head of Investor Relations and also takes an active role in complex securities litigation, representing clients in both class and non-class action securities litigation. In 2016, the *Daily Journal* selected Ms. Pafiti for its prestigious "Top 40 Under 40" list of the best young attorneys in California. In 2017, Ms. Pafiti was named a Southern California Rising Star by Super Lawyers®.

Ms. Pafiti is an integral member of the Firm's litigation team for *In re Petrobras Sec. Litig.*, a case relating to a multi-billion dollar kickback and bribery scheme at Brazil's largest oil company, Petróleo Brasileiro S.A .- Petrobras, in which the Firm is Lead Counsel. She is also involved in the litigation of *Dabe v. Calavo Growers*, in which the Firm is Lead Counsel.

Ms. Pafiti earned a Bachelor of Science degree in Psychology at Thames Valley University in England prior to studying law. She earned her law degrees at Thames Valley University (G.D.L.) and the Inns of Court School of Law (L.P.C.) in the United Kingdom. Ms. Pafiti is admitted to practice law in England and Wales (Solicitor) and in California.

Before studying law in England, Ms. Pafiti was a regulated financial advisor and senior mortgage underwriter at a major U.K. financial institution. She holds full CeFA and CeMAP qualifications. After qualifying as a Solicitor, Ms. Pafiti specialized in private practice civil litigation which included the representation of clients in high-profile cases in the Royal Courts of Justice. Prior to joining Pomerantz, Ms. Pafiti was an associate with Robbins Geller Rudman & Dowd LLP in in their San Diego office.

Ms. Pafiti regularly travels throughout the United States and Europe to advise clients on how best to evaluate losses to their investment portfolios attributable to financial fraud or other misconduct, and how best to maximize their potential recoveries.

Ms. Pafiti serves on the Honorary Steering Committee of Equal Rights Advocates ("ERA"), which focuses on specific issues that women face in the legal profession. ERA is an organization that protects and expands economic and educational access and opportunities for women and girls.

Ms. Pafiti is admitted to practice in England and Wales; the State of California; and the United States District Courts for the Northern, Central and Southern Districts of California. She is based in Los Angeles.

JOSHUA B. SILVERMAN

Joshua B. Silverman specializes in individual and class action securities litigation. He was lead counsel in *In re Groupon, Inc. Sec. Litig.,* achieving a $45 million settlement, representing one of the highest recoveries as a percentage of damages in the Seventh Circuit. Mr. Silverman was also co-lead counsel in *In re MannKind Corp. Sec. Litig.*, reaching a settlement valued at more than $23 million and setting precedent regarding the use of expert information in a shareholder complaint. He served as co-lead counsel for three large public funds in *New Mexico State Investment Council, et al. v. Countrywide Fin. Corp., et al.*, resulting in a very favorable confidential settlement. He regularly represents clients in controversies involving securities fraud, private equity investments, hedge fund investments, structured financial instruments, securities lending arrangements, and investment consultants. In addition, Mr. Silverman was co-lead counsel in *New Mexico State Inv. Council v. Cheslock Bakker & Associates* (summary judgment award in excess of $30 million), played a key role in the Firm's representation of investors before the United States Supreme Court in *StoneRidge,* and prosecuted many of the Firm's other class cases, including *In re Sealed Air Corp. Sec. Litig*. ($20 million settlement), *Bruce v. Suntech Power Holdings Corp.* ($5 million settlement); *In re AgFeed, Inc. Sec. Litig.* ($7 million settlement); and *In re Hemispherx BioPharma Sec Litig.* ($2.75 million settlement).

Before joining Pomerantz, Mr. Silverman practiced at McGuireWoods LLP and its Chicago predecessor, Ross & Hardies, where he represented one of the largest independent futures commission merchants in commodities fraud and civil RICO cases. He also spent two years as a securities trader, and continues to actively trade stocks, futures, and options for his own account.

Mr. Silverman is a 1993 graduate of the University of Michigan, where he received Phi Beta Kappa honors, and a 1996 graduate of the University of Michigan Law School.

Mr. Silverman is admitted to practice in Illinois, the United States District Court for the Northern District of Illinois, the United States Courts of Appeal for the First, Second, Third, Seventh and Eighth Circuits, and the United States Supreme Court.

LEIGH HANDELMAN SMOLLAR

Leigh Handelman Smollar, formerly Of Counsel to Pomerantz, became a partner in January 2012.

As a member of Pomerantz' Securities Litigation Group, Ms. Smollar plays a key role in litigating class actions against public companies for securities fraud. She was a member of the Pomerantz team in its successful litigation on behalf of three New Mexico pension funds related to Countrywide's mortgage-backed securities, resulting in a very favorable confidential settlement. Ms. Smollar has been a member of the Pomerantz litigation team for many of the cases where significant settlements were obtained. *See In re Sealed Air Corp. Sec. Litig.*, No. 03-CV-4372 (D.N.J.)($20 million settlement approved December 2009); and *In re Safety-Kleen Stockholders Securities Litigation*, 3:00-736-17 (D. S.C.) (as Co-Lead Counsel, Firm obtained a $54.5 million settlement).

In June 2011, as a panelist at the Illinois Public Employee Retirement Systems Summit in Chicago, Illinois, Ms. Smollar gave a presentation entitled "Carrying Out Fiduciary Responsibilities in Management and Investments." She authored several articles and updates for the Illinois Institute for Continuing Legal Education (IICLE) including "Shareholder Derivative Suits and Stockholder Litigation in Illinois," published in IICLE Chancery and Special Remedies 2004 Practice Handbook; "Prosecuting Securities Fraud Class Actions," published in IICLE Chancery and Special Remedies 2009 Practice Handbook, including a 2011 supplement to Chancery and Special Remedies; and a new chapter in the 2013 Edition of the Chancery and Special Remedies Practice Handbook. She also recently submitted an article for publication for the Loyola Law Journal entitled "The Importance Of Conducting Thorough Investigations Of Confidential Witnesses In Securities Fraud Litigation," expected for publication in 2015.

Ms. Smollar is currently litigating *In re Galena Biopharma, Inc.*, 3:14-cv-00367 (D. Or.); *Alizadeh v. Tellabs, Inc.* et. al, 13-cv-537 (N.D. Ill.); *Lubbers v. Flagstar Bancorp, Inc.*, 14-cv-13459 (E.D. MI); and *Cooper v. Thoratec Corp.*, 14-cv-360 (N.D. Ca).

She is a 1993 graduate of the University of Illinois at Champaign-Urbana, where she graduated from the School of Commerce with high honors, and a 1996 graduate of the Chicago-Kent College of Law. Ms. Smollar spent the next five years specializing in insurance defense litigation.

Ms. Smollar is admitted to practice in Illinois, the United States District Court for the Northern District of Illinois, and the United States Courts of Appeals for the Seventh and Eighth Circuits.

MATTHEW L. TUCCILLO

Matthew L. Tuccillo joined Pomerantz in 2011 and was named a Partner in December 2013. He is responsible, on an ongoing basis, for the Firm's litigation of numerous securities fraud class actions pending nationwide, currently including: *In re KaloBios Pharmaceuticals, Inc. Securities Litigation*, No. 15-cv-05841 (N.D. Cal.); *Perez v. Higher One Holdings, Inc., et al.*, No. 14-cv-00755-AWT (D. Conn.); and *Plumley v. Sempra Energy, et al.*, No. 16-CV-512 (S.D. Cal.).

Mr. Tuccillo manages the Firm's securities fraud lawsuits relate to BP's 2010 Gulf oil spill in Multidistrict Litigation 2185, *In re BP p.l.c. Secs. Litig.*, No. 4:10-md-2185 (S.D. Tex.). He briefed and argued successful oppositions to BP's motions to dismiss the claims of nearly 70 institutional

investors, drawing Judge Ellison's praise for the "quality of lawyering," which he called "uniformly excellent." He successfully argued against *forum non conveniens* dismissal, obtaining the first ruling after the Supreme Court's decision in *Morrison v. Nat'l Australia Bank Ltd.*, 130 S. Ct. 2869 (2010) to permit foreign investors pursuing foreign law claims to seek recovery for losses on a foreign stock exchange in a U.S. court. He also successfully argued against extension of the Securities Litigation Uniform Standards Act (SLUSA) to dismiss foreign common law claims by both domestic and foreign investors, and he persuaded the court to toll both the statutes of limitations and repose applicable to U.S. federal securities claims. Mr. Tuccillo also fulfills Pomerantz's roles as MDL 2185 Individual Action Plaintiffs Steering Committee member and sole Liaison with BP and the Court. The Firm's BP clients include nearly three dozen public and private pension funds, investment management firms, limited partnerships, and investment trusts from the U.S., Canada, the U.K., France, the Netherlands, and Australia, seeking recovery for losses in BP's common stock (traded on the London Stock Exchange) and American Depository Shares (traded on the NYSE).

As the Firm's lead litigator in *In re KaloBios Pharmaceuticals, Inc. Securities Litigation*, No. 15-cv-05841 (N.D. Cal.), Mr. Tuccillo negotiated a partial class-wide settlement for a cash/stock fund worth roughly $3 million from a bankrupt pharmaceutical company and its insurance carriers, while retaining the right to continue litigation against its former CEO. The settlement was approved by the bankruptcy court and preliminarily approved by the district court.

Mr. Tuccillo was the Firm's lead litigation lawyer in *In re Silvercorp Metals, Inc. Secs. Litig.*, No. 1:12-cv-09456 (S.D.N.Y.), a securities class action involving a Canadian company with mining operations in China and stock traded on the NYSE. He worked closely with mining, accounting, damages, and market efficiency experts to defeat a motion to dismiss and oversee discovery. After two mediations, the case was resolved for a $14 million all-cash fund. In granting final approval of the settlement, Judge Rakoff noted that the case was "unusually complex," given the technical nature of mining metrics, the need to compare mining standards in Canada, China, and the U.S., and the volume of Chinese-language evidence requiring translation.

Mr. Tuccillo's prior casework includes litigation and resolution of complex disputes over roll ups of consulting companies and of commercial real estate interests. At Pomerantz, he was on the multi-firm team that litigated and settled *In re Empire State Realty Trust, Inc. Investor Litig.*, No. 650607/2012 (N.Y. Sup. Ct.), representing investors in public and private commercial real estate interests against the long-term lessees/operators, the Malkin family and the Estate of Leona Helmsley, regarding a proposed consolidation, REIT formation, and IPO centered around New York's iconic Empire State Building. These efforts achieved broad relief for the class, including a $55 million cash/securities settlement fund, a restructured deal creating a tax benefit estimated at $100 million, expansive remedial disclosures, and important deal protections.

Mr. Tuccillo has also handled shareholder books and records demands, as well as shareholder derivative, consumer, wage and hour, and mergers and acquisitions litigation. His handling of *GSS 5-08 Trust v. Arch Chemicals, Inc.*, et al., No. X-08 FST-CV11-6010654-S (Conn. Sup. Ct.), concerning a Swiss multi-national's acquisition of a Connecticut-based chemicals company, earned the court's praise for his "preparation" and "hard work."

Before joining Pomerantz, Mr. Tuccillo began his career at a large full-service Boston firm, litigating primarily for corporate clients. He also worked at plaintiff-side firms in Boston and Connecticut,

litigating securities, consumer, and wage and hour class actions, as well as complex sale of business disputes. He has helped negotiate numerous multi-million dollar settlements, at times through the use of alternative dispute resolution. His pro bono work includes securing Social Security benefits for a veteran suffering from non-service-related disabilities.

Mr. Tuccillo is a recommended securities litigator by The Legal 500, which evaluates law firms worldwide for cutting edge, innovative work based on client feedback, practitioner interviews, and independent research. He was honored as a 2016 Super Lawyers® "Top-Rated Securities Litigation Attorney," a recognition bestowed on no more than 5% of eligible attorneys in the New York Metro area, after a rigorous process overseen by Thompson Reuters. Since 2014, he has maintained Martindale-Hubbell's highest-available AV® Preeminent™ peer rating, scoring 5.0 out of 5.0 in Securities Law, Securities Class Actions, and Securities Litigation while being described as a "First class, top flight lawyer, especially in complex litigation." Mr. Tuccillo graduated from the Georgetown University Law Center in 1999, where he made the Dean's List. He graduated from Wesleyan University in 1995, and he currently serves as President of the Wesleyan Lawyers Association.

Mr. Tuccillo is a member of the Bars the Supreme Court of the United States; the State of New York; the State of Connecticut; the Commonwealth of Massachusetts; the Second and Ninth Circuit Courts of Appeals; and the United States District Courts for the Southern and Eastern District of New York, Connecticut, Massachusetts, the Northern District of Illinois, and the Southern District of Texas. He is regularly admitted to practice *pro hac vice* in state and federal courts nationwide.

MURIELLE STEVEN WALSH

Murielle Steven Walsh graduated *cum laude* from New York Law School in 1996, where she was the recipient of the Irving Mariash Scholarship. During law school, Ms. Steven Walsh interned with the Kings County District Attorney and worked within the mergers and acquisitions group of Sullivan & Cromwell.

Ms. Steven Walsh joined the Firm in 1998 and became a partner in 2007. During her career at Pomerantz, Ms. Steven Walsh has prosecuted highly successful securities class action and corporate governance cases. She was one of the lead attorneys in prosecuting *In re Livent Noteholders' Securities Litigation*, a securities class action in which she obtained a $36 million judgment against the company's top officers, a ruling which was upheld by the Second Circuit on appeal. Ms. Steven Walsh was also part of the team litigating the *EBC I v. Goldman Sachs* case, where the Firm obtained a landmark ruling from the New York Court of Appeals, that underwriters may owe fiduciary duties to their issuer clients in the context of a firm-commitment underwriting of an initial public offering.

Ms. Steven Walsh, along with Senior Partner Jeremy Lieberman, manages the Firm's case against Corinthian Colleges, one of the largest for-profit college systems in the country, for alleged misrepresentations about its job placement rates, compliance with applicable regulations, and enrollment statistics. Pomerantz prevailed in the motion to dismiss proceedings, a particularly noteworthy victory because Chief Judge George King of the Central District of California had dismissed two prior lawsuits against Corinthian with similar allegations. She is currently litigating *Ruiz v. Citibank*, Case No. 10-cv-5950 ((S.D.N.Y); *Thorpe v. Walter Investment Management Corp*.,

Case No. 14-cv-20880-UU (S.D. Fla.); and *Klein v. Conformis*, Case No. 1:15-CV-13295-GAO (D. Mass.).

Ms. Steven Walsh serves on the Board of Trustees of the non-profit organization Court Appointed Special Advocates for Children ("CASA") of Monmouth County. She also serves on the Honorary Steering Committee of Equal Rights Advocates ("ERA"), which focuses on specific issues that women face in the legal profession are discussed. ERA is an organization that protects and expands economic and educational access and opportunities for women and girls. In the past, Ms. Steven Walsh served as a member of the editorial board for Class Action Reports, a Solicitor for the Legal Aid Associates Campaign, and has been involved in political asylum work with the Association of the Bar of the City of New York.

Ms. Steven Walsh is admitted to practice in New York, the United States District Court for the Southern District of New York, the United States Court of Appeals for the Second Circuit and the United States Court of Appeals for the Sixth Circuit.

MICHAEL J. WERNKE

Michael J. Wernke, who joined Pomerantz as Of Counsel in 2014 and became Partner in 2015, specializes in securities fraud litigation. He was lead counsel in *Thomas v. Magnachip Semiconductor Corp. et al*, in which he recently achieved a $23.5 million partial settlement with certain defendants, pending court approval, securing the settlement despite an ongoing investigation by the Securities and Exchange Commission and shareholder derivative actions. He played an integral role in *In re Lumber Liquidators, Inc. Sec. Litig.*, in which Pomerantz, as co-lead counsel, achieved a settlement of $26 million in cash and 1,000,000 shares of Lumber Liquidators common stock for the Class.

Mr. Wernke, with Pomerantz Managing Partner Jeremy A. Lieberman, leads the Firm's litigation in *In re Libor Based Financial Instruments Antitrust Litig*. Pomerantz is Interim Lead Counsel for the Lender Class in this closely-watched multi-district litigation, which concerns the manipulation of the critical LIBOR rate by the sixteen banks reporting their lending costs to the British Bankers Association. This action was filed against each of the Contributor Panel banks for the USD LIBOR panel, which includes Bank of America Corporation, Citigroup Inc., Credit Suisse Group AG, Bank of Tokyo-Mitsubishi UFJ Ltd., Barclays Bank plc, HSBC Holdings plc, and Deutsche Bank AG. The action seeks hundreds of billions of dollars in damages. Pomerantz has prevailed against defendants' motions to dismiss the claims of our clients, Directors Financial Group and The Berkshire Bank.

During the nine years prior to coming to Pomerantz, Mr. Wernke was a litigator with Cahill Gordon & Reindel LLP, with his primary focus in the securities defense arena. He brings to Pomerantz a unique perspective, with his extensive, successful experience in defending large, multinational financial institutions in securities fraud and commercial litigations.

In 2014 and 2015, Mr. Wernke was voted by his peers, through Super Lawyers, as a "New York Metro Rising Star."

In 2004, Mr. Wernke received his J.D. from Harvard Law School. He also holds a B.S. in Mathematics and a B.A. in Political Science from The Ohio State University, where he graduated *summa cum laude*.

Mr. Wernke is admitted to practice in the State of New York and the United States District Court for the Southern District of New York.

SENIOR COUNSEL

STANLEY M. GROSSMAN

Stanley M. Grossman, Senior Counsel, is the former Managing Partner of Pomerantz. He is recognized as a leader in the plaintiffs' securities bar. He was selected by *Super Lawyers* magazine as an outstanding attorney in the United States for the years 2006 through 2011, and was featured in the New York Law Journal article "*Top Litigators in Securities Field -- A Who's Who of City's Leading Courtroom Combatants*." Mr. Grossman has litigated securities (individual and class), derivative and antitrust actions with the Firm for 39 years.

Mr. Grossman has primarily represented plaintiffs in securities and antitrust class actions, including many of those listed in the firm biography. *See. e.g., Ross v. Bernhard*, 396 U.S. 531; *Rosenfeld v. Black*, 445 F.2d 137 (2d Cir. 1971); *Wool v. Tandem*, 818 F.2d 1433 (9th Cir.); *In re Salomon Bros. Treasury Litig*, 9 F.3d 230 (2d Cir.). In 2008 he appeared before the United States Supreme Court to argue that scheme liability is actionable under Section 10(b) and Rule 10b-5(a) and (c). *See StoneRidge Investment Partners v. Scientific-Atlanta*, No. 06-43 (2007). Other cases where he was the Lead or Co-Lead counsel include: *In re Salomon Brothers Treasury Litigation*, 91 Civ. 5471 (S.D.N.Y. 1994) ($100 million cash recovery); *In re First Executive Corporation Securities Litigation*, CV-89-7135 (C.D. Cal. 1994) ($100 million settlement); *In re Sorbates Direct Purchaser Antitrust Litigation*, C98-4886 (N.D. Cal. 2000) (over $80 million settlement for the class).

In 1992, Senior Judge Milton Pollack of the Southern District of New York appointed Mr. Grossman to the Executive Committee of counsel charged with allocating to claimants hundreds of millions of dollars obtained in settlements with Drexel Burnham & Co. and Michael Milken.

Many courts have acknowledged the high quality of legal representation provided to investors by Mr. Grossman. In *Gartenberg v. Merrill Lynch Asset Management, Inc.*, 79 Civ. 3123 (S.D.N.Y.), where Mr. Grossman was lead trial counsel for plaintiff, Judge Pollack noted at the completion of the trial:

> [I] can fairly say, having remained abreast of the law on the factual and legal matters that have been presented, that I know of no case that has been better presented so as to give the Court an opportunity to reach a determination, for which the court thanks you.

Mr. Grossman was also the lead trial attorney in *Rauch v. Bilzerian* (Super. Ct. N.J.)(directors owed the same duty of loyalty to preferred shareholders as common shareholders in a corporate takeover), where the court described the Pomerantz team as "exceptionally competent counsel." He headed the six week trial on liability in *Walsh v. Northrop Grumman* (E.D.N.Y.) (a securities and ERISA class action arising from Northrop's takeover of Grumman), after which a substantial settlement was reached.

Mr. Grossman frequently speaks at law schools and professional organizations. In 2010, he was a panelist on *Securities Law: Primary Liability for Secondary Actors*, sponsored by the Federal Bar Council, and he presented *Silence Is Golden – Until It Is Deadly: The Fiduciary's Duty to Disclose*, at the Institute of American and Talmudic Law. In 2009, Mr. Grossman was a panelist on a Practicing Law Institute "Hot Topic Briefing" entitled "*StoneRidge*- Is There Scheme Liability or Not?"

Mr. Grossman served on former New York State Comptroller Carl McCall's Advisory Committee for the NYSE Task Force on corporate governance. He is a former president of NASCAT. During his tenure at NASCAT, he represented the organization in meetings with the Chairman of the Securities and Exchange Commission and before members of Congress and of the Executive Branch concerning legislation that became the PSLRA.

Mr. Grossman served for three years on the New York City Bar Association's Committee on Ethics, as well as on the Association's Judiciary Committee. He is actively involved in civic affairs. He headed a task force on behalf of the Association, which, after a wide-ranging investigation, made recommendations for the future of the City University of New York. He serves on the board of the Appleseed Foundation, a national public advocacy group.

Mr. Grossman is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, Central District of California, Eastern District of Wisconsin, District of Arizona, District of Colorado, the United States Courts of Appeals for the First, Second, Third, Ninth and Eleventh Circuits, and the United States Supreme Court.

OF COUNSEL

MICHELE S. CARINO

Michele S. Carino joined Pomerantz as Of Counsel in 2014. An experienced litigator and professional legal writer, Ms. Carino's practice focuses on securities fraud, corporate governance, mergers and acquisitions, and complex commercial cases.

Before joining Pomerantz, Ms. Carino honed her skills as a securities and corporate governance attorney at Stroock and Grant & Eisenhofer, serving clients on both the defense and plaintiff side of class actions, shareholder derivative actions, and other investor protection cases.

Ms. Carino received her bachelor of arts in Economics from Binghamton University with Phi Beta Kappa honors in 1992 and graduated *magna cum laude* from Georgetown University Law Center in 1999. She has taught a legal research and writing seminar at Columbia University Law School, and has served as a Mentor and Coach to Legal Outreach, a constitutional law and college preparatory program for New York City public high school students.

Ms. Carino is admitted to practice law before the Supreme Court of the United States and the United States District Courts for the Southern District of New York and the District of Delaware, and is a member of the bar of the states of New York and Delaware.

JOHN A. KEHOE

John A. Kehoe has served as lead or co-lead counsel in numerous securities and financial fraud cases in federal and state courts on behalf of institutional and individual clients, including *In re Bank of America Corporation Securities Litigation* ($2.4 billion settlement); *In re Wachovia Preferred Securities and Bond/Notes Litigation* ($627 million settlement); *In re Initial Public Offering Securities Litigation* ($586 million settlement resolving 309 consolidated actions); *In re Lehman Brothers Securities and ERISA Litigation* ($516 million settlement); and *In re Marvell Technology Group Ltd. Securities Litigation* ($72 million settlement). Mr. Kehoe is a program faculty member with the National Institute of Trial Advocacy, and served three years as an adjunct faculty member with the Trial Advocacy Training Program at Louisiana State University School of Law.

Prior to joining Pomerantz, Mr. Kehoe was a partner with Girard Gibbs LLP and Kessler Topaz Meltzer & Check, LLP representing institutional investors in securities class and direct actions, and was previously associated with Clifford Chance LLP, a London-based law firm where he represented Fortune 500 companies in securities and antitrust civil litigation, and enforcement actions brought by the Department of Justice, the U.S. Securities and Exchange Commission and the Federal Trade Commission.

Mr. Kehoe is a frequent speaker at conferences focused on shareholder rights and corporate governance issues, including the 2013 National Conference on Public Employee Retirement Systems (Rancho Mirage, CA); 2013 Investment Education Symposium (New Orleans, LA); 2013 Public Funds East Conference (Newport, RI); 2012 Rights and Responsibilities for Institutional Investors (Amsterdam, Netherlands); 2011 European Investment Roundtable (Stockholm, Sweden); 2011 Public Funds Symposium (Washington, D.C.); 2011 National Conference on Public Employee Retirement Systems (Miami Beach, FL); 2010 ESG, USA Global Trends and U.S. Sustainable Investing (NY, NY); 2010 ICGN Annual Conference: "The Changing Global Balances" (Toronto, Canada); 2010 Public Funds West Summit (Scottsdale, AZ); 2009 ICGN Annual Conference: "The Route Map to Reform and Recovery" (Sydney, Australia); and the 2007 European Pensions Symposium (Marbella, Spain).

Mr. Kehoe received his Juris Doctorate, *magna cum laude*, from Syracuse University College of Law, was an associate editor of the Syracuse Law Review, associate member of the Syracuse Moot Court Board and alternate member on the National Appellate Team. He received a Masters of Public Administration from the University of Vermont and Bachelor of Arts from DePaul University. Prior to attending law school, Mr. Kehoe served as a law enforcement officer in the State of Vermont where he was a member of the Special Reaction Team.

Mr. Kehoe is admitted to practice in the States of New York and Pennsylvania, United States District Court for the Southern District of New York, and the U.S. Court of Appeals for the Second Circuit.

H. ADAM PRUSSIN

Mr. Prussin specializes in securities litigation and has extensive experience in derivative actions. He was special litigation counsel in the derivative actions on behalf of Summit Metals, Inc., actions which resulted in entry of a judgment, after trial, of $43 million in cash, plus an order transferring the stock of two multi-million-dollar companies to the plaintiff. Mr. Prussin is Co-Lead Counsel in several of Pomerantz's pending derivative actions.

Mr. Prussin has published several articles on the subject of the standards and procedures for the maintenance or dismissal of derivative actions, including "Termination of Derivative Suits Against Directors on Business Judgment Grounds: From Zapata to Aronson," 39 The Business Lawyer 1503 (1984); "Dismissal of Derivative Actions Under the Business Judgment Rule: Zapata One Year Later," 38 The Business Lawyer 401 (1983); and "The Business Judgment Rule and Shareholder Derivative Actions: Viva Zapata?," 37 The Business Lawyer 27 (1981). In June 2009 he spoke at the 6th Annual Securities Litigation Conference in New York, participating in the panel discussion, "From Behind Enemy Lines: The Perspective of Two Prominent Plaintiff Attorneys."

Before joining the Firm, Mr. Prussin was a named partner in Silverman, Harnes, Harnes, Prussin & Keller, which specializes in representing plaintiffs in shareholder derivative and class action litigation, particularly those involving self-dealing by corporate officers, directors and controlling shareholders. He played a key role in several landmark derivative cases in the Delaware courts, and has appeared frequently before the Delaware Supreme Court.

Mr. Prussin graduated *cum laude* from Yale College in 1969 and, after obtaining a Masters Degree from the University of Michigan in 1971, received his J.D. degree from Harvard Law School in 1974.

Mr. Prussin is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second, Ninth and D.C. Circuits.

BRENDA SZYDLO

Brenda Szydlo joined Pomerantz in January 2016 as Of Counsel. She brings to the Firm more than twenty-five years of experience in complex civil litigation in federal and state court on behalf of plaintiffs and defendants, with a particular focus on securities and financial fraud litigation, litigation against pharmaceutical corporations, accountants' liability, and commercial litigation.

Ms. Szydlo has represented investors in class and private actions that have resulted in significant recoveries, such as *In re Pfizer Inc. Securities Litigation*, where the recovery was $486 million, and *In re Refco, Inc. Securities Litigation*, where the recovery was in excess of $407 million. She has also represented investors in opt-out securities actions, such as in *In re Bank of America Corp. Securities, Derivative & ERISA Litigation*. In addition, Ms. Szydlo has experience in mergers and acquisitions litigation. She played a significant role in obtaining a ground-breaking order enjoining not only the shareholder vote on the merger, but the merger agreement's termination fee and other mechanisms designed to deter competing bids, in *In re Del Monte Co. Shareholder Litigation*.

Prior to joining Pomerantz, Ms. Szydlo served as Senior Counsel at Grant & Eisenhofer P.A., where she represented plaintiffs in securities and financial fraud litigation, and litigation against pharmaceutical corporations and accounting firms. Ms. Szydlo also served as Counsel in the litigation department of Sidley Austin LLP in New York, and its predecessor, Brown & Wood LLP, where her practice focused on securities litigation and enforcement, accountants' liability defense, and commercial litigation.

Ms. Szydlo is a 1988 graduate of St. John's University School of Law, where she was a St. Thomas More Scholar and member of the Law Review. She received a B.A. in economics from Binghamton University in 1985.

Ms. Szydlo is admitted to practice in the State of New York; U.S. District Courts for the Southern and Eastern Districts of New York; and the U.S. Court of Appeals for the Second and Ninth Circuits.

NICOLAS TATIN

French lawyer Nicolas Tatin joined Pomerantz in April 2017 as Of Counsel. He heads the Firm's Paris office and serves as its Director-Business Development Consultant for France, Benelux, Monaco and Switzerland. Mr. Tatin advises institutional investors in the European Union on how best to evaluate losses to their investment portfolios attributable to financial misconduct, and how best to maximize their potential recoveries in U.S. and international securities litigations.

Mr. Tatin was previously a financial lawyer at ERAFP, France's €24bn pension and retirement fund for civil servants, where he provided legal advice on the selection of management companies and the implementation of mandates entrusted to them by ERAFP.

Mr. Tatin began his career at Natixis Asset Management, before joining BNP Paribas Investment Partners, where he developed expertise in the legal structuring of investment funds and acquired a global and cross-functional approach to the asset management industry.

Mr. Tatin graduated in International law and received an MBA from IAE Paris, the Sorbonne Graduate Business School.

AUSTIN P. VAN

Austin P. Van joined Pomerantz in January 2017 as Of Counsel. He brings to the Firm experience in a variety of federal and state securities law matters, including disputes involving publicly traded stocks, RMBS and other ABS, securities lending disputes, and breach-of-trust matters arising in the securities law context.

Mr. Van also has experience in complex commercial litigation, including contract disputes, business torts, consumer fraud, and antitrust matters. He has represented investment banks and other financial sector clients, as well as public and private companies in the technology, energy, pharmaceutical, telecommunications and shipping industries, among others. Mr. Van was previously an associate at WilmerHale and Cravath, Swaine & Moore, both in New York City.

Mr. Van received a J.D. from Yale Law School, where he was an editor of the Yale Law Journal and the Yale Journal of International Law. He has a B.A. from Yale University and an M.Sc. from the London School of Economics.

Mr. Van is admitted to practice law in the State of New York and in the United States District Courts for the Southern and Eastern Districts of New York.

TAMAR A. WEINRIB

Tamar A. Weinrib joined Pomerantz in early 2008 and became Of Counsel to the firm in 2014. Ms. Weinrib focuses on securities fraud litigation. She was honored by Super Lawyers® as a New York Metro Rising Star in 2014, 2015, and 2016.

Ms. Weinrib, with Managing Partner Jeremy Lieberman, is lead counsel in *Strougo v. Barclays PLC*, a securities class action, currently pending before Judge Marrero in the Southern District of New York, that alleges Barclays PLC misled institutional investor clients about the extent of the banking giant's use of so-called "dark pool" trading systems. This case turns on the duty of integrity owed by Barclays to its clients. Ms. Weinrib was the attorney responsible for the litigation of *In re Delcath Systems, Inc. Securities Litigation*, in which Pomerantz recently achieved a settlement of $8,500,000 for the Class. She successfully argued before the Second Circuit in *In re China North East Petroleum Securities Litigation* to reverse the district court's dismissal of the defendants on scienter grounds. In addition to her involvement in several other securities matters pending nationwide, Ms. Weinrib is the Pomerantz attorney responsible for the litigation of *KB Partners I, L.P. v. Pain Therapeutics, Inc., et al.*, a securities fraud case for which Judge Sparks of the Western District of Texas recently granted final approval for a settlement of up to $8,5000,000 for class members.

Before coming to Pomerantz, Ms. Weinrib had over three years of experience as a litigation associate in the New York office of Clifford Chance US LLP, where she focused on complex commercial litigation. Ms. Weinrib has successfully tried pro bono cases, including two criminal appeals and a housing dispute filed with the Human Rights Commission.

Ms. Weinrib graduated from Fordham University School of Law in 2004 and, while there, won awards for successfully competing in and coaching Moot Court competitions.

Ms. Weinrib is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the Second, Third, and Fourth Circuits.

ASSOCIATES

JESSICA N. DELL

Jessica Dell focuses her practice on securities fraud and insurance/healthcare litigation.

Ms. Dell graduated from CUNY School of Law in 2005. At CUNY Ms. Dell spent three semesters in the school's award-winning clinical programs including The Economic Justice Project. She

represented indigent clients in family court and administrative proceedings and authored successful immigration petitions under the Violence Against Women Act.

Ms. Dell interned at the Urban Justice Center and was the recipient of an Everett fellowship for her work in the HIV/AIDS division and at Human Rights Watch.

Ms. Dell has also worked in complex Pro Bono litigation at Pomerantz.

Ms. Dell is admitted to practice in New York.

MARC C. GORRIE

Mr. Gorrie joined Pomerantz in 2014. He focuses his practice on securities fraud litigation and is actively involved in the Firm's securities lawsuit concerning Petróleo Brasileiro S.A.- Petrobras. As a member of the Firm's new matter group, he identifies and investigates potential violations of the federal securities laws.

Prior to joining the Firm, Mr. Gorrie focused his practice on a major securities fraud litigation with a prominent New York law firm. He was actively engaged in legal outreach for the Center for Seafarers' Rights of the Seamen's Church Institute of New York and New Jersey. Mr. Gorrie has previously served as a consultant for an EU development project on the rule of law in The Gambia. He has authored articles on international humanitarian and human rights law published by organizations including the Foreign Policy Association and the Revue de Droit Comparé du Travail et de la Sécurité Sociale. Mr. Gorrie currently serves a member of the Ambassadors Advisory Group for One to One International Consulting, an international aid and development consulting firm headquartered in Ghana.

Mr. Gorrie is a 2010 graduate of Indiana University Maurer School of Law - Bloomington (JD) where he held a research fellowship in legal ethics and was consistently on the Dean's List. He is a 2012 graduate of University of Lund, Sweden (LLM, in conjunction with the Raoul Wallenberg Institute of Human Rights and Humanitarian Law) where he earned honors marks, lectured on U.S. Legal Ethics and on Federal Indian Law, and delivered his thesis on the interaction of tribal, state, federal, and international human rights and labor laws in the United States. Mr. Gorrie is a 2005 graduate of Sarah Lawrence College with a BA in Liberal Arts.

Mr. Gorrie is admitted to practice in New Jersey State and for the United States District Court, District of New Jersey.

GABRIEL HENRIQUEZ

Gabriel Henriquez focuses his practice on corporate governance litigation. He also has experience in commercial real estate, trusts & estates, and general business law in the Southern California region.

Mr. Henriquez is a 2012 graduate of the University of Southern California Gould School of Law. During his time there, he co-founded the Critical Legal Scholars Association and served as its vice

president. He also clerked for Judge Kelvin Filer at the Superior Court of California in Compton. Mr. Henriquez earned his LL.M. in International Business and European Union Law from the Université Lyon III in France.

Mr. Henriquez is admitted to practice in New York and California State Courts, as well as the United States District Courts for the Central District of California, the Southern District of New York, and the Eastern District of New York.

J. ALEXANDER HOOD II

J. Alexander Hood II focuses his practice on securities litigation. As a member of the firm's new matter group, he identifies and investigates potential violations of the federal securities laws.

Prior to joining Pomerantz, Mr. Hood was a litigation associate at Alston & Bird LLP and an attorney at Bernstein Litowitz Berger & Grossmann LLP, where he was involved in commercial, financial services, corporate governance and securities matters.

Mr. Hood graduated from Boston University School of Law (J.D.) and from the University of Oregon School of Law (LL.M.). While in law school, Mr. Hood clerked for the American Civil Liberties Union of Tennessee and, as a legal extern, worked on the Center for Biological Diversity's Clean Water Act suit against BP in connection with the Deepwater Horizon oil spill. Mr. Hood graduated from Johns Hopkins University with a BA in History.

Mr. Hood is admitted to practice in New York and the United States District Courts for the Southern and Eastern Districts of New York and the District of Colorado.

AATIF IQBAL

Aatif Iqbal focuses his practice on securities fraud litigation.

Before joining Pomerantz, Mr. Iqbal was a litigation associate at Cleary Gottlieb Steen & Hamilton LLP, where his practice involved bankruptcy, securities, and complex commercial litigation matters. Mr. Iqbal also served as a law clerk for the Honorable Patricia A. Seitz, United States District Judge for the Southern District of Florida.

Mr. Iqbal graduated cum laude from Harvard Law School, where he earned a Dean's Scholar in First Amendment Law and served as Managing Editor of the Harvard International Law Journal and Managing Technical Editor of the Harvard Human Rights Journal. He graduated cum laude from Yale University with a B.A. in Political Science.

Mr. Iqbal is admitted to practice in New York.

OMAR JAFRI

Omar Jafri's practice focuses on securities fraud litigation.

Before joining Pomerantz LLP, he was a law clerk to Judge William S. Duffey, Jr. of the United States District Court for the Northern District of Georgia. Mr. Jafri was also an associate at Jenner & Block LLP's Chicago Office, where he represented clients in a wide variety of matters, including securities litigation, complex commercial litigation, white collar criminal defense and internal investigations.

During the last several years, Mr. Jafri has litigated major disputes on behalf of institutional investors arising out of the credit crisis, including disputes relating to Collateralized Debt Obligations, Residential Mortgage-Backed Securities, Credit Default Swaps and other complex financial investments. He also has provided pro bono representation to several individuals charged with first-degree murder and attempted murder in the State and Federal courts of Illinois.

Mr. Jafri graduated, magna cum laude, from the University of Illinois College of Law, where he was a Harno Scholar, and represented the College of Law in the Midwest Moot Court competition, winning second place for best oral advocate in the preliminary round and first place for best oral advocate in the semi-final round. He received his B.A. from the University of Texas at Austin, where he was on the Dean's Honor List and the University Honors List.

Mr. Jafri is admitted to practice in Illinois, and the United States District Courts for the Northern District of Illinois and the Northern District of Indiana.

DARYA KAPULINA-FILINA

Darya Kapulina-Filina focuses her practice on corporate governance litigation.

Ms. Kapulina-Filina has nine years' experience as a litigator. Prior to joining Pomerantz in July 2016, she was an associate and of counsel at Pearl Cohen Zedek Latzer Baratz's corporate and IP litigation department.

Ms. Kapulina-Filina obtained her J.D. from Hofstra University School of Law in 2006. While in law school, she served as judicial clerk in the Queens County Civil Court.

Ms. Kapulina-Filina has been named a Rising Star by the *New York Metro Super Lawyers Magazine* for the past three years, and was listed as one of the Top Women Attorneys in New York in the *New York Times Magazine*.

She is admitted to practice in New York; the United States District Courts for the Southern and the Eastern Districts of New York; and the United States Courts of Appeals for the Second Circuit and the Federal Circuit.

Ms. Kapulina-Filina is fluent in Russian.

ADAM GIFFORDS KURTZ

Adam Giffords Kurtz focuses his practice on antitrust litigation.

Mr. Kurtz served as a law clerk to the Honorable Juan G. Burciaga, then Chief United States District Judge, District of New Mexico and began his career as a litigation associate at Cravath, Swaine & Moore, where he worked on complex securities fraud and antitrust litigation. He was also a solo practitioner in New Mexico where he concentrated on federal criminal defense and civil litigation. In addition, Mr. Kurtz served as an Assistant Corporation Counsel in the General Litigation and Labor and Employment law divisions of the New York City Law Department.

Mr. Kurtz graduated *cum laude* from New York Law School in 1988, where he was Book Review Editor of the New York Law School Law Review. In June 2009, Mr. Kurtz received an MBA from the Baruch/Mt. Sinai Graduate Program in Health Care Administration. He is a member of the American Health Lawyers Association.

Mr. Kurtz is admitted to practice in New York and the United States District Courts for the Southern and Eastern Districts of New York.

LOUIS C. LUDWIG

Louis C. Ludwig focuses his practice on securities fraud litigation. He has been honored as a 2016 Super Lawyers® "Rising Star" in the Chicago Metro area.

Mr. Ludwig graduated from Rutgers University School of Law in 2007, where he was a Dean's Law Scholarship Recipient, interned at South Jersey Legal Services, served as a Certified Legal Intern in the Rutgers-Camden Children's Justice Clinic, and participated in Advanced Moot Court.

After serving as a law clerk to the Honorable Arthur Bergman, Superior Court of New Jersey, Mr. Ludwig began his career as a litigation associate at a boutique Chicago law firm specializing in consumer protection class actions.

Mr. Ludwig is admitted to practice in New Jersey, Illinois, the United States Courts of Appeal for the Seventh and Ninth Circuits, and the United States District Courts for the District of New Jersey and the Northern District of Illinois.

MATTHEW C. MOEHLMAN

Matthew C. Moehlman focuses his practice on securities fraud litigation.

Prior to joining Pomerantz in 2015, Mr. Moehlman practiced securities litigation at two prominent federal securities law firms, where he represented institutional investors in complex securities fraud cases, shareholder advocacy, corporate governance matters, and mergers and acquisitions litigation. Mr. Moehlman was a member of the Lead or Co-Lead counsel teams that successfully prosecuted *In re Aeropostale Securities Litigation*, *In re Colonial BancGroup, Inc. Securities Litigation*, *Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al.* ("*Freddie Mac*"), *In re Delphi Corporation*

Securities Litigation, *In re SFBC International, Inc. Securities Litigation*, *In re Converium Holding AG Securities Litigation*, and *In re Suprema Specialties, Inc. Securities Litigation*. His M&A litigation experience includes *In re El Paso Corporation Shareholder Litigation*.

Mr. Moehlman received a J.D. from the University of Virginia School of Law. He earned an A.B. in English and American Literature & Language from Harvard University.

Mr. Moehlman is admitted to practice in New York and Texas, and the United States District Court for the Southern District of New York.

VERONICA V. MONTENEGRO

Veronica V. Montenegro focuses her practice on securities fraud litigation.

Prior to joining Pomerantz, Ms. Montenegro served for seven years as an Assistant Attorney General in the Investor Protection Bureau in the Office of the New York State Attorney General. Ms. Montenegro represented the Office in some of its most high-profile financial fraud prosecutions. She worked on a case against a Madoff feeder-fund manager which resulted in the return of millions of dollars to defrauded investors. She was a member of the Residential Mortgage Backed Securities (RMBS) Working Group, comprised of State and Federal prosecutors tasked with investigating and prosecuting mortgage securities fraud, which has resulted in billions of dollars in recoveries. In recognition of her work in the RMBS Working Group, Ms. Montenegro was awarded the Louis Lefkowitz Award for Exceptional Service. Ms. Montenegro also worked on cases involving insider trading, auction rate securities and foreign exchange execution.

Ms. Montenegro graduated from Fordham University School of Law in 2008. During law school, she served as a member of the Fordham International Law Journal and in Fordham's Moot Court Board. Additionally, she served as a judicial extern to the Honorable Ronald L. Ellis, Magistrate Judge for the Southern District of New York. Ms. Montenegro graduated from New York University's College of Arts and Science is 2004, cum laude, with a double major in Political Science and Latin American Studies.

Ms. Montenegro is admitted to practice in the States of New York and New Jersey.

JUSTIN S. NEMATZADEH

Justin S. Nematzadeh focuses his practice on securities fraud litigation.

Prior to joining Pomerantz in 2015, Mr. Nematzadeh practiced at Gibson, Dunn & Crutcher LLP. His practice at Gibson Dunn involved federal and state complex litigation and internal and regulatory investigations, focusing on securities and antitrust litigation. Additionally, for his work in representing plaintiffs in *Toney-Dick v. Doar*, he was awarded a 2013 Pro Bono Publico award from The Legal Aid Society.

Mr. Nematzadeh earned his J.D. degree, *cum laude*, from Fordham University School of Law. During law school, he served as a member of the *Fordham Urban Law Journal* and as a business editor of the Fordham Dispute Resolution Society. Additionally, he served as a judicial intern to the Honorable

Stuart M. Bernstein of the United States Bankruptcy Court for the Southern District of New York. He earned his B.B.A. degree, with distinction, from the University of Michigan Stephen M. Ross School of Business, with an emphasis in finance and corporate strategy. During business school, he was awarded a University of Michigan Alumnae Council MBNA Scholarship.

Mr. Nematzadeh is the co-author of the *Delaware Business Court Insider* article entitled "Lead Plaintiffs' Shareholdings Draw Chancery Review." He has also contributed to chapters in the American Bar Association's *Antitrust Law Developments*, Matthew Bender's *Antitrust Laws and Trade Regulation*, and to Professor Deborah W. Denno's chapter entitled "When Willie Francis Died: The 'Disturbing' Story Behind One of the Eighth Amendment's Most Enduring Standards of Risk" in John H. Blume and Jordan M. Steiker's book, *Death Penalty Stories*.

Mr. Nematzadeh is admitted to practice law in New York and the United States District Courts for the Southern and Eastern Districts of New York. He is a member of the American Bar Association and the New York State Bar Association.

JENNIFER BANNER SOBERS

Jennifer Banner Sobers focuses her practice on securities fraud litigation.

In addition to her involvement in numerous cases pending nationwide, Ms. Sobers currently plays an integral role on the team litigating *In re Petrobras Sec. Litig.,* arising from a multi-billion dollar kickback and bribery scheme involving Brazil's largest oil company, Petróleo Brasileiro S.A. - Petrobras.

Prior to joining Pomerantz, Ms. Sobers was an associate with a prominent law firm in New York where her practice focused on complex commercial litigation, including securities law and accountants' liability. An advocate of pro bono representation, Ms. Sobers earned the Empire State Counsel honorary designation from the New York State Bar Association and received an award from New York Lawyers for the Public Interest for her pro bono work.

Ms. Sobers received her B.A. from Harvard University (with honors), where she was on the Dean's List, a Ron Brown Scholar, and a recipient of the Harvard College Scholarship. She received her J.D. from University of Virginia School of Law were she was a participant in the Lile Moot Court Competition and was recognized for her pro bono service.

She is a member of the New York City and New York State Bar Associations. She is also a member of the Association of Arbitrators.

Ms. Sobers is admitted to practice in New York, the United States District Court for the Southern District of New York, and the United States Court of Appeals for the Second and Ninth Circuits.

SUSAN J. WEISWASSER

Susan J. Weiswasser focuses her practice on securities fraud litigation.

Ms. Weiswasser graduated from Brooklyn Law School in 2000. While there, she served as a law clerk intern to the Honorable Edward R. Korman, Judge of the United States District Court for the Eastern District of New York. She also served as a legal intern with the New York State Capital Defender Office. As an attorney, she has worked with the Pro Bono Bankruptcy Clinic of the New York City Bar Association. For the last several years, Ms. Weiswasser has been a volunteer lawyer with the City Bar's Monday Night Law Clinic, a community service program providing the public with free consultations in several areas including consumer, landlord-tenant, and matrimonial law.

At Pomerantz, Ms. Weiswasser is a member of the team litigating the securities lawsuit against Petróleo Brasileiro (Petrobras).

Ms. Weiswasser is a member of the New York City Bar Association and the Federal Bar Council. She is admitted to practice in New York, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Court of Appeals for the Third Circuit.

STAFF ATTORNEYS

HUI M. CHANG

Hui M. Chang joined Pomerantz in 2015 and focuses her practice on antitrust and securities fraud litigation. She is a member of Pomerantz's team for two securities class actions against Brazilian companies: *In re Petrobras Sec. Litig*., and *Manidhar Kukkadapu, et al. v. Embraer, et al.*

Ms. Chang received her J.D. from University of California, Hastings College of the Law, and her B.A. in Political Science from the University of California, Berkeley.

Ms. Chang is admitted to practice in the State of New York and the United States District Court for the Southern District of New York.

ÁTILA DE CARVALHO BEATRICE CONDINI

Átila de Carvalho Beatrice Condini, an international attorney at Pomerantz, focuses on class action securities litigation.

Mr. Condini brings to Pomerantz his 13 years' expertise in complex Brazilian federal legal, procedural, and regulatory issues. He is a member of Pomerantz's team for three securities class actions against Brazilian companies: *In re Petrobras Sec. Litig*., *Manidhar Kukkadapu, et al. v. Embraer, et al*., and *Banco Safra S.A. - Cayman Islands Branch* v. *Samarco Mineração S.A.* et al.

Mr. Condini is a partner (on leave) at the law firm, Condini & Tescari Advogados, in São Paolo, Brazil, where he was responsible for the tax and litigation divisions. Before that, he was an associate

and senior associate at two other major Brazilian law firms in São Paolo. During that period, he successfully worked on cases that became benchmarks in the Brazilian legal scenario. In one of them, he prepared a brief in the Extraordinary Appeal n° 559.937, whose thesis was accepted by the Brazilian Supreme Court, reducing the social contribution taxes (PIS / COFINS-Importação) levied on imports. In another case, he defended an advanced interpretation about D&O responsibilities, which was also accepted by the Brazilian Supreme Court in the Extraordinary Appeal n° 562.276.

Mr. Condini has also been attentive to social causes, not only practicing pro bono, but also in the human rights field. For example, Mr. Condini conducted a legal research project that ultimately resulted in the human rights group, Tortura Nunca Mais, being able to help fund and support the creation of a free virtual library focused on keeping alive Brazilian recent history for future generations. In 2006, Mr. Condini received a Bachelor of Laws degree from Pontifical University Catholic of São Paulo ("PUC/SP"). In 2008, he received a specialized law degree in taxation from PUC/SP.

RICHARD S. ORTIZ

Richard S. Ortiz focuses his practice on securities litigation.

Prior to joining Pomerantz, Mr. Ortiz worked as an Attorney Consultant in the Legal and Compliance Department of the asset management business of BNP Paribas. While there, he focused on identifying legal and compliance risks within BNPP IP North America and ensured that such risks were effectively mitigated with appropriate controls.

Mr. Ortiz received a Bachelors of Arts in English in 1998 from the State University of New York at Buffalo. He received his Masters of Law in Financial Services Law from New York Law School, with a thesis on the cross-border application of Dodd-Frank and the external and internal business conduct rules for SWAP dealers and major SWAP participants. Mr. Ortiz received his Juris Doctor degree from the University of Buffalo Law School, with honors in American Jurisprudence; Environmental Law and Technology; and Future Interests. He also received the Kenneth A. Gomez Memorial Award, which is presented to the law student who contributed most to the goals of equality and justice for all minorities. Mr. Ortiz was a Philip C. Jessup International Moot Court Semifinalist; was on the staff of the Buffalo Intellectual Property Law Journal; and was an active contributor for Legal Services for the Elderly of Western New York.

Mr. Ortiz is admitted to practice in New York State, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Supreme Court.

Mr. Ortiz is bilingual in English and Spanish.

LAURA M. PERRONE

Laura M. Perrone focuses on class action securities litigation.

Prior to joining Pomerantz, Ms. Perrone worked on securities class action cases at Labaton Sucharow. Preceding that experience, she represented plaintiffs at her own securities law firm, the Law Offices of Laura M. Perrone, PLLC.

Ms. Perrone graduated from the Benjamin N. Cardozo School of Law, where she was on the editorial staff of Cardozo's Arts and Entertainment Law Journal, and was the recipient of the Jacob Burns Merit Scholarship.

Ms. Perrone is admitted to practice in the New York State Courts, the United States District Courts for the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second and the Fifth Circuits.

EXHIBIT B

EXHIBIT B

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

Firm Name: POMERANTZ LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jayne A. Goldstein (P)			14.40		37.60				2.50						54.50	$820.00	$44,690.00
Name (P)															0.00	$0.00	$0.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**14.40**	**0.00**	**37.60**	**0.00**	**0.00**	**0.00**	**2.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**54.50**		**$44,690.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**14.40**	**0.00**	**37.60**	**0.00**	**0.00**	**0.00**	**2.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**54.50**		**$44,690.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

POMERANTZ LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Jayne A. Goldstein	6/1/2013 – 12/31/2013	$735
Jayne A. Goldstein	1/1/2014 – 12/31/2014	$770
Jayne A. Goldstein	1/1/2015 – 12/31/2015	$805
Jayne A. Goldstein	1/1/2016 – 12/31/2016	$820
NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

(REDACTED)

Goldstein, Jayne				rate	hours	lodestar
06/28/2013	JAG	9	review email re: amended consolidated complaint	$735.00	0.10	73.50
06/29/2013	JAG	9	[redacted]	$735.00	0.40	294.00
07/01/2013	JAG	9	review amended complaint	$735.00	0.80	588.00
07/02/2013	JAG	9	[redacted]	$735.00	0.70	514.50
09/27/2014	JAG	9	meet with client to go over preservation of documents	$770.00	0.50	385.00
04/29/2015	JAG	3	telephone call w/J. Prince regarding discovery (.1) ; review requests for production and roggs (.4)	$805.00	0.50	402.50
05/01/2015	JAG	3	telephone call [redacted] and J. Prince regarding discovery responses	$805.00	0.40	322.00
05/04/2015	JAG	3	telephone call [redacted] regarding discovery responses (1); T/c Josh Prince regarding discovery reponses (.3)	$805.00	1.30	1,046.50
05/12/2015	JAG	3	review responses to discovery prepared by lead counsel	$805.00	0.70	563.50
05/12/2015	JAG	3	telephone call and follow up email to [redacted]	$805.00	0.30	241.50
05/12/2015	JAG	3	telephhone call David Young and follow up email	$805.00	0.10	80.50
05/12/2015	JAG	3	complete verification	$805.00	0.30	241.50
06/11/2015	JAG	3	communicate with [redacted]	$805.00	0.20	161.00
09/10/2015	JAG	3	telephone call J. Prince re deposition of [redacted]	$805.00	0.20	161.00
09/17/2015	JAG	3	review email concerning deposition of [redacted] telephone call J. prince to discuss	$805.00	0.20	161.00
09/25/2015	JAG	3	email Steven Sklaver about [redacted] deposition	$805.00	0.10	80.50
09/30/2015	JAG	3	telephone call with [redacted] about upcoming deposition and discovery responses;	$805.00	0.50	402.50
09/30/2015		3	telephone call J. Prince	$805.00	0.20	161.00
10/29/2015	JAG	3	travel from Delray Beach to Weston Fl. To meet with [redacted] to discuss upcoming deposition	$805.00	3.00	2,415.00
11/03/2015	JAG	5	review deposition of anther class member to prepare to defend deposition of [redacted]	$805.00	0.60	483.00
11/04/2015	JAG	5	review deposition of anther class member to prepare to defend deposition of [redacted]; prepare outline for deposition	$805.00	3.00	2,415.00
11/05/2015	JAG	5	[redacted]	$805.00	2.50	2,012.50
11/05/2015	JAG	5	prepare outline for deposition	$805.00	1.50	1,207.50
11/06/2015	JAG	5	review deposition of class rep;	$805.00	3.00	2,415.00
11/06/2015	JAG	5	review complaint	$805.00	1.00	805.00
11/06/2017	JAG	5	prepare outline	$805.00	4.00	3,220.00
11/08/2015	JAG	5	travel from Delray Beach to Weston and back and prep [redacted]	$805.00	5.00	4,025.00
11/09/2015	JAG	5	travel from Delray Beach to Weston and back; attend and defend deposition;	$805.00	10.80	8,694.00
11/09/2015	JAG	5	telephone call co- counsel	$805.00	0.20	161.00
11/10/2015	JAG	3	review draft supplemental objections to second set or interrogatories;	$805.00	0.50	402.50
11/10/2015	JAG	5	telephone call J. Prince to discuss deposition and possible supplementation of response;	$805.00	0.10	80.50
11/10/2015	JAG	5	communicate with [redacted]	$805.00	0.10	80.50
11/10/2015	JAG	5	review email summarizing deposition highlights (.2); review portions of rough transcript for accuracy (.2)	$805.00	0.40	322.00
11/13/2015	JAG	3	meeting with [redacted] to review rogg responses and get verification signed	$805.00	1.00	805.00
12/10/2015	JAG	5	email co-counsel about dep transcript	$805.00	0.10	80.50
12/11/2015	JAG	5	prepare and send deposition and exhibits to J. Prince	$805.00	0.50	402.50
01/04/2016	JAG	5	review deposition and prepare errata	$820.00	3.50	2,870.00
01/05/2016	JAG	5	complete errata	$820.00	0.60	492.00
01/05/2016	JAG	5	communicate with [redacted] about outstanding document (.2)	$820.00	0.20	164.00
01/12/2016	JAG	3	Travel from Delray Beach to Weston and back to meet with [redacted] to obtain original document from client.	$820.00	2.40	1,968.00
01/12/2016	JAG	3	telephone call J. Prince	$820.00	0.10	82.00
01/14/2016	JAG	3	telephone call [redacted] and email co-lead counsel	$820.00	0.30	246.00

01/26/2016	JAG	3	travel from Delray Beach to Weston and back to obtain original paperwork from [redacted] requested by Defendants; meet with [redacted]	$820.00	2.00	1,640.00
02/02/2016	JAG	3	communicate with co-counsel concerning deposition of [redacted]	$820.00	0.10	82.00
03/11/2016	JAG	5	review email and discovery from lead counsel	$820.00	0.20	164.00
03/14/2016	JAG	5	prepare verification for [redacted]		0.10	82.00
03/14/2016	JAG	5	review order approving amendment		0.10	82.00
03/14/2016	JAG	5	email co-lead counsel to determine necessity of having client sign verification	$820.00	0.10	82.00
ATTORNEY TOTAL					**54.50**	**43,860.50**
FIRM'S TOTAL					**54.50**	**43,860.50**

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
POMERANTZ LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	2,734.80
Investigation	
Lexis/Westlaw	12.60
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	27.93
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	13.45
Miscellaneous	
TOTAL:	2,788.78

EXHIBIT 50

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF MARC G. REICH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF REICH RADCLIFFE & HOOVER LLP**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Marc G. Reich, declare:

1. I am a partner of Reich Radcliffe & Hoover LLP, FKA Reich Radcliffe & Kuttler LLP, ("RRH"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representative Tom Pham and as counsel for IPPs throughout the course of this litigation. The background and experience of RRH and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, RRH performed the following work: Updated Mr. Pham on the status of and developments in the case and responded to his questions; obtained and organized documents and information from Mr. Pham relating to his purchases of lithium ion batteries and products; drafted and revised discovery responses for Mr. Pham and organized his document production; prepared Mr. Pham for and defended his deposition; and communicated with and obtained Mr. Pham's approvals for settlements obtained in this case.

5. Attached hereto as Exhibit B is a billing summary of RRH's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by RRH. Attached hereto as Exhibit C is a compilation of my firm's detailed time records at historical billing rates. The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by RRH and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with my Declaration of in Support of Indirect

Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of RRH and filed on May 26, 2017. (ECF No. 1813-31). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by RRH since June 1, 2013 was 100.6, with a corresponding lodestar of $58,785 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses RRH has incurred from June 1, 2013 to present, plus applicable case filing fees. RRH expended a total of $151.41 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by RRH on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by RRH in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 9, 2019 at RSM, CA.

/s/ Marc G. Reich

Marc G. Reich

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

REICH RADCLIFFE & HOOVER
L•L•P
ATTORNEYS AT LAW
4675 MACARTHUR COURT, SUITE 550
NEWPORT BEACH, CALIFORNIA 92660
TELEPHONE: (949) 975-0512
FACSIMILE: (949) 975-0514
REICHRADCLIFFE.COM

PARTNERS
MARC G. REICH
RICHARD J. RADCLIFFE
ADAM T. HOOVER

FIRM PROFILE

Marc G. Reich founded the practice on January 1, 1999. That practice has grown into Reich Radcliffe & Hoover LLP, an innovative law firm that has established a network of attorneys and affiliated law firms to meet the civil litigation and business law needs of its clients. Because of the firm's resources, it can expand or contract to efficiently meet the needs of a particular case or matter, without unnecessary overhead expenses. It is committed to providing high quality, responsive and efficient legal services. The firm is currently litigating several cases with amounts in dispute in the tens of millions of dollars. The firm has received an AV rating from Martindale-Hubbell. Martindale-Hubbell is a legal directory service that has been in existence for more than 133 years and currently maintains a database of over one million lawyers and law firms in 160 countries. The AV rating is Martindale-Hubbell's highest rating and is reserved for firms with very high to preeminent legal ability, and professional and ethical standards.

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Adam T. Hoover

Adam joined the firm in 2005 after graduating from Texas Tech School of Law. Adam was a member of the Texas Tech Law Review, where he served as Manuscript Editor in 2003 and Technology Editor in 2004. In 2005, Adam published a Law Review article on FCC telecommunication rule-making procedures. Since joining the firm in 2006, Adam has litigated disputes in business contracts, real estate, commercial debt collection and employment law. Adam has been involved in four trials and has made appellate arguments before the Second District Court of Appeal. Adam frequently represents credit card processing companies and has litigated over twenty disputes on their behalf.

Adam also assists clients with their transactional needs, including copyright and trademark filings, corporate transactions, employment contracts and compliance research. Adam is a member of the Litigation Section of the State Bar of California and the Business Litigation Section of the Orange County Bar Association.

EXHIBIT B

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

Firm Name: Reich Radcliffe & Hoover LLP **Reporting Period: March 1, 2017 through April 1, 2019**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Marc G. Reich (P)									3.80						3.80	$750.00	$2,850.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.80**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.80**		**$2,850.00**
NON-ATTORNEYS																	
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.80**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.80**		**$2,850.00**

EXHIBIT C

Selection Criteria

Slip.Classification	□pen
Slip.Date	3/1/2017 - 3/31/2019
Clie.Selection	Include: Class/LithiumIonBatteries

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Client: Class/LithiumIonBatteries					
51211 4/12/2017 WIP	TIME 8:48 PM	MGR BC9 Class/LithiumIonBatteries	0.70	675.00	472.50
Draft email to Kathryn P. Hoek re [redacted] in □rder Denying Motion for Class Cert re: [redacted] (docket no 1735).					
51670 5/22/2017 WIP	TIME 2:06 PM	MGR BC9 Class/LithiumIonBatteries	1.40	675.00	945.00
Review and revise Pham incentive fee decl. .7 Draft email to lead counsel re [redacted] .2. Telephone call with Pham re [redacted]. .2. Review and respond to email from Pham re same. .1 Review email from lead counsel re [redacted]. .1 Draft email to lead counsel attaching [redacted]. .1					
51679 5/24/2017 WIP	TIME 12:51 PM	MGR BC9 Class/LithiumIonBatteries	0.20	675.00	135.00
Review email from Jennie re [redacted]. .1 Draft email to Pham re same. .1					
51680 5/24/2017 WIP	TIME 12:59 PM	MGR BC9 Class/LithiumIonBatteries	0.20	675.00	135.00
Review draft update letter for class reps. .1. Draft email to Jennie with my suggested revisions. .1					
51710 5/28/2017 WIP	TIME	MGR BC9 Class/LithiumIonBatteries	0.30	675.00	202.50
Draft email to lead counsel re [redacted].					
53957 7/24/2018 WIP	TIME 11:07 AM	MGR BC9 Class/LithiumIonBatteries	0.40	725.00	290.00
Exchange emails with Tom Pham re [redacted]. .2 Telephone call with Tom Pham re [redacted]. .2					
54637 11/17/2018 WIP	TIME	MGR BC9 Class/LithiumIonBatteries	0.60	725.00	435.00
Draft email to Tom re [redacted]. .3 Telephone call with Tom re [redacted] .3					

Slip ID / Dates and Time / Status / Description	Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Total: Class/LithiumIonBatteries				
	Billable	3.80		2615.00
	Unbillable	0.00		0.00
	Total	3.80		2615.00
Grand Total				
	Billable	3.80		2615.00
	Unbillable	0.00		0.00
	Total	3.80		2615.00

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
Reich Radcliffe & Hoover LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	151.41
TOTAL:	$151.41

EXHIBIT 51

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF MARC G. REICH IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF REICH RADCLIFFE & HOOVER LLP**

I, Marc G. Reich, declare:

1. I am partner of Reich Radcliffe & Hoover LLP, FKA Reich Radcliffe & Kuttler LLP, ("RRH"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representative Tom Pham and as counsel for IPPs throughout the course of this litigation. The background and experience of RRH and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, RRH performed the following work: Updated Mr. Pham on the status of and developments in the case and responded to his questions; obtained and organized documents and information from Mr. Pham relating to his purchases of lithium ion batteries and products; drafted and revised discovery responses for Mr. Pham and organized his document production; and prepared Mr. Pham for and defended his deposition.

5. Attached hereto as **Exhibit B** is a billing summary of RRH's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by RRH during this period of time was 96.8, with a corresponding lodestar based on current rates of $55,935.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by RRH.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses RRH has incurred during the course of this litigation. RRH expended a total of $151.41 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by RRH on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at Newport Beach, CA.

/s/ Marc G. Reich

Marc G. Reich

ATTESTATION

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

By: */s/ Steven N. Williams*
Steven N. Williams

EXHIBIT A

REICH RADCLIFFE & HOOVER

L•L•P

ATTORNEYS AT LAW
4675 MACARTHUR COURT, SUITE 550
NEWPORT BEACH, CALIFORNIA 92660
TELEPHONE: (949) 975-0512
FACSIMILE: (949) 975-0514
REICHRADCLIFFE.COM

PARTNERS
MARC G. REICH
RICHARD J. RADCLIFFE
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OF COUNSEL
MATTHEW R. SEIFEN
BYRON S. AHN

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Estate Broker's License (inactive).

Adam T. Hoover

Adam joined the firm in 2005 after graduating from Texas Tech School of Law. Adam was a member of the Texas Tech Law Review, where he served as Manuscript Editor in 2003 and Technology Editor in 2004. In 2005, Adam published a Law Review article on FCC telecommunication rule-making procedures. Since joining the firm in 2006, Adam has litigated disputes in business contracts, real estate, commercial debt collection and employment law. Adam has been involved in four trials and has made appellate arguments before the Second District Court of Appeal. Adam frequently represents credit card processing companies and has litigated over twenty disputes on their behalf.

Adam also assists clients with their transactional needs, including copyright and trademark filings, corporate transactions, employment contracts and compliance research. Adam is a member of the Litigation Section of the State Bar of California and the Business Litigation Section of the Orange County Bar Association.

Matthew R. Seifen

Matt is Of Counsel to the firm. Matt has been practicing law in the State of California since 1997. He is licensed to practice before all State Courts in California, as well as in the Southern and Central District Federal Courts in California. His practice is focused upon handling litigation matters, most of which involve business, real estate or construction disputes. Matt has litigated numerous cases and taken several cases through trial and arbitration. He has also argued cases before the Second District Court of Appeal.

Matt graduated from the University of San Diego, School of Law in 1997 where he was awarded the Order of Barristers and was a National Team Member of the Law School's Appellate Moot Court Board.

Matt is a member of the Orange County Bar Association and a member of the Business Litigation Section of the Orange County Bar Association.

Byron S. Ahn

Byron is Of Counsel to the firm. Byron is a 2012 graduate of the University of California Davis School of Law. Byron was an editor for the UC Davis Law Review, where he served as Associate Articles Editor in 2012. Byron also created and co-taught a seminar on the laws and regulations related to the gaming industry. Byron is involved with all of the firm's litigation matters, including disputes in business contracts, employment, and antitrust law.

Byron is a sports enthusiast and loves rooting for his two favorite teams, the UCLA Bruins and the SF Giants. Byron is active in his community and a member of the Los Angeles County Bar Association.

EXHIBIT B

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

Firm Name: Reich Radcliffe & Hoover LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Marc Reich (P)	1.90		22.70		37.70				13.60						75.90	$675.00	$51,232.50
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**1.90**	**0.00**	**22.70**	**0.00**	**37.70**	**0.00**	**0.00**	**0.00**	**13.60**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**75.90**		**$51,232.50**
NON-ATTORNEYS																	
Janna Choi			13.9		6.10				0.90						20.90	$225.00	$4,702.50
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**13.90**	**0.00**	**6.10**	**0.00**	**0.00**	**0.00**	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**20.90**		**$4,702.50**
GRAND TOTAL:	**1.90**	**0.00**	**36.60**	**0.00**	**43.80**	**0.00**	**0.00**	**0.00**	**14.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**96.80**		**$55,935.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Reich Radcliff & Hoover LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Marc Reich (P)	Before 2015	$575
Marc Reich (P)	1/1/15 through 6/30/16	$625
Marc Reich (P)	7/1/16 through present	$675
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Janna Choi (PL)	Before 3/30/16	$175
Janna Choi (PL)	4/1/16 through present	$225

EXHIBIT D

(REDACTED)

Selection Criteria

Slip.Classification	Open
Slip.Slip Type	Time
Slip.Date	7/1/2013 - 2/28/2017
Clie.Selection	Include: Class/LithiumIonBatteries

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
51389 7/1/2013 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	1.80	575.00	1035.00
Telephone call with [redacted] 1AC. (.1) Review 1AC. (1.2) [redacted]. (.1) Telephone call with [redacted] (.3) Draft email to lead counsel confirming accuracy of info in complaint pertaining to [redacted] (.1)					
41047 7/1/2013 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	1.70	575.00	977.50
Review prot order. (.4) Draft email to [redacted] (.1) Sev telephone calls with Chris Le re: same. (.2) Review protective order with client. (.8) Review his executed and completed exh. A. (.1) Draft email to lead counsel attaching same. (.1)					
43622 4/14/2014 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	1.00	575.00	575.00
Review amended complaint filed on 4/11. (.9) Draft email to client [redacted] attaching same. (.1)					
45045 9/20/2014 WIP	TIME 5:31 PM	MGR BC1 Class/LithiumIonBatteri	1.20	575.00	690.00
Review letter from Williams requesting additional info fr [redacted]. (.1) Review file for info we already have for [redacted] (1.0) Draft email to [redacted] requesting any additional info. (.1)					
45064 9/29/2014 WIP	TIME 6:52 AM	MGR BC1 Class/LithiumIonBatteri	0.70	575.00	402.50
Review preservation decl received back from [redacted]. (.1) Draft email to him to confirm that he has no other docs relating to his battery purchases other than the docs we already provided to lead counsel. (.2) Review and respond to email from him re same. (.2) Draft email to Lasha Garcia and Jaclyn Verducci (CPM firm) re same. (.2)					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
45080 10/2/2014 WIP	TIME 3:30 PM	MGR BC9 Class/LithiumIonBatteri	1.50	575.00	862.50
Review doc no. 512 - □rder on Motions to Dismiss. (1.3) Draft email to [redacted] attaching same. (.2)					
45239 10/22/2014 WIP	TIME 7:06 PM	MGR BC9 Class/LithiumIonBatteri	0.80	575.00	460.00
Quickly review 3 AC. (.6) Draft email to Steve Williams re omission of one of [redacted] purchases. (.2)					
46233 4/28/2015 WIP	TIME 10:53 AM	MGR BC3 Class/LithiumIonBatteri	1.40	625.00	875.00
Review Rog Set 1 to IPPs and RPPs Set 1 to IPPs. (.4) [redacted] (.8) [redacted] (.2)					
46237 4/28/2015 WIP	TIME 5:01 PM	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Review and respond to email from [redacted] re his availability for a conf call re discovery responses and re discovery process.					
46238 4/28/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
[redacted]					
46243 4/29/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Carla Voigt re conf call with [redacted]					
46245 5/1/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.40	625.00	875.00
[redacted] Dave Young, Alicia Guttierrez and Carla Voigt [redacted]					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
46733 5/5/2015 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	2.10	175.00	367.50
Meeting with M. Reich and [redacted] re documents and responses to discovery requests.					
46251 5/5/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	2.10	625.00	1312.50
Travel to and from Irvine Spectrum to meet with [redacted] and JC for lunch to discuss how JC can help in locating docs responsive to doc requests. Spent .7 hours traveling and 1.4 hours at lunch meeting.					
46776 5/6/2015 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	1.50	175.00	262.50
Review operative complaint, outstanding discovery requests and docs and info we have obtained from [redacted] to date.					
46257 5/6/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Telephone call from Carla Voigt re time table for providing additional docs and info for [redacted]					
46256 5/6/2015 WIP	TIME 2:20 PM	MGR BC3 Class/LithiumIonBatteri	0.70	625.00	437.50
Draft email to JC re: case background and attaching operative complaint, outstanding discovery requests and docs and info we have obtained from [redacted] to date.					
46255 5/6/2015 WIP	TIME 2:03 PM	MGR BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Carla Voigt re status of [redacted] document collection.					
46734 5/7/2015 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	3.90	175.00	682.50
Review email from M. Reich and Carla Voigt re requested items (.2) Prepare chart reflecting request for same (.5) ; Draft email to [redacted] re chart (.2); begin reviewing the documents and websites for responsive information (2.1); [redacted]					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
(.9).					
46259 5/7/2015 WIP	TIME 10:21 AM	MGR BC3 Class/LithiumIonBatteri	0.60	625.00	375.00
Review spreadsheet created by JC to track info responsive to discovery requests. (.2) Compare it to list of additional info needed contained in yesterday's email from Carla. (.1) [redacted] (.2) Draft email to Janna and Tom re same. (.1)					
46266 5/7/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Draft email to JC containing distribution list of attys who should receive [redacted] info.					
46735 5/8/2015 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	0.40	175.00	70.00
Draft email to counsel re forwarding photos responsive to the request and corresponding chart reflecting responses to the discovery request (.2); Review email from and call from M. Reich re same (.2).					
46270 5/8/2015 WIP	TIME 12:31 PM	MGR BC3 Class/LithiumIonBatteri	1.10	625.00	687.50
Telephone call with Carla re status of [redacted] info. (.2) Several calls with Janna re same. (.4) Review spreadsheet prepared by Janna. (.3) Review additional docs obtained from [redacted] (.2)					
46385 5/11/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.90	625.00	1187.50
[redacted]					
46384 5/11/2015 WIP	TIME 12:37 PM	MGR BC3 Class/LithiumIonBatteri	1.10	625.00	687.50
Telephone call with David Young re [redacted] availability to sign a verification (.1). Review draft response for [redacted] to Sp. Rogs (.4).					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Telephone call with David Young re my suggested changes to response (.3). [redacted] (.3).					
46387 5/12/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Draft email to David Young requesting service copies of [redacted] discovery responses (.1). Review final versions of discovery responses (.2).					
47182 9/15/2015 WIP	TIME 10:30 AM	MGR BC3 Class/LithiumIonBatteri	0.40	625.00	250.00
Review and respond to email from Carla Voigt re need for Pham to search is computer (.1). [redacted] (.1). [redacted] (.1). Several calls with Carla to arrange time for conf call with Pham (.1).					
47191 9/18/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Carla re call with Tom on Monday.					
47197 9/21/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Carla Voigt re today's conference call.					
47619 11/11/2015 WIP	TIME 9:05 AM	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Review response to 2nd set of rogs (.2) [redacted] (.1).					
47628 11/12/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
[redacted]					
47629 11/13/2015 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Review and respond to email from Carla Voigt re status of [redacted] verification. (.1) [redacted]. (.05) Review verification received from [redacted] (.05) Draft email to Voigt attaching same. (.05).					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
47890 1/22/2016 WIP	TIME 11:53 AM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Carla [redacted] depo. (.1) Draft email to Pham re same. (.1)					
48671 1/24/2016 WIP	TIME	Janna Choi BC9 Class/LithiumIonBatteri	0.90	175.00	157.50
Review email from M. Reich re Fourth Amended Complaint (.1). Quickly review same (.8).					
47892 1/24/2016 WIP	TIME 2:02 PM	MGR BC9 Class/LithiumIonBatteri	0.90	625.00	562.50
Quickly review IPP motion for class cert. (.6) [redacted] (.1)					
47891 1/24/2016 WIP	TIME 2:02 PM	MGR BC5 Class/LithiumIonBatteri	0.70	625.00	437.50
Review email from [redacted] re his availability for depo and depo prep. (.1) Several telephone calls with Tom re same and about deposition process. (.6)					
47927 1/27/2016 WIP	TIME 8:09 AM	MGR BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
Draft email to Voigt re availability for depo					
47968 2/2/2016 WIP	TIME 7:20 PM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Voigt re Pham depo availability in late Feb and March (.1). [redacted] (.1).					
48673 2/5/2016 WIP	TIME	Janna Choi BC5 Class/LithiumIonBatteri	0.20	175.00	35.00
Review email to and from Carla Voigt and [redacted] re deposition scheduling.					
47971 2/7/2016 WIP	TIME 10:25 AM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Phone call with [redacted] re his depo availability.					
47972 2/8/2016 WIP	TIME 10:26 AM	MGR BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
Compare Pham depo availability with my calendar. Draft email to Voigt re same.					
47982 2/10/2016 WIP	TIME 2:36 PM	MGR BC5 Class/LithiumIonBatteri	0.50	625.00	312.50
Review email from Voigt from yesterday re probable date for [redacted] depo and related matters (.1). [redacted] (.1). Quickly review protective order (.2). Draft email to Voigt re same (.1).					
47985 2/11/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Voigt confirming 3/16 as date for Pham depo.					
48688 3/1/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	1.20	175.00	210.00
Review emails from M. Reich re [redacted] discovery responses (.2); review email from M. Reich re [redacted] deposition schedule (.1). Review files for docs [redacted] provided to firm and compare them to doc produced for him (.9).					
48146 3/1/2016 WIP	TIME 1:43 PM	MGR BC5 Class/LithiumIonBatteri	1.70	625.00	1062.50
Review email from Voigt requesting confirmation about docs in [redacted] (.1). Telephone call with Voigt re review our spreadsheet of applicable Pham purchases and our rog responses for [redacted] and to discuss what type of docs RFP 7 and 9 requests and whether docs [redacted] created for personal or business use would be responsive (.4). Telephone call with [redacted] re same and dates and times for his prep sessions, to confirm we have all his battery related docs and to do some depo prep (.9). Draft several emails to Voigt re same (.3).					
48172 3/4/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Review and respond to email from Kathy Hoek re rescheduling time for telephonic depo prep (.1). Telephone call with Tom re same (.1).					
48179 3/7/2016 WIP	TIME 9:21 PM	MGR BC5 Class/LithiumIonBatteri	1.80	625.00	1125.00
Prepare for tomorrow's dep prep session with Pham (1). Review and respond to email from Krysta Kauble Pachman re complying with protective order (.2). Review and respond to email from Kathryn Hoek re Pham's email search (.3). Review and respond to email from Kathryn Hoek re payment records for Pham's purchases (.3).					
48690 3/8/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	0.50	175.00	87.50
Review email from Carla Voigt re follow-up and additional Tom Pham document production, discovery responses (.2); call with M. Reich re same (.3).					
48407 3/8/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	0.90	175.00	157.50
Review series of emails from counsel regarding deposition, documents and discovery responses for Tom Pham (.3); call with M. Reich regarding obtaining Dell Financial invoices and records for Tom Pham; review files for Dell account information for Tom Pham (.2). Contact Dell re same (.4).					
51390 3/8/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.30	625.00	812.50
Review and respond to email from Hoek re whether Pham took tax deductions for his battery related purchases. (.2) Review draft Supp Rog Responses for Tom Pham. (.3) Draft email to Hoek re changes to consider to it. (.2) Review Pham's responses to doc demands (.4). Draft email to Krysta Pachman that we have provided all responsive docs to lead counsel. (.2)					
48180 3/8/2016 WIP	TIME 12:14 PM	MGR BC5 Class/LithiumIonBatteri	2.90	625.00	1812.50
Telephone call with Pham in advance of telephonic depo prep call. (.3) Telephone call with Kathy Hoek in advance of telephonic depo prep call. (.2) Participate in telephonic depo prep call. (1.1) Telephone call with Pham to supervise search of terms in his email acct (this was a separate call from the telephonic depo prep call). (.5) Review file for documents Pham provided to us. (.6) Draft email to Hoek re same. (.2)					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
48185 3/8/2016 WIP	TIME 8:29 PM	MGR BC5 Class/LithiumIonBatteri	0.30	625.00	187.50
Review papers IS of IPP request to amend complaint (.2). Review docket no. 1138 Defendants' List of Deficiencies in IPPs' Demonstrative (.1). In particular, look for any references to [redacted]					
48186 3/8/2016 WIP	TIME 8:39 PM	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Review email from Krysta Pachman re: why we are leaving [redacted] game controller purchases in suppl rog respond (1). Review and revise [redacted] verification (.1). [redacted]. (.1)					
48190 3/9/2016 WIP	TIME 3:23 PM	MGR BC5 Class/LithiumIonBatteri	0.40	625.00	250.00
Review and respond to email from Hoek re change in [redacted] depo starting time and location. (.1) Review and respond to email from [redacted] re same. (.1) [redacted]. (.2)					
48191 3/10/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Hoek re change in [redacted] depo to 9;30 a.m.					
48195 3/14/2016 WIP	TIME 11:51 AM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Hoek re obtaining [redacted] verification to amended rog resp (.1). Review and respond to email for [redacted] re same (.05). Telephone call with [redacted] re same (.05).					
48194 3/14/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.40	625.00	250.00
[redacted] (.2). Update notes for prep of [redacted] accordingly (.2).					
48196 3/14/2016 WIP	TIME 12:05 PM	MGR BC3 Class/LithiumIonBatteri	1.40	625.00	875.00

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
Review email from Krysta Pachman re: amended RFP responses and need to get verifications from [redacted] Review draft responses and verifications. (.6) Exchange several emails with [redacted] re same. (.3) Draft email to Krysta re same. (.1) Review and respond to email from Hoek re same. (.2) Review and respond to email from Hoek re amended depo notice to [redacted]. (.1) Call with Demetrius Lambrinos re obtaining Toshiba doc demands. (.1)					
48197 3/14/2016 WIP	TIME 2:25 PM	MGR BC5 Class/LithiumIonBatteri	6.90	625.00	4312.50
Prepare for tomorrow's dep prep session with [redacted], including reviewing 4th amended complaint, reviewing and highlighting key questions from 165 page depo transcript of [redacted] and 304 page depo tr. of [redacted] and updating depo prep outline.					
48737 3/15/2016 WIP	TIME	Janna Choi BC5 Class/LithiumIonBatteri	2.20	175.00	385.00
Attend portions of dep prep session with [redacted]					
48198 3/15/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	5.80	625.00	3625.00
[redacted]					
48199 3/16/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	10.90	625.00	6812.50
Travel to from Rancho Santa Margarita to Huntington Beach to pick up [redacted] (.1.1). . Travel from HB to LA (.1.3) Defend [redacted] at deposition (6). Travel back to [redacted] to drop [redacted] off at his house (1.5). Travel fro[redacted] back to Rancho Santa Marg. (1)					
48206 3/19/2016 WIP	TIME 12:02 PM	MGR BC9 Class/LithiumIonBatteri	0.90	625.00	562.50
[redacted]					
48205 3/19/2016 WIP	TIME 11:53 AM	MGR BC9 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email form Colleen Cleary [redacted] Pointed out error in par 396 of 4 AC.					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
48693 3/21/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	1.20	175.00	210.00
Call from M. Reich re conference call for [redacted] documents; participate in conference call re native format for photos; review further email from Demetrius Lambrinos re same.					
48210 3/21/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.20	625.00	750.00
Conf call with Demitrius, Supreet Singh, Thomas Matzen and [redacted] re metadata in Pham doc production.					
48212 3/21/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and revise Hoek summary of [redacted] depo.					
48209 3/21/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.40	625.00	250.00
[redacted] (.1). [redacted] (.1). Call with Demetrius re same (.1). Draft email to Demetrius re same (.1).					
48208 3/21/2016 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	0.40	625.00	250.00
[redacted]					
48207 3/21/2016 WIP	TIME 9:16 AM	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Colleen Cleary re [redacted]					
48694 3/22/2016 WIP	TIME	Janna Choi BC5 Class/LithiumIonBatteri	3.70	175.00	647.50
Review additional emails from Supreet Singh re native production (.3); review files for photos and production (2.9); review and respond to several emails re same and re procedure (.5)					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
48214 3/22/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.50	625.00	312.50
Review rough version of [redacted] depo tr (.4). Draft email to him attaching same (.1).					
48213 3/22/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.30	625.00	187.50
Exchange texts and emails with JC re providing native versions of [redacted] docs.					
48695 3/23/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	0.60	175.00	105.00
Review email from Supreet Signh re issues with photo production (.2) call with Supreet Signh to resolve same(.4).					
48697 3/25/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	1.40	175.00	245.00
Review email from Supreet Signh re continuing problems with phote produciton (.2); further review and convert native file (1.0); draft email to Supreet Signh re status (.2).					
48223 3/29/2016 WIP	TIME 3:09 PM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to email from Hoek re preparing errata to [redacted] depo.					
48236 3/31/2016 WIP	TIME 6:47 PM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Draft email to [redacted] re correcting his depo tr.					
48230 3/31/2016 WIP	TIME 3:59 PM	MGR BC3 Class/LithiumIonBatteri	0.60	625.00	375.00
[redacted] (.1). (.05). (..05). (.1). (.1). [redacted] (.1). Draft email to Demetrius re same (.1).					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
48698 4/1/2016 WIP	TIME	Janna Choi BC3 Class/LithiumIonBatteri	0.20	225.00	45.00
Review emails from Demetrius Lambrinos, M. Reich and B. Kim re [redacted]					
48247 4/6/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.60	625.00	1000.00
Draft email to [redacted] remind him of today's conf call (.1). Prepare for call (.2). [redacted]					
48269 4/9/2016 WIP	TIME 3:18 PM	MGR BC9 Class/LithiumIonBatteri	0.40	625.00	250.00
[redacted]					
48281 4/12/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.10	625.00	62.50
Review and respond to email from Demetrius X. Lambrinos re draft responses to the Defendants Third Set of Interrogatories					
48599 4/21/2016 WIP	TIME 6:26 AM	MGR BC3 Class/LithiumIonBatteri	0.50	625.00	312.50
Review Ds 3rd set of Rogs (.1). Review draft responses for [redacted] (.1). Review and revise his decl (.1). Draft email to him re same (.1). [redacted]					
48606 4/22/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.40	625.00	250.00
Review email from Lead Counsel re: [redacted] providing wrong verification (.1). Draft email to Pham re same (.1). Draft email to lead counsel re same (.1). Telephone call with Demetrious re same (.1).					
48614 4/24/2016 WIP	TIME 8:12 PM	MGR BC5 Class/LithiumIonBatteri	2.10	625.00	1312.50
Review [redacted] depo tr (2.0). Draft email to lead counsel re same (.1).					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
48730 4/25/2016 WIP	TIME 9:47 PM	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
Review email form Krysta Pachmen requesting Errata sheet even though we will have no changes (.1) Draft email to [redacted] re same (.1).					
48734 4/26/2016 WIP	TIME	MGR BC5 Class/LithiumIonBatteri	0.20	625.00	125.00
[redacted] Review Errata Sheet (.05). [redacted]					
49273 6/21/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	1.20	625.00	750.00
Review email from Michael Caylao requesting that we obtain [redacted] replacement battery (.1). Review case file re: whether my firm or [redacted] has the battery (.4). Review [redacted] depo tr re: whereabouts of the battery (.5). Draft email to Mike re same (.2).					
49286 6/28/2016 WIP	TIME	MGR BC3 Class/LithiumIonBatteri	0.20	625.00	125.00
Review and respond to 6/24/16 email from Michael Caylao re whether [redacted] can access replacement battery.					
50361 11/22/2016 WIP	TIME 11:42 AM	MGR BC9 Class/LithiumIonBatteri	1.20	675.00	810.00
[redacted] (.3). [redacted] (.2).					
50402 12/7/2016 WIP	TIME 7:34 AM	MGR BC9 Class/LithiumIonBatteri	0.40	675.00	270.00
[redacted]					
50444 12/19/2016 WIP	TIME 4:42 PM	MGR BC9 Class/LithiumIonBatteri	0.90	675.00	607.50
[redacted]					

Slip ID / Dates and Time / Status / Description		Timekeeper / Activity / Client / Reference	Units	Rate	Slip Value
50557 12/20/2016 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	0.50	675.00	337.50
[redacted]					
50558 12/21/2016 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	0.10	675.00	67.50
[redacted]					
50592 1/4/2017 WIP	TIME 10:27 PM	MGR BC9 Class/LithiumIonBatteri	0.40	675.00	270.00
[redacted]					
50597 1/5/2017 WIP	TIME	MGR BC9 Class/LithiumIonBatteri	0.10	675.00	67.50
[redacted]					
50699 1/24/2017 WIP	TIME 6:27 PM	MGR BC9 Class/LithiumIonBatteri	0.40	675.00	270.00
Review Papers Filed IS Mot For Prelim Approv of Sett with Hitachi and Maxell					
Grand Total		Billable	96.80		50870.00
		Unbillable	0.00		0.00
		Total	96.80		50870.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
Reich Radcliffe & Hoover LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	$151.41
TOTAL:	$151.41

EXHIBIT 52

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF STEVE CIKES IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF RENNE PUBLIC LAW GROUP AND SLOAN SAKAI YEUNG & WONG LLP**

I, Steve Cikes, declare:

1. I am a partner with the law firm Sloan Sakai Yeung & Wong LLP ("SSYW). SSYW, along with Louise H. Renne of the Renne Public Law Group ("RPLG"), serve as Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action.[1] I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. SSYW and RPLG have served as counsel to government subclass representatives the City of Palo Alto and the City of Richmond and as counsel for IPPs throughout the course of this litigation. The background and experience of SSYW and RPLG and their attorneys are summarized in the CVs attached hereto as **Exhibit A**.

3. SSYW and RPLG have prosecuted this litigation solely on a contingent-fee basis and have been at risk that it would not receive any compensation for prosecuting claims against the defendants. While SSYW and RPLG have devoted their time and resources to this matter, they have foregone other legal work for which they would have been compensated.

4. During the pendency of the litigation, SSYW and RPLG performed the following work: (a) conferring with Lead Counsel concerning issues related to the governmental subclass; (b) review and drafting of pleadings related to the governmental subclass; (c) conferring with representatives from the City of Palo Alto and the City of Richmond concerning case developments and discovery-related issues, including the development and implementation of document retention protocols; (d) preparing responses on behalf of the City of Palo Alto and the City of Richmond to Defendants' written discovery; (e) assisting in the collection, review, and

[1] Ms. Renne was previously a partner with SSYW, when the firm was known as Renne Sloan Holtzman Sakai LLP ("RSHS"). RSHS was renamed SSYW effective March 1, 2018, when Ms. Renne left the firm to form RPLG. A notice reflecting this change – along with Ms. Renne's continuation as counsel – was filed with this Court on June 14, 2018 (ECF No. 2341).

production of documents by the City of Palo Alto and the City of Richmond in response to Defendants' discovery demands; and (f) preparing for and attending Defendants' FRCP 30(b)(6) depositions of the City of Palo Alto and the City of Richmond.

5. Attached hereto as **Exhibit B** is a billing summary of SSYW's and RPLG's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by SSYW and RPLG. Attached hereto as **Exhibit C** is a compilation of both firms' detailed time records at historical billing rates. The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at SSYW and RPLG.

6. A summary of work performed by SSYW (then known as RSHS) and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Steve Cikes in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Renne Sloan Holtzman Sakai LLP and filed on May 26, 2017. (ECF No. 1813-32.) Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by SSYW and RPLG since June 1, 2013 was 299.40, with a corresponding lodestar of $130,599.50 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses SSYW and RPLG have incurred from June 1, 2013 to present, plus applicable case filing fees. SSYW and RPLG expended a total of $482.53 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by SSYW and RPLG on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by SSYW and RPLG in this case which are included in this declaration, and I affirm that they are true

and accurate.

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

Executed on April 11, 2019 at Berkeley, California.

/s/ Steve Cikes

Steve Cikes

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

RPLG
Renne Public Law Group®



Louise Renne
Partner

415.848.7240

lrenne@publiclawgroup.com
350 Sansome St., Suite 300
San Francisco, CA 94104

Practice Areas
Litigation
Public Interest

Bar Admission
California

District of Columbia

Education
Columbia University School of Law, JD

Michigan State University, BA

Louise Renne

EXPERIENCE

Louise Renne is a founding partner of Renne Public Law Group, and was previously a founding partner of Renne Sloan Holtzman Sakai Public Law Group. She leads the firm's public interest litigation and elder financial abuse practices. Ms. Renne pioneered the model of public interest plaintiff coalitions comprised of government agencies, individuals, and non-profit organizations during her 16-year tenure as San Francisco City Attorney. She is known for transforming the traditionally defense-oriented practice of municipal law by creating an affirmative litigation program that won significant victories for cities and counties in California. As a nationally recognized and respected leader in municipal law, she often testifies before federal, state, and other governmental bodies. She is also frequently requested to conduct impartial investigations for local public agencies in high-profile cases.

Some of the public interest cases Ms. Renne has directed include:

- A certified national class action involving 250,000 victims, national and state putative class actions, and individual lawsuits involving elder financial abuse. These suits were brought on behalf of senior citizens against insurance companies, banks, and other entities for the sale of inappropriate annuity products to seniors.
- A lawsuit on behalf of African American employees in private industry for race discrimination, retaliation, and harassment.
- Numerous class-action suits brought on behalf of local public agencies against energy producers, tobacco companies, national banks, gun manufacturers, auto insurers and escrow companies.

RELATED EXPERIENCE

Ms. Renne previously served for 16 years as the elected City Attorney for the City and County of San Francisco. As City Attorney she was responsible for providing legal expertise and services to more than 60 operating departments and commissions, each tasked with providing essential government services. She modernized the City Attorney's office, establishing it as a national leader in the practice of public law by creating a vigorous and enterprising 200-lawyer legal department of highly-skilled litigators, negotiators, and advisory attorneys. She energized and streamlined the Office's advice function, building widely respected legal expertise in every area of municipal operations, ranging from traditional fields such as land use and public safety to the cutting-edge areas of energy regulation and telecommunications.

Ms. Renne also served as General Counsel for the San Francisco Unified School District where she led the effort to combat corruption existing at the time and established an in-house legal department, and as the City Attorney for the City of Richmond.

RPLG
Renne Public Law Group®



Louise Renne
Partner

Her prior experience includes:

- Member of the San Francisco Board of Supervisors for 8 years, where she was chair of the Finance Committee.
- California Deputy Attorney General for 11 years. She served in the environmental and criminal divisions, and argued on behalf of the state before the California Supreme Court and the United States Supreme Court.
- Worked in private practice for 2 years.
- Staff attorney in the General Counsel's Office at the Federal Communications Commission for 3 years.

COMMUNITY ACTIVITIES

- Allies United for Children, Chair, Board of Directors
- San Francisco Fine Arts Museums, former member, Board of Directors
- San Francisco Police Commission, former President
- Volunteers of Laguna Honda Hospital, former member, Board of Directors
- American Cancer Society, San Francisco Chapter, former member, Board of Directors
- Friends of the Children, San Francisco Chapter, former Chair, Board of Directors
- PGA's First Tee program, former member, Board of Directors
- California Regional Water Quality Control Board, former member
- Golden Gate Bridge District, former member, Board of Directors
- California Women Lawyers, former President

STEVE CIKES

Steve Cikes

Partner

t: 415.678.3810 (tel:415.678.3810)

scikes@sloansakai.com (mailto:scikes@sloansakai.com)

Experience

Mr. Cikes joined the firm in 2005. His practice is focused primarily on representing and advising public agencies and non-profit organizations on labor, employment and government law matters. He also represents the firm's clients in affirmative, public interest litigation – including, for example, severing a counsel for representatives of a municipal entity subclass in *In Re Lithium Ion Batteries Antitrust Litig*. Mr. Cikes has extensive litigation experience, having handled a variety of cases before state and federal courts, administrative tribunals and arbitrators. He has successfully litigated cases involving claims under the Fair Labor Standards Act, 42 U.S.C. § 1983, Title VII and California's Fair Employment and Housing Act. He also has significant experience dealing with traditional and administrative writs of mandate, federal/state preemption issues, fiscal emergencies and the vesting of public employee pension and retiree medical benefits.

Related Experience

During law school, Mr. Cikes served as a judicial extern for United States District Court Judge William H. Alsup (Northern District of California), a law clerk for the United States Attorney's Office, Criminal Division in San Francisco, and an editor of the law review.

Representative Published Decisions

- *City of El Centro v. Lanier*, 245 Cal.App.4th 1494 (2016)

- *County of San Luis Obispo v. San Luis Obispo Government Attorneys' Union*, PERB Decision No. 2427-M (2015)
- *Epstein v. Superior Court*, 193 Cal.App.4th 1405 (2011)
- *Retired Employees Assn. of Orange County, Inc. v. County of Orange*, 52 Cal.4th 1170 (2011)
- *International Assn. of Fire Fighters, Local 188 v. Public Employment Relations Bd.*, 51 Cal.4th 259 (2011)
- *County of Sonoma v. Superior Court*, 173 Cal.App.4th 322 (2009)
- *U.S. Western Falun Dafa Assn. v. Chinese Chamber of Commerce*, 163 Cal.App.4th 590 (2008)
- *Martin v. City of Richmond*, 504 F.Supp.2d 766 (N.D. Cal. 2007)

Selected Articles and Presentations

- Co-Author, *"Labor and Employment Voter Initiatives: Legal Pitfalls and Hurdles in Seeking Reform at the Ballot Box,"* A Public Law Group White Paper (September 2015)
- Co-Author, *"Can the State Use its Spending Powers to Circumvent Charter Cities' Home Rule Authority?,"* California Public Law Journal, Vol. 38, No. 2 (Summer 2015)
- Panelist, *"Post-Employment Benefits: Vesting, Impairment, and Bankruptcy,"* California State Bar – Labor & Employment Section, 19th Annual Public Sector Conference (May 2013)
- Co-Author, *"Declarations of Fiscal Emergency: A Resurging Option for Public Entities Attempting to Deal With the Current Economic Climate,"*California Public Law Journal, Vol. 34, No. 1 (Winter 2011)

Awards and Honors

- Named "Rising Star" by *Northern California Super Lawyers and San Francisco Magazine* – 2013, 2014
- Graduated Law School with Highest Honors (Top 5%)
- Editor, *Golden Gate University Law Review*
- Recipient, *The Helen A. and John A. Garfield Endowed Scholarship*
- Recipient, *CALI Award – Civil Procedure II*

- Recipient, *Witkin Award – Professional Responsibility*
- Recipient, *Witkin Award – Writing and Research II*



in (https://www.linkedin.com/company/renne-sloan-holtzman-sakai/)
(http://www.publiclawgroup.com/feed/rss/)

PHONE: (916) 258-8800 (TEL:(916) 258-8800) FAX: (916) 258-8801

info@sloansakai.com (mailto:info@sloansakai.com)
555 Capitol Mall, Suite 600, Sacramento, CA, 95814.
1220 7th Street, 3rd Floor, Berkeley, CA, 94710.

Webmail (https://portal.office.com/)

EXHIBIT B

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

Firm Name: Renne Public Law Group and Sloan Sakai Yeung & Wong LLP **Reporting Period: March 1, 2017 through April 1, 2019**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Louise Renne (P)										0.20	0.50	3.00			3.70	$650.00	$2,405.00
Steve Cikes (P)								0.20	0.50	1.70	3.40	4.00			9.80	$425.00	$4,165.00
Steve Shaw (P)										1.00					1.00	$400.00	$400.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**0.50**	**2.90**	**3.90**	**7.00**	**0.00**	**0.00**	**14.50**		**$6,970.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.20**	**0.50**	**2.90**	**3.90**	**7.00**	**0.00**	**0.00**	**14.50**		**$6,970.00**

EXHIBIT C

Date	Attorney	Description	Category	Hourly Rate	Time	Amount
4/12/2017	Steve Shaw	Review order denying Plaintiffs' motion for class certification (0.7); confer with S. Cikes regarding [redacted] (0.3)	10	400	1.00	400.00
4/14/2017	Steve Cikes	Confer with S. Shaw and L. Renne regarding [redacted] (0.5)	10	425	0.50	212.50
4/17/2017	Louise Renne	Attention to e-mail and confer with S. Cikes regarding [redacted]	10	650	0.20	130.00
4/17/2017	Steve Cikes	Attention to emails regarding [redacted] (0.2)	8	425	0.20	85.00
4/18/2017	Steve Cikes	Email to Richmond and Palo Alto regarding [redacted] (1.0); attention to emails regarding [redacted] (0.2)	10	425	1.20	510.00
4/25/2017	Steve Cikes	Review pro se notice of appeal and related court filings and confer with S. Shaw regarding [redacted]	9	425	0.50	212.50
12/21/2017	Steve Cikes	Prepare email summary regarding [redacted] (1.0)	11	425	1.00	425.00
6/25/2018	Louise Renne	Review lead counsel's letter regarding [redacted] email exchange with S. Cikes and L. Weaver regarding [redacted]	12	650	0.30	195.00
6/25/2018	Steve Cikes	Review letter from lead counsel regarding [redacted] and email exchange with L. Renne and L. Weaver regarding [redacted]	12	425	0.30	127.50
7/5/2018	Louise Renne	Attention to emails regarding [redacted]	12	650	0.50	325.00
7/5/2018	Steve Cikes	Attention to emails regarding [redacted]	12	425	0.50	212.50
7/6/2018	Louise Renne	Call with L. Weaver and S. Cikes regarding [redacted]	12	650	0.50	325.00
7/6/2018	Steve Cikes	Call with L. Weaver and L. Renne regarding [redacted] (0.5); draft emails to client regarding [redacted] (0.5)	12	425	1.00	425.00
7/9/2018	Louise Renne	Attention to emails regarding [redacted]	12	650	0.20	130.00
7/9/2018	Steve Cikes	Attention to emails regarding [redacted]	12	425	0.20	85.00
7/16/2018	Louise Renne	Review correspondence from lead counsel regarding [redacted] and email exchange with L. Weaver and S. Cikes regarding	12	650	0.50	325.00
7/16/2018	Steve Cikes	Review correspondence from lead counsel regarding [redacted] and email exchange with L. Weaver and L. Renne regarding [redacted]	12	425	0.50	212.50
7/18/2018	Louise Renne	Call with L. Weaver regarding [redacted]	12	650	0.20	130.00
7/18/2018	Steve Cikes	Call with L. Weaver regarding recent [redacted]	12	425	0.20	85.00
7/24/2018	Louise Renne	Call with L. Weaver and S. Cikes regarding [redacted] (0.3); attention to emails regarding [redacted] (0.2)	12	650	0.50	325.00
7/24/2018	Steve Cikes	Call with L. Weaver and L. Renne regarding [redacted] (0.3); attention to emails regarding same (0.2)	12	425	0.50	212.50
7/26/2018	Louise Renne	Email exchange with L. Weaver and S. Cikes regarding same	12	650	0.30	195.00
7/27/2018	Steve Cikes	Draft email to Richmond and Palo Alto regarding [redacted] (0.5); email exchange with L. Weaver and L. Renne regarding [redacted] (0.3)	12	425	0.80	340.00
8/3/2018	Steve Cikes	Email exchange with L. Weaver regarding [redacted]	11	425	0.20	85.00
8/21/2018	Steve Cikes	Review claims forms for Richmond and Palo Alto and attention to emails regarding [redacted]	11	425	0.50	212.50
8/30/2018	Steve Cikes	Draft emails to Richmond and Palo Alto regarding [redacted]	11	425	0.50	212.50
8/31/2018	Steve Cikes	Attention to emails from Richmond and Palo Alto regarding [redacted]	11	425	0.20	85.00
11/20/2018	Louise Renne	Call with S. Cikes and L. Weaver regarding [redacted]	11	650	0.50	325.00

11/20/2018	Steve Cikes	Call with L. Renne and L. Weaver regarding [redacted] and attention to emails regarding [redacted] (0.5); draft email to Richmond and Palo Alto regarding [redacted] (0.5)	11	425	1.00	425.00

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
RENNE PUBLIC LAW GROUP and SLOAN SAKAI YEUNG & WONG LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	482.53
Miscellaneous	
TOTAL:	$482.53

EXHIBIT 53

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF STEVE CIKES IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF RENNE SLOAN HOLTZMAN SAKAI LLP**

I, Steve Cikes, declare:

1. I am Senior Counsel with the law firm of Renne Sloan Holtzman Sakai LLP ("Renne Sloan"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to governmental subclass representatives the City of Palo Alto and the City of Richmond and as counsel for IPPs throughout the course of this litigation. The background and experience of Renne Sloan and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Renne Sloan performed the following work: (a) conferring with Lead Counsel concerning issues related to the governmental subclass; (b) review and drafting of pleadings related to the governmental subclass; (c) conferring with representatives from the City of Palo Alto and the City of Richmond concerning case developments and discovery-related issues, including the development and implementation of document retention protocols; (d) preparing responses on behalf of the City of Palo Alto and the City of Richmond to Defendants' written discovery; (e) assisting in the collection, review, and production of documents by the City of Palo Alto and the City of Richmond in response to Defendants' discovery demands; and (f) preparing for and attending Defendants' FRCP 30(b)(6) depositions of the City of Palo Alto and the City of Richmond.

5. Attached hereto as **Exhibit B** is a billing summary of Renne Sloan's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead

counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Renne Sloan during this period of time was 284.90, with a corresponding lodestar based on current rates of $123,629.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Renne Sloan.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Renne Sloan has incurred during the course of this litigation. Renne Sloan expended a total of $516.53 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Renne Sloan on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Renne Sloan in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017 at San Francisco, California.

/s/ Steve Cikes

Steve Cikes

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Public Management Group™
Renne Sloan Holtzman Sakai

E E H T I B IC

Renne Sloan Holtzman Sakai LLP was founded by Louise Renne and Jonathan Holtzman in 2002. Prior to founding the firm, Louise Renne served as the elected City Attorney of the City and County of San Francisco from 1986-2002. Ms. Renne built the City Attorney's Office into a widely respected public law firm with more than 200 lawyers practicing in virtually every area of civil law, with an annual budget of $35 million. Widely known for having "reinvented" municipal law by filing class actions against tobacco, insurance companies, energy producers, national banks, gun and lead paint manufacturers and escrow companies, Ms. Renne has recovered over $1 billion for California taxpayers. Ms. Renne was instrumental in assembling large coalitions of public agencies to pursue these public interest cases and achieved national recognition for their successful resolutions. Ms. Renne's approach to affirmative litigation has provided a national model for modernizing the traditionally defense-oriented practice of public sector law and has broken ground in affirmative litigation on behalf of public agencies. Some examples of the cases brought by Ms. Renne while City Attorney include:

- Represented cities and counties throughout California in lawsuits against the tobacco industry to recover damages incurred to local and state government. The lawsuits, later joined by the California Attorney General, recovered $25 billion, half of which now goes to California local government agencies. San Francisco's share of the recovery is estimated to be $585 million over 25 years.

- Represented over 300 California cities and counties in a false claims act whistleblower lawsuit against Bank of America. The lawsuit argued that proceeds from as many as 14,000 bond issues valued at $100 billion and managed by the bank since the 1940s had been illegally retained by the bank. Local governments recovered $187.5 million in this lawsuit.

- Represented public agencies in a $50 million lawsuit against Old Republic Title, alleging that the company engaged in a scheme to collect illegal interest payments on escrow accounts. Subsequently, Department of Insurance initiated an investigation and the State Controller filed suit. The suit ultimately recovered $8 million for the City and County of San Francisco.

- While serving as General Counsel for the San Francisco Unified School District ("SFUSD"), uncovered a nation-wide scandal, known as the "e-rate" scandal, in which numerous technology vendors and computer consultants conspired to defraud a federal government program of millions of dollars intended for the purchase of computer equipment for public schools. As part of a settlement with one company, a total of almost $16 million was paid to the federal government, of which SFUSD received $3.3 million.

- Represented California cities and counties in a lawsuit which successfully prevented tobacco companies from targeting minors in advertising. The lawsuit, often referred to as the "Joe Camel" case, resulted in a settlement in which Camel agreed to cease advertising directed at minors.

- In a case against a Fortune 250 company on behalf of SFUSD, recovered $43.1 million for SFUSD in a breach of contract and false claims lawsuit.

Renne Sloan has grown over the last few years to include approximately 37 lawyers, and over 50 total staff, and frequently partners with other law firms in affirmative litigation cases. Roughly one quarter of the lawyers in the firm work on affirmative litigation; the firm has represented multiple public entities and individuals in class actions within California and across the United States relating to insurance broking and elder financial abuse.

Public Management Group™
Renne Sloan Holtzman Sakai

LOUISE H. RENNE

Louise H. Renne is the founding partner of Renne Sloan Holtzman & Sakai, Public Law Group, LLP. Prior to founding the Public Law Group, she served as San Francisco City Attorney, an elective office, from 1986 to 2002, when she chose not to seek a fifth term.

Her current cases include a shareholder derivative action against Wells Fargo's officers and directors challenging a colossal scheme of illegal sales practices that deceived thousands of the Bank's own customers and was the subject of was the subject of regulatory proceedings brought by the Consumer Financial Protection Bureau and the U.S. Office of the Comptroller of Currency. Ms. Renne also represents the Cities of Palo Alto and Richmond, leading a municipal subclass in an antitrust action against Japanese and Korean manufacturers of lithium ion battery cells, and their American subsidiaries.

Ms. Renne is known in legal and government circles for transforming the traditionally defense-oriented practice of municipal law by pioneering an affirmative litigation program that won significant victories for cities and counties in California.

In what one newspaper termed "Renne's Revolution," she organized multiparty consumer protection lawsuits on behalf of local government and non-profit plaintiffs to reform unfair business practices by energy producers, tobacco companies, national banks, gun manufacturers, auto insurers and escrow companies.

Ms. Renne was appointed City Attorney by Mayor Dianne Feinstein in 1986 to fill the unexpired term of her predecessor, who died in office. She was subsequently elected to three full four-year terms.

Ms. Renne modernized the City Attorney's office, establishing it as a national leader in the practice of public law. She energized and streamlined its advice function, building widely respected legal expertise in every area of municipal operations ranging from traditional fields such as land use and public protection to the cutting-edge areas of energy regulation and telecommunications.

She created a vigorous and enterprising 200-lawyer city department of litigators, negotiators and regulatory attorneys, attracting top talent from private sector firms, law schools and judicial clerkships nationwide. Ms. Renne's new model of the public law firm attracted wide attention among city and county legal departments for recasting the municipal attorney in a more activist role as legal problem solver, inter-agency and community mediator, and neighborhood services provider.

Among Ms. Renne's improvements adopted by other cities and counties was the City Attorney's Code Enforcement Task Force, commended by the Ford Foundation and the Kennedy School of Government at Harvard University in 1991 for innovation in local government. Task force lawyers were assigned to meet regularly with residents in the

city's neighborhoods, responding to complaints of code violations. They took legal action to close crack houses, clean up apartment house slums, ensure disability access, and enforce the health and safety laws.

Prior to becoming City Attorney, Ms. Renne was a member of the San Francisco Board of Supervisors from 1978 – 1986, where she was chair of the Finance Committee.

She was a California deputy attorney general from 1966 – 1977. She served in the environmental and criminal divisions, and argued on behalf of the state before the California and United States Supreme Courts.

She was in private practice from 1964 – 1966 and was a staff attorney in the general counsel's office at the Federal Communications Commission from 1961 – 1964.

She has been a member of the California Regional Water Quality Control Board and the Golden Gate Bridge District Board of Directors. She is a former president of California Women Lawyers, and is on the board of the San Francisco chapters of the American Cancer Society, Friends of the Children, and the PGA's First Tee program, as well as the boards of the San Francisco Fine Arts Museums and the Volunteers of Laguna Honda Hospital, the nation's largest publicly-run skilled nursing facility.

She is currently President of the San Francisco Police Commission and has served as the General Counsel for the San Francisco Unified School District.

Ms. Renne was raised in Pittsburgh, PA and attended college at Michigan State University. She earned her law degree at Columbia University in 1961.

Ms. Renne is well known and well respected nationally. She was named one of the State's top attorneys by California Lawyer Magazine in 1997 and has been consistently recognized as a Northern California Super Lawyer from 2004 to present. She is often called upon to testify before federal, state and other governmental bodies and is frequently asked to conduct impartial investigations for school, municipal and county governments.

Renne Sloan Holtzman Sakai LLP
Public Law Group®



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PRACTICE AREAS

Administrative Hearings & Arbitration

Appeals & Writ

Employment Law & Litigation

Government Law & Litigation

Labor Relations & Labor Law

Public Interest Litigation

BAR ADMISSION

California

EDUCATION

Golden Gate University, School of Law, JD

University of San Francisco, BS

San Francisco State University, BA

Steve Cikes

Senior Counsel

EXPERIENCE

Mr. Cikes represents public agencies and non-profit organizations in a wide range of subjects, specializing in labor and employment matters. He also represents the firm's clients in public interest litigation. Mr. Cikes has extensive litigation experience, having handled a variety of complex cases before administrative tribunals and state and federal courts. Recently, he was instrumental in securing two important victories on behalf of the firm's clients in proceedings before the California Court of Appeal, both of which resulted in published appellate decisions.

RELATED EXPERIENCE

During law school, Mr. Cikes served as a judicial extern for United States District Court Judge William H. Alsup and as a law clerk for the United States Attorney's Office, Criminal Division in San Francisco.

REPRESENTATIVE PUBLISHED DECISIONS

- County of Sonoma v. Superior Court, 173 Cal. App. 4th 322 (2009)
- U.S. Western Falun Dafa Assn. v. Chinese Chamber of Commerce, 163 Cal. App. 4th 590 (2008)
- Martin v. City of Richmond, 504 F. Supp. 2d 766 (N.D. Cal. 2007)

EXHIBIT B

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

Firm Name: Renne Sloan Holtzman Sakai LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Louise Renne (P)			2.00					0.30	0.50	0.50	4.90	0.40			8.60	$650.00	$5,590.00
Scott Dickey (P)								1.00	1.50		41.20				43.70	$475.00	$20,757.50
Scott Dickey (P)							1.60								1.60	$350.00	$560.00
Steve Cikes (P)			81.30		97.40	1.20		2.70	2.30	5.50	20.50	3.30			214.20	$425.00	$91,035.00
Steve Cikes (P)							14.00								14.00	$350.00	$4,900.00
Steven P. Shaw (OC)			1.00												1.00	$400.00	$400.00
Jessica Kenney (A)											1.80				1.80	$215.00	$387.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**84.30**	**0.00**	**97.40**	**1.20**	**15.60**	**4.00**	**4.30**	**6.00**	**68.40**	**3.70**	**0.00**	**0.00**	**284.90**		**$123,629.50**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**84.30**	**0.00**	**97.40**	**1.20**	**15.60**	**4.00**	**4.30**	**6.00**	**68.40**	**3.70**	**0.00**	**0.00**	**284.90**		**$123,629.50**

EXHIBIT C

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation

RENNE SLOAN HOLTZMAN SAKAI LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Louise Renne (P)	06/1/2013 – 02/28/2017	$650.00
Scott Dickey (P)	06/1/2013 – 02/28/2017	$475.00
Steve Cikes (A)	06/1/2013 – 02/28/2017	$425.00
Steven P. Shaw (A)	06/1/2013 – 02/28/2017	$400.00
Jessica Kenney (A)	06/1/2013 – 02/28/2017	$215.00
–		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

Date	Attorney	Description	Category	Hourly Rate	Time	Amount
6/10/2013	Louise Renne (P)	[redacted]	11	650	0.50	325.00
6/28/2013	Steve Cikes (A)	Email exchange with team and call with S. Dickey regarding status of consolidated amended complaint and protective order and review documents (0.5); [redacted] regarding same (0.3)	9	425	0.80	340.00
6/28/2013	Scott Dickey (P)	Review stipulated protective order and [redacted]	9	475	0.80	380.00
7/1/2013	Steve Cikes (A)	[redacted] (0.5); review draft amended consolidated class action complaint and email exchange with L. Renne, L. Weaver and R. Green regarding same (1.0)	9	425	1.50	637.50
7/2/2013	Louise Renne (P)	Phone calls with co-counsel and lead counsel regarding amended class action complaint	11	650	0.30	195.00
7/2/2013	Steve Cikes (A)	Prepare for and participate in call with L. Renne, L. Weaver and R. Green regarding consolidated amended class action complaint (0.5); conference call with L. Renne, L. Weaver, R. Green and lead counsel representatives regarding same (0.3)	11	425	0.80	340.00
7/31/2013	Steve Cikes (A)	Confer with L. Weaver regarding client documents (0.3); prepare Palo Alto retention agreement and email exchange with L. Weaver and S. Dickey regarding same (0.7)	11	425	1.00	425.00
10/16/2013	Louise Renne (P)	Attention to e-mail regarding motion to dismiss	8	650	0.30	195.00
12/10/2013	Steve Cikes (A)	Prepare for and participate in conference call with L. Renne, S. Dickey, R. Green and L. Weaver regarding case status and discovery efforts (0.5); follow-up discussion with S. Dickey regarding same (0.5); [redacted] (1.0)	11	425	2.00	850.00
12/10/2013	Louise Renne (P)	Conference call with co-counsel	11	650	0.20	130.00
1/8/2014	Steve Cikes (A)	Call with L. Weaver and S. Dickey regarding discovery	11	425	1.00	425.00
1/14/2014	Scott Dickey (P)	[redacted]	11	475	0.60	285.00
1/16/2014	Steve Cikes (A)	Call with S. Dickey and L. Weaver regarding discovery	11	425	0.50	212.50
1/21/2014	Scott Dickey (P)	[redacted]	11	475	1.20	570.00

1/24/2014	Scott Dickey (P)	Meet with S. Cikes regarding discovery preparations	11	475	0.30	142.50
1/27/2014	Steve Cikes (A)	[redacted]	11	425	0.50	212.50
2/5/2014	Scott Dickey (P)	[redacted]	11	475	0.80	380.00
2/6/2014	Scott Dickey (P)	[redacted]	11	475	0.90	427.50
2/7/2014	Scott Dickey (P)	[redacted]	11	475	0.60	285.00
2/11/2014	Steve Cikes (A)	[redacted]	11	425	1.00	425.00
2/12/2014	Scott Dickey (P)	Telephone conference with L. Renne, S. Cikes and L. Weaver regarding strategy	11	475	0.80	380.00
2/12/2014	Steve Cikes (A)	[redacted] (2.5); participate in conference call with L. Renne, L. Weaver and S. Dickey regarding discovery issues and motion to dismiss briefing (0.7)	11	425	3.20	1,360.00
2/12/2014	Steve Cikes (A)	Confer with L. Weaver regarding motion to dismiss briefing dealing with public entity clients (0.5)	8	425	0.50	212.50
2/12/2014	Louise Renne (P)	Conference call with co-counsel regarding case strategy	11	650	0.80	520.00
2/26/2014	Scott Dickey (P)	Telephone conference with L. Renne and L, Weaver; attention to emails	11	475	0.70	332.50
2/26/2014	Steve Cikes (A)	[redacted] and conference call regarding Round 2 motion to dismiss briefing	11	425	1.50	637.50
3/4/2014	Steve Cikes (A)	[redacted]	11	425	2.00	850.00
3/5/2014	Steve Cikes (A)	[redacted]	11	425	2.50	1,062.50
3/6/2014	Scott Dickey (P)	[redacted]	11	475	0.30	142.50
3/6/2014	Steve Cikes (A)	[redacted]	11	425	0.50	212.50
3/14/2014	Scott Dickey (P)	Review and revise opposition to Motion to Dismiss	8	475	1.00	475.00

3/18/2014	Steve Cikes (A)	Review draft insert for motion to dismiss opposition on standing issue and S. Dickeys' edits thereto (0.5); conduct legal research regarding same (1.5); email to L. Weaver regarding same (0.2)	8	425	2.20	935.00
4/1/2014	Scott Dickey (P)	[redacted]	11	475	0.50	237.50
4/7/2014	Scott Dickey (P)	Discuss discovery issues with S. Cikes	11	475	0.20	95.00
4/8/2014	Scott Dickey (P)	[redacted]	11	475	0.40	190.00
4/9/2014	Steve Cikes (A)	[redacted] (0.2)	11	425	0.20	85.00
4/14/2014	Scott Dickey (P)	[redacted] review Motion to Dismiss opposition; followup with Richmond, City College regarding records	11	475	3.50	1,662.50
4/25/2014	Steve Cikes (A)	[redacted] (2.0); [redacted] (1.0)	11	425	3.00	1,275.00
5/7/2014	Louise Renne (P)	Conference call with co-counsel regarding case status and motion to dismiss	11	650	0.50	325.00
5/7/2014	Steve Cikes (A)	Call with L. Renne and L. Weaver regarding case status and 5/9 motion to dismiss hearing	11	425	0.50	212.50
5/8/2014	Louise Renne (P)	Conference call with co-counsel regarding case status and motion to dismiss	11	650	0.30	195.00
5/8/2014	Steve Cikes (A)	Call with L. Renne and L. Weaver regarding case status and 5/9 motion to dismiss hearing (0.3)	11	425	0.30	127.50
5/13/2014	Scott Dickey (P)	[redacted]	11	475	0.60	285.00
5/15/2014	Scott Dickey (P)	[redacted] ; strategize with S. Cikes, S. Shaw	11	475	1.00	475.00
5/16/2014	Scott Dickey (P)	[redacted]	11	475	1.30	617.50
5/19/2014	Scott Dickey (P)	Review documents from Richmond regarding purchases of covered products	7	350	0.20	70.00
6/16/2014	Scott Dickey (P)	Review documents from Richmond regarding purchases of covered products	7	350	1.40	490.00

7/14/2014	Scott Dickey (P)	Review discovery order and emails to L. Weaver	9	475	0.30	142.50
7/15/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding discovery issues	11	475	0.20	95.00
7/21/2014	Scott Dickey (P)	[redacted] (0.2); telephone call to L. Weaver regarding discovery (0.1); [redacted] (0.8)	11	475	1.10	522.50
7/24/2014	Scott Dickey (P)	[redacted]	11	475	0.50	237.50
7/25/2014	Scott Dickey (P)	[redacted] (0.3); emails with L. Weaver regarding next steps (0.3)	11	475	0.60	285.00
8/29/2014	Scott Dickey (P)	Telephone conference with L. Renne and L. Weaver regarding discovery, motions to dismiss, and next steps	11	475	0.50	237.50
8/29/2014	Louise Renne (P)	Telephone conference with S. Dickey and L. Weaver regarding discovery, Motions to Dismiss, and next steps	11	650	0.50	325.00
9/11/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding Attorney General Call and custodian of record issues; attention to email	11	475	0.70	332.50
9/15/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding custodian issues related to relevant public entity purchase documents	11	475	0.30	142.50
9/16/2014	Scott Dickey (P)	Telephone conference with L. Weaver regarding discovery issues related to relevant public entity purchase documents	11	475	0.30	142.50
9/22/2014	Scott Dickey (P)	Prepare for and participate in teleconference with L. Weaver	11	475	0.60	285.00
9/23/2014	Scott Dickey (P)	Prepare for and participate in telephone conference with D. Landrinos and L. Weaver regarding custodian of records and electronically stored information	11	475	1.00	475.00
9/24/2014	Scott Dickey (P)	Telephone conference with L. Weaver and L. Renne regarding upcoming discovery needs (0.4); [redacted] (0.4)	11	475	0.80	380.00
9/24/2014	Louise Renne (P)	Telephone conference with L. Weaver and S. Dickey regarding upcoming discovery needs	11	650	0.40	260.00
9/26/2014	Scott Dickey (P)	Per L. Renne, discuss Lithium batteries case and upcoming needs with J. Kenny	11	475	0.70	332.50
9/29/2014	Scott Dickey (P)	[redacted]	11	475	0.40	190.00

9/30/2014	Scott Dickey (P)	[redacted]	11	475	3.20	1,520.00
9/30/2014	J. Kenny (A)	[redacted]	11	215	0.30	64.50
9/30/2014	Louise Renne (P)	[redacted]	11	650	0.30	195.00
10/1/2014	J. Kenny (A)	[redacted] (0.5)	11	215	1.50	322.50
10/1/2014	Scott Dickey (P)	[redacted]	11	475	2.60	1,235.00
10/3/2014	Scott Dickey (P)	[redacted] (1.3); [redacted] (1.2)	11	475	2.50	1,187.50
10/6/2014	Scott Dickey (P)	[redacted]	11	475	2.50	1,187.50
10/7/2014	Scott Dickey (P)	[redacted] (3.0); [redacted] (0.4)	11	475	3.40	1,615.00
10/8/2014	Scott Dickey (P)	Finalize discovery letters and deliver to co-counsel	11	475	2.20	1,045.00
10/10/2014	Scott Dickey (P)	Revise and finalize discovery letters per co-counsel edits	11	475	0.50	237.50
11/10/2014	Scott Dickey (P)	Review pleadings and respond to email regarding joint stipulation and order	9	475	0.40	190.00
11/26/2014	Scott Dickey (P)	Review pleadings regarding discovery	11	475	1.00	475.00
12/5/2014	Scott Dickey (P)	Review proposed discovery plan; emails regarding same; draft revised discovery plan	11	475	0.80	380.00
12/8/2014	Scott Dickey (P)	Review discovery plan and discuss discovery strategy with L. Renne and L. Weaver	11	475	0.30	142.50
12/8/2014	Louise Renne (P)	Review discovery plan and discuss discovery strategy with S. Dickey and L. Weaver	11	650	0.30	195.00
12/9/2014	Scott Dickey (P)	Review proposed discovery plan; emails to L. Renne and L. Weaver regarding same; telephone conference with L. Weaver	11	475	0.80	380.00

3/31/2015	Louise Renne (P)	Attention to e-mail regarding potential conflict of interest issue	11	650	0.10	65.00
4/2/2015	Louise Renne (P)	Confer with S. Shaw regarding conflict waiver	11	650	0.10	65.00
4/3/2015	Louise Renne (P)	Attention to e-mail regarding conflict waiver	11	650	0.10	65.00
4/21/2015	Steve Cikes (A)	Review defendants' discovery to plaintiffs (0.5); conference call with L. Weaver and L. Renne regarding case status and discovery (0.3)	3	425	0.80	340.00
4/22/2015	Steve Cikes (A)	Prepare for and call with L. Weaver regarding discovery responses for government entity plaintiffs (0.5); conference call with L. Weaver and D. Lambrinos regarding same (1.0); follow-up call with L. Weaver regarding same (0.3)	3	425	1.80	765.00
4/23/2015	Steve Cikes (A)	Review master grid and document checklist from Cotchett firm and email from D. Lambrinos regarding same (0.5); review notes from Palo Alto client meeting regarding procurement procedures (0.5); [redacted] (0.3)	3	425	1.30	552.50
4/24/2015	Steve Cikes (A)	Call with S. Dickey regarding Richmond documents responsive to Samsung Defendants' discovery	3	425	0.50	212.50
4/24/2015	Steve Cikes (A)	Locate and review Richmond documents	7	350	2.00	700.00
4/27/2015	Steve Shaw (A)	Confer with S. Cikes regarding strategy for responding to interrogatories and document requests	3	400	0.20	80.00
4/27/2015	Steve Cikes (A)	Review Richmond and Palo Alto emails and documents	7	350	2.00	700.00
4/27/2015	Steve Cikes (A)	[redacted] (0.5); email exchange with L. Weaver regarding same (0.3); prepare discovery responses (1.5)	3	425	2.30	977.50
4/28/2015	Steven Shaw (A)	Confer with S. Cikes regarding responses and objections to discovery requests to City of Richmond and City of Palo Alto (0.5); provide research concerning applicability of FRCP 33(d) in responding to interrogatories (0.3)	3	400	0.80	320.00

4/28/2015	Steve Cikes (A)	[redacted] (0.2); [redacted] (0.3); call with L. Weaver regarding discovery responses (0.2); [redacted] s (0.5); [redacted] (0.3); prepare discovery responses (3.0)	3	425	4.50	1,912.50
4/29/2015	Louise Renne (P)	Attention to e-mail regarding discovery	3	650	0.50	325.00
4/29/2015	Steve Cikes (A)	Email exchange with L. Weaver and L. Renne regarding Richmond and Palo Alto discovery responses (0.5); review D. Lambrinos' email regarding discovery response templates (0.7)	3	425	1.20	510.00
4/30/2015	Steve Cikes (A)	[redacted]	3	425	0.30	127.50
5/4/2015	Louise Renne (P)	Confer with S. Cikes regarding discovery	3	650	0.50	325.00
5/4/2015	Steve Cikes (A)	Confer with L. Renne regarding Richmond and Palo Alto discovery responses (0.5); email exchange with L. Weaver regarding same (0.3); [redacted] (0.5)	3	425	1.30	552.50
5/5/2015	Steve Cikes (A)	Review draft Richmond and Palo Alto discovery responses and email exchange with L. Weaver regarding same (0.5); call with D. Lambrinos regarding same (0.2); edit and revise Richmond and Palo Alto discovery responses (4.0)	3	425	4.70	1,997.50
5/6/2015	Steve Cikes (A)	Review L. Weaver's edits to Richmond and Palo Alto discovery responses and email exchange with L. Weaver regarding same (0.5); prepare additional edits and revisions to Richmond and Palo Alto discovery responses (1.0); [redacted] (0.5); [redacted] (1.3)	3	425	3.30	1,402.50

5/7/2015	Steve Cikes (A)	Prepare for and attend meeting with L. Weaver [redacted] regarding Richmond discovery responses and document production (2.5); edit and revise Richmond interrogatory responses and email exchange with L. Weaver regarding same (1.0)	3	425	3.50	1,487.50
5/11/2015	Louise Renne (P)	Attention to e-mail regarding court order	9	650	0.50	325.00
5/13/2015	Steve Cikes (A)	[redacted] (0.2); email exchange with L. Weaver regarding same (0.3)	3	425	0.50	212.50
5/14/2015	Steve Cikes (A)	Edit and revise Richmond interrogatory responses and [redacted] (1.0); edit and revise Palo Alto interrogatory responses and [redacted] (0.6); email exchange with L. Weaver and D. Lambrinos regarding need for extension on Palo Alto discovery responses (0.5)	3	425	2.10	892.50
5/15/2015	Steve Cikes (A)	Email exchange with L. Weaver and [redacted] regarding meeting to dismiss Palo Alto discovery responses and document production (0.5); prepare for Palo Alto meeting (1.5)	3	425	2.00	850.00
5/18/2015	Steve Cikes (A)	[redacted] (3.5)	3	425	3.50	1,487.50
5/19/2015	Steve Cikes (A)	Prepare notes from [redacted] regarding Palo Alto discovery responses and document production (1.5); email exchange with L. Weaver and [redacted] regarding same (0.2)	3	425	1.70	722.50
5/19/2015	Steve Cikes (A)	Review Palo Alto document production to date (1.0)	7	350	1.00	350.00
5/20/2015	Steve Cikes (A)	[redacted] (0.3); email exchange with L. Weaver and [redacted] regarding same (0.2); edit and revise Palo Alto interrogatory responses and [redacted] (1.0)	3	425	1.50	637.50
5/21/2015	Steve Cikes (A)	Conference call with L. Weaver and [redacted] regarding Palo Alto discovery responses and document production (0.5)	3	425	0.50	212.50

5/21/2015	Steve Cikes (A)	Review additional documents from Palo Alto	7	350	1.00	350.00
5/26/2015	Steve Cikes (A)	Prepare Palo Alto document production and email exchange with L. Weaver regarding same (1.5); [redacted] (0.2); [redacted] (0.3); edit and revise Palo Alto interrogatory responses and [redacted] (0.5)	3	425	2.50	1,062.50
5/27/2015	Steve Cikes (A)	Conference call with L. Weaver and D. Lambrinos regarding Richmond and Palo Alto discovery responses (1.0)	3	425	1.00	425.00
5/27/2015	Steve Cikes (A)	Review additional document production from Richmond and email exchange with L. Weaver regarding same (0.5)	7	350	0.50	175.00
5/28/2015	Steve Cikes (A)	Review completed Palo Alto document production and email exchange with L. Weaver regarding same (1.0)	7	350	1.00	350.00
5/28/2015	Steve Cikes (A)	[redacted] (0.5); [redacted] (0.2); [redacted] (0.2); [redacted] (0.3); [redacted] (0.3)	3	425	1.50	637.50
5/29/2015	Steve Cikes (A)	Review and finalize initial Palo Alto document production and email exchange with L. Weaver regarding same (1.5)	7	350	1.50	525.00
5/29/2015	Steve Cikes (A)	[redacted] 0.2)	3	425	0.20	85.00
6/1/2015	Steve Cikes (A)	Finalize Palo Alto interrogatory responses and document production and email exchange with L. Weaver regarding same	3	425	1.50	637.50
6/2/2015	Steve Cikes (A)	Email exchanges with L. Weaver regarding miscellaneous discovery issues for Palo Alto and Richmond (0.3); email exchanges with L. Weaver and [redacted] regarding Richmond discovery responses (0.3)	3	425	0.60	255.00

6/3/2015	Steve Cikes (A)	[redacted]	3	425	3.00	1,275.00
6/4/2015	Steve Cikes (A)	Email exchange with L. Weaver regarding scope of Richmond and Palo Alto document production (0.3); [redacted] (0.2)	3	425	0.50	212.50
6/8/2015	Steve Cikes (A)	Email exchange with L. Weaver and Richmond and Palo Alto clients regarding email search terms (0.5); draft letter to defendants regarding same (0.5)	6	425	1.00	425.00
6/9/2015	Steve Cikes (A)	Call with L. Weaver regarding Richmond and Palo Alto discovery responses and document production and email exchange regarding same	3	425	0.50	212.50
6/11/2015	Steve Cikes (A)	Review responses to defendants' second set of interrogatories and email exchange with L. Weaver regarding same (0.5); email exchange with L. Weaver and [redacted] regarding discovery responses and document collection for Palo Alto (0.3)	3	425	0.80	340.00
6/16/2015	Steve Cikes (A)	[redacted] (0.2); [redacted] (0.5)	3	425	0.70	297.50
6/17/2015	Steve Cikes (A)	[redacted]	3	425	3.00	1,275.00
6/18/2014	Steve Cikes (A)	[redacted] (0.3); review photographs from [redacted] (0.2)	3	425	0.50	212.50
6/19/2015	Steve Cikes (A)	[redacted]	3	425	0.30	127.50
6/22/2015	Louise Renne (P)	Confer with S. Cikes regarding case status and meeting with co-counsel	11	650	0.50	325.00
7/10/2015	Steve Cikes (A)	Call with L. Weaver regarding Palo Alto and Richmond supplemental document production	3	425	0.50	212.50

7/21/2015	Steve Cikes (A)	[redacted] (0.3); [redacted] (0.5)	3	425	0.80	340.00
7/23/2015	Steve Cikes (A)	Review supplemental document production from Palo Alto and email exchange with L. Weaver regarding same	3	425	1.00	425.00
9/15/2015	Steve Cikes (A)	Draft emails to Richmond and Palo Alto regarding Toshiba Defendants' supplemental discovery requests	3	425	0.50	212.50
9/29/2015	Steve Cikes (A)	[redacted] (0.5); [redacted] (0.3); draft discovery responses for Palo Alto and Richmond (0.6)	3	425	1.40	595.00
9/29/2015	Steve Cikes (A)	Review Palo Alto documents regarding same (1.0);	7	350	1.00	350.00
9/30/2015	Steve Cikes (A)	Review Palo Alto documents responsive to Toshiba Defendants' supplemental discovery responses (1.0)	7	350	1.00	350.00
9/30/2015	Steve Cikes (A)	Email to D. Lamborios from Cotchett with Richmond and Palo Alto supplemental discovery responses (0.3)	3	425	0.30	127.50
10/12/2015	Steve Cikes (A)	Review Palo Alto and Richmond documents responsive to Toshiba defendants' supplemental discovery request (2.0)	7	350	2.00	700.00
10/12/2015	Steve Cikes (A)	Review 10/12 letter from D. Lambrinos to Defendants' counsel regarding class representative discovery issues and follow-up email exchange with L. Weaver regarding same (0.3)	3	425	0.30	127.50
10/13/2015	Steve Cikes (A)	Review Palo Alto and Richmond documents responsive to Toshiba defendants' supplemental discovery requests (1.0);	7	350	1.00	350.00
10/13/2015	Steve Cikes (A)	Email exchange and follow-up call with L. Weaver regarding same (0.5)	3	425	0.50	212.50
10/14/2015	Steve Cikes (A)	Prepare Palo Alto and Richmond document production in response to Toshiba defendants' supplemental discovery requests and confer with L. Weaver regarding same	3	425	2.00	850.00

12/21/2015	Steve Cikes (A)	Review email from D. Lambrinos regarding potential deposition dates for Richmond and Palo Alto and email exchange with L. Weaver regarding same	5	425	0.50	212.50
1/4/2016	Steve Cikes (A)	Attention to emails regarding discovery issues	5	425	0.50	212.50
1/6/2016	Steve Cikes (A)	Review daft deposition notices for Palo Alto and Richmond (0.8); email exchange with L. Weaver regarding same (0.2)	5	425	1.00	425.00
1/8/2016	Steve Cikes (A)	Call with L. Weaver regarding Palo Alto and Richmond depositions (0.3); [redacted] (0.3)	5	425	0.60	255.00
1/11/2016	Steve Cikes (A)	[redacted] (0.3)	5	425	0.30	127.50
1/11/2016	Steve Cikes (A)	Email exchange with D. Lambrinos regarding discovery verifications for Palo Alto and Richmond (0.2)	3	425	0.20	85.00
1/13/2016	Steve Cikes (A)	Calls with L. Weaver and Defendants' counsel regarding Richmond and Palo Alto depositions (0.5); [redacted] (0.5)	5	425	1.00	425.00
1/14/2016	Steve Cikes (A)	Calls with L. Weaver regarding Richmond and Palo Alto depositions (0.3); [redacted] (0.3)	5	425	0.60	255.00
1/14/2016	Steve Cikes (A)	Review draft letter to Defendants' counsel regarding Richmond and Palo Alto depositions and email exchange with L. Weaver regarding same (0.2);	6	425	0.20	85.00
1/15/2016	Steve Cikes (A)	[redacted]	5	425	0.20	85.00
1/20/2016	Steve Cikes (A)	Attention to emails regarding Palo Alto and Richmond depositions and email exchange with L. Weaver regarding same	5	425	1.00	425.00
1/22/2016	Steve Cikes (A)	Email exchange with L. Weaver regarding Palo Alto and Richmond depositions	5	425	0.30	127.50
1/26/2016	Louise Renne (P)	Attention to e-mail regarding class certification	10	650	0.50	325.00
2/5/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto depositions	5	425	0.50	212.50
2/19/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto discovery responses (0.3)	3	425	0.30	127.50
2/19/2016	Steve Cikes (A)	Review, edit and revise objections to Palo Alto deposition notice (1.0)	5	425	1.00	425.00

2/22/2016	Steve Cikes (A)	Attention to emails regarding Richmond deposition	5	425	0.30	127.50
2/24/2016	Steve Cikes (A)	Attention to emails regarding Richmond and Palo Alto depositions (0.5); review, edit and revise objections to Palo Alto deposition notice (1.0)	5	425	1.50	637.50
2/26/2016	Steve Cikes (A)	Attention to emails regarding Richmond deposition	5	425	0.50	212.50
3/1/2016	Steve Cikes (A)	Confer with L. Weaver and regarding Richmond and Palo Alto depositions and email exchange regarding same (0.5); [redacted] (0.5); review online docket in preparation for Richmond and Palo Alto depositions (2.0)	5	425	3.00	1,275.00
3/2/2016	Steve Cikes (A)	Review, edit and revise draft objections to Palo Alto deposition notice (1.0); review Palo Alto document production in preparation for upcoming Richmond deposition (3.0); email exchange with L. Weaver and Richmond and Palo Alto regarding deposition prep meetings (0.3)	5	425	4.30	1,827.50
3/3/2016	Steve Cikes (A)	Review K. Kauble Pachman from Susman Godfrey's edits to Palo Alto deposition notice objections (0.5); attention to email exchange between L. Weaver and K. Kauble Pachman regarding Richmond and Palo Alto depositions (0.2); review Palo Alto document production and prepare notes for Palo Alto deposition prep meeting (3.0)	5	425	3.70	1,572.50
3/4/2016	Steve Cikes (A)	Review Block and Levinson analysis of Richmond and Palo Alto document production (1.0); [redacted] (2.0); [redacted] (1.5); [redacted] (0.3); review miscellaneous tolling agreements and filings sent by K. Kauble Pachman regarding status of products at issue in the case (1.0); email exchange with L. Weaver regarding Richmond document production (0.2)	5	425	6.00	2,550.00

3/7/2016	Steve Cikes (A)	Review draft deposition prep outline prepared by K. Kauble Pachman from Susman Godfrey (1.0); email exchange with L. Weaver regarding same	5	425	1.20	510.00
3/13/2016	Steve Cikes (A)	Prepare for Palo Alto deposition meeting	5	425	5.00	2,125.00
3/14/2016	Steve Cikes (A)	[redacted] (1.0); [redacted] (3.5); [redacted] (1.0)	5	425	5.50	2,337.50
3/14/2016	Steve Cikes (A)	Review First Amended Responses to Defendants' First Set of Requests for Production of Documents and First Amended Responses to Toshiba's First Set of Requests for Production of Documents and emails to Richmond and Palo Alto regarding same (1.0)	3	425	1.00	425.00
3/15/2016	Steve Cikes (A)	[redacted] (0.3); calls and email exchange with L. Weaver regarding same (0.5); email exchange with D. Lambrinos regarding Palo Alto and Richmond verifications (0.3); [redacted] (1.0)	3	425	2.10	892.50
3/21/2016	Steve Cikes (A)	[redacted] (3.5); [redacted] (0.5); [redacted] (3.5); [redacted] (0.5)	5	425	8.00	3,400.00
3/22/2016	Steve Cikes (A)	Review Richmond document production and email exchanges regarding same for Richmond deposition (1.0); review additional Richmond documents responsive to Defendants' discovery requests and email exchange with L. Weaver regarding same (1.0)	5	425	2.00	850.00

3/23/2016	Steve Cikes (A)	Review "hot docs" from D. Lambrinos in preparation for Richmond and Palo Alto depositions (1.5); review additional Palo Alto documents (1.0); [redacted] (0.5)	5	425	3.00	1,275.00
3/24/2016	Steve Cikes (A)	[redacted] (0.5); [redacted] (2.0); [redacted] (0.5)	5	425	5.00	2,125.00
3/25/2016	Steve Cikes (A)	Travel to Richmond (0.5): attend Richmond deposition (8.0); return travel to San Francisco (0.5)	5	425	9.00	3,825.00
3/28/2016	Steve Cikes (A)	Review objections to amended Palo Alto deposition notice and email exchange with L. Weaver regarding same	5	425	1.00	425.00
3/29/2016	Steve Cikes (A)	Attention to emails regarding class certification motion as it pertains to indirect purchaser, public entity plaintiffs	10	425	0.30	127.50
3/31/2016	Steve Cikes (A)	[redacted]	5	425	2.50	1,062.50
4/1/2016	Steve Cikes (A)	[redacted] (2.0); [redacted] (1.0); [redacted] (3.0); [redacted] (1.0)	5	425	7.00	2,975.00
4/4/2016	Steve Cikes (A)	Review Sony settlement information for Palo Alto deposition prep	5	425	1.00	425.00
4/5/2016	Steve Cikes (A)	Review Defendants' 3rd Interrogatories and 2nd Requests for Production of Documents to Indirect Purchaser Plaintiffs (0.5); [redacted] (0.3); call with L. Weaver regarding written discovery follow-up and Palo Alto deposition (0.5); [redacted] (0.3); review previously produced Palo Alto emails for production in native format for discovery response and email exchange with L. Weaver regarding (1.0)	3	425	2.60	1,105.00

4/6/2016	Steve Cikes (A)	Review previously produced Palo Alto emails [redacted] in native format [redacted] emails for Palo Alto deposition and email exchange with L. Weaver regarding same	5	425	1.00	425.00
4/7/2016	Steve Cikes (A)	[redacted] (0.8); follow-up call with L. Weaver regarding same (0.2)	3	425	1.00	425.00
4/8/2016	Steve Cikes (A)	[redacted] (0.3)	3	425	0.30	127.50
4/8/2016	Steve Cikes (A)	[redacted] (0.2)	5	425	0.20	85.00
4/12/2016	Steve Cikes (A)	[redacted] (0.3); review co-lead's draft responses to Defendants' Request for Production of Documents to IPPs (Set Two) (0.5); email to Richmond and Palo Alto regarding same (0.5)	3	425	1.30	552.50
4/13/2016	Steve Cikes (A)	Review co-lead's draft responses to Defendants' Interrogatories to IPPs (Set Three) and email to L. Weaver regarding same	3	425	1.00	425.00
4/15/2016	Steve Cikes (A)	Call with M. Desai regarding Palo Alto deposition and follow up email exchange regarding same (0.5); call with L. Weaver regarding Palo Alto deposition (0.2)	5	425	0.70	297.50
4/17/2016	Steve Cikes (A)	[redacted]	5	425	1.50	637.50
4/18/2016	Steve Cikes (A)	[redacted] (1.0); [redacted] (3.0); [redacted] (0.5)	5	425	5.50	2,337.50
4/20/2016	Steve Cikes (A)	Email exchange with L. Weaver and opposing counsel regarding rescheduling Palo Alto deposition	5	425	0.50	212.50
4/27/2016	Louise Renne (P)	Confer with S. Cikes regarding discovery issues	3	650	0.50	325.00
4/27/2016	Steve Cikes (A)	Confer with L. Renne regarding Richmond and Palo Alto discovery issues	3	425	0.50	212.50

5/1/2016	Steve Cikes (A)	[redacted]	3	425	0.20	85.00
5/3/2016	Steve Cikes (A)	Travel to Palo Alto for deposition (1.0); prepare for and attend Palo Alto deposition (9.0); return travel to San Francisco (1.0)	5	425	11.00	4,675.00
5/3/2016	Steve Cikes (A)	[redacted]	3	425	0.70	297.50
5/4/2016	Steve Cikes (A)	[redacted]	3	425	1.00	425.00
5/5/2016	Steve Cikes (A)	[redacted] (0.5); [redacted] (1.0); [redacted] (0.3); [redacted] (0.5)	3	425	2.30	977.50
5/6/2016	Steve Cikes (A)	[redacted] (0.2); [redacted] (0.6)	3	425	0.80	340.00
5/13/2016	Louise Renne (P)	Attention to e-mail regarding discovery	3	650	0.50	325.00
5/13/2016	Steve Cikes (A)	[redacted]	3	425	0.50	212.50
5/16/2016	Steve Cikes (A)	Email exchange with M. Desai regarding Palo Alto document production and discovery responses and review documents/emails regarding same (1.0); [redacted] (0.3)	3	425	1.30	552.50
5/17/2016	Steve Cikes (A)	Email exchange with L. Weaver and M. Desai regarding Richmond discovery responses (0.5); review draft Palo Alto and Richmond discovery responses and further email exchange with L. Weaver and M. Desai regarding same (0.5)	3	425	1.00	425.00

5/18/2016	Steve Cikes (A)	Attention to emails regarding Palo Alto discovery responses	3	425	0.50	212.50
5/19/2016	Steve Cikes (A)	Attention to emails regarding Richmond document production and review Richmond document production regarding same	3	425	0.50	212.50
6/17/2016	Steve Cikes (A)	Review IPP class certification opposition (2.0); prepare for and participate in conference call with S. Williams, D. Lambrinos and L. Williams regarding IPP class certification reply with regard to public entity subclass (0.5); follow up call with L. Weaver regarding same (0.2)	10	425	2.70	1,147.50
7/15/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert on public entity plaintiffs, conduct review of Palo Alto's document production and deposition transcripts and email exchange with D. Lambrinos regarding same	10	425	1.00	425.00
7/18/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert with regard to public entity plaintiffs	10	425	0.50	212.50
7/19/2016	Steve Cikes (A)	Attention to emails regarding deposition of defendants' expert on public entity plaintiffs, including review of talking points developed by M. Desai	10	425	0.50	212.50
7/22/2016	Steve Cikes (A)	Attention to emails regarding additional requests for information for Palo Alto relevant to class certification of public entity plaintiff subclass	10	425	0.50	212.50
7/29/2016	Steve Cikes (A)	Attention to emails regarding additional information needed from Palo Alto related to class certification of public entity plaintiff subclass and calls and email exchange with M. Desai and Palo Alto clients regarding same	3	425	1.00	425.00
11/29/2016	Louise Renne (P)	Confer with L. Weaver and S. Cikes regarding LG Chem settlement; attention to e-mail	12	650	0.20	130.00
11/29/2016	Steve Cikes (A)	Confer with L. Weaver and L. Renne regarding LG Chem settlement (0.2); review email from co-leads and settlement agreement regarding same (0.5); email to client regarding same (0.3)	12	425	0.50	212.50
12/16/2016	Steve Cikes (A)	Review email and draft settlement agreement from D. Lambrinos regarding Hitachi and Maxwell settlement	12	425	0.50	212.50

12/19/2016	Steve Cikes (A)	Confer with L. Weaver regarding Hitachi and Maxwell settlement (0.3); prepare email to Richmond and Palo Alto regarding same (0.5)	12	425	0.80	340.00
1/4/2017	Louise Renne	Attention to e-mail regarding NEC settlement	12	650	0.20	130.00
1/18/2017	Steve Cikes (A)	Review draft settlement agreement with NEC Corporation and email exchange with L. Weaver regarding same (1.0); email to Richmond and Palo Alto regarding same (0.5)	12	425	1.50	637.50
					284.90	123,629.50

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
RENNE SLOAN HOLZMAN SAKAI LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	$516.53
Miscellaneous	
TOTAL:	$516.53

EXHIBIT 54

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ALEXANDRA S. BERNAY IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES ON BEHALF OF ROBBINS GELLER RUDMAN & DOWD LLP**

I, Alexandra S. Bernay declare:

1. I am a member of Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My Firm has served as counsel to former named class representative David Beson and as counsel for IPPs throughout the course of this litigation. The background and experience of Robbins Geller and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Robbins Geller performed the following work: drafted the opposition to the motion to dismiss defendant NEC, conducted significant document review and coding of defendants' productions for use in depositions and in various pleadings including amended complaints, participated in weekly conference calls regarding discovery, produced discovery from plaintiff David Beson, including defending the deposition of Mr. Beson and answering interrogatories and discovery requests related to class certification.

5. A summary of work performed by the Firm and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Alexandra S. Bernay in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Robbins Geller Rudman & Dowd LLP; Exhibits C and E Submitted for In Camera Review Only ("Bernay Declaration") filed on May 26, 2017. (ECF No. 1813-33. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Robbins Geller from June 1, 2013 through February 28, 2017, was 623.40, with a corresponding lodestar based on then current rates is $254,521.50.

7. Attached hereto as Exhibit B is a summary of the expenses/charges Robbins Geller seeks from June 1, 2013 to present, plus applicable case filing fees, total $3,099.19 in connection with the prosecution of this case. These expenses/charges were on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and other records, and thus represent an accurate recordation.

8. I have reviewed the time and expenses reported maintained by my Firm in this case and I affirm that they are true and accurate.

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

Executed on March 26, 2019, at San Diego, California.

/s/ Alexandra S. Bernay
Alexandra S. Bernay

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

FIRM RESUME

Robbins Geller
Rudman & Dowd LLP

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INTRODUCTION

Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") is a 200-lawyer firm with offices in Atlanta, Boca Raton, Chicago, Manhattan, Melville, Nashville, San Diego, San Francisco, Philadelphia and Washington, D.C. (www.rgrdlaw.com). The Firm is actively engaged in complex litigation, emphasizing securities, consumer, antitrust, insurance, healthcare, human rights and employment discrimination class actions, as well as intellectual property disputes. The Firm's unparalleled experience and capabilities in these fields are based upon the talents of its attorneys, who have successfully prosecuted thousands of class action lawsuits and numerous individual cases, recovering billions of dollars.

This successful track record stems from our experienced attorneys, including many who came to the Firm from federal or state law enforcement agencies. The Firm also includes several dozen former federal and state judicial clerks.

The Firm is committed to practicing law with the highest level of integrity in an ethical and professional manner. We are a diverse firm with lawyers and staff from all walks of life. Our lawyers and other employees are hired and promoted based on the quality of their work and their ability to treat others with respect and dignity.

We strive to be good corporate citizens and work with a sense of global responsibility. Contributing to our communities and environment is important to us. We often take cases on a pro bono basis and are committed to the rights of workers, and to the extent possible, we contract with union vendors. We care about civil rights, workers' rights and treatment, workplace safety and environmental protection. Indeed, while we have built a reputation as the finest securities and consumer class action law firm in the nation, our lawyers have also worked tirelessly in less high-profile, but no less important, cases involving human rights and other social issues.

PRACTICE AREAS AND SERVICES

Securities Fraud

As recent corporate scandals demonstrate clearly, it has become all too common for companies and their executives – often with the help of their advisors, such as bankers, lawyers and accountants – to manipulate the market price of their securities by misleading the public about the company's financial condition or prospects for the future. This misleading information has the effect of artificially inflating the price of the company's securities above their true value. When the underlying truth is eventually revealed, the prices of these securities plummet, harming those innocent investors who relied upon the company's misrepresentations.

Robbins Geller is the leader in the fight to protect investors from corporate securities fraud. We utilize a wide range of federal and state laws to provide investors with remedies, either by bringing a class action on behalf of all affected investors or, where appropriate, by bringing individual cases.

The Firm's reputation for excellence has been repeatedly noted by courts and has resulted in the appointment of Firm attorneys to lead roles in hundreds of complex class-action securities and other cases. In the securities area alone, the Firm's attorneys have been responsible for a number of outstanding recoveries on behalf of investors. Currently, Robbins Geller attorneys are lead or named counsel in hundreds of securities class action or large institutional-investor cases. Some notable current and past cases include:

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest securities class action recovery in history***.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill.). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the seventh-largest settlement ever in a post-PSLRA securities fraud case.*** According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. The Firm obtained an $895 million recovery on behalf of the UnitedHealth shareholders, and former CEO William A. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders, bringing the total recovery for the class to over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a

shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a $500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). On behalf of investors in bonds and preferred securities issued between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company and Wachovia auditor KPMG LLP. ***The total settlement – $627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 20 largest securities class action recoveries in history***. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis. The lawsuit focused on Wachovia's exposure to "pick-a-pay" loans, which the bank's offering materials said were of "pristine credit quality," but which were actually allegedly made to subprime borrowers, and which ultimately massively impaired the bank's mortgage portfolio. Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors on behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund. At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit.

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***In re HealthSouth Corp. Sec. Litig.***, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer Inc. common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc. and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration

statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved approximately 70% of classwide damages, which as a percentage of damages significantly exceeds the median class action recovery of 2%-3% of damages.

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, one of the largest IPOs in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million.

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement.

- ***Nieman v. Duke Energy Corp.***, No. 3:12-cv-00456 (W.D.N.C.). Robbins Geller, along with co-counsel, obtained a $146.25 million settlement on behalf of Duke Energy Corporation investors. The settlement resolves accusations that defendants misled investors regarding Duke's future leadership following its merger with Progress Energy, Inc., and specifically, their premeditated coup to oust William D. Johnson (CEO of Progress) and replace him with Duke's then-CEO, John Rogers. This historic settlement represents the largest recovery ever in a North Carolina securities fraud action, and one of the five largest recoveries in the Fourth Circuit.

- ***Bennett v. Sprint Nextel Corp.***, No. 2:09-cv-02122 (D. Kan.). As co-lead counsel, Robbins Geller obtained a $131 million recovery for a class of Sprint investors. The settlement, secured after five years of hard-fought litigation, resolved claims that former Sprint executives misled investors concerning the success of Sprint's ill-advised merger with Nextel and the deteriorating credit quality of Sprint's customer base, artificially inflating the value of Sprint's securities.

- ***In re LendingClub Sec. Litig.***, No. 3:16-cv-02627 (N.D. Cal.). Robbins Geller attorneys obtained a $125 million settlement for the court-appointed lead plaintiff Water and Power Employees' Retirement, Disability and Death Plan of the City of Los Angeles and the class. The settlement resolved allegations that LendingClub promised investors an opportunity to get in on the ground floor of a revolutionary lending market fueled by the highest standards of honesty and integrity. The settlement ranks among the top ten largest securities recoveries ever in the Northern District of California.

- ***Marcus v. J.C. Penney Co., Inc.***, No. 13-cv-00736 (E.D. Tex.). Robbins Geller attorneys obtained a $97.5 million recovery on behalf of J.C. Penney shareholders. The result resolves claims that J.C. Penney and certain officers and directors made misstatements and/or omissions regarding the company's financial position that resulted in artificially inflated stock prices. Specifically, defendants failed to disclose and/or misrepresented adverse facts, including that J.C. Penney

would have insufficient liquidity to get through year-end and would require additional funds to make it through the holiday season, and that the company was concealing its need for liquidity so as not to add to its vendors' concerns.

- ***Luna v. Marvell Technology Group, Ltd.***, No. 3:15-cv-05447 (N.D. Cal.). In the Marvell litigation, Robbins Geller attorneys represented the Plumbers and Pipefitters National Pension Fund and obtained a $72.5 million settlement. The case involved claims that Marvell reported revenue and earnings during the class period that were misleading as a result of undisclosed pull-in and concession sales. The settlement represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors who purchased shares during the February 19, 2015 through December 7, 2015 class period.

- ***Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.***, No. 3:09-cv-00882 (M.D. Tenn.). In the *Psychiatric Solutions* case, Robbins Geller represented lead plaintiff and class representative Central States, Southeast and Southwest Areas Pension Fund in litigation spanning more than four years. Psychiatric Solutions and its top executives were accused of insufficiently staffing their in-patient hospitals, downplaying the significance of regulatory investigations and manipulating their malpractice reserves. Just days before trial was set to commence, attorneys from Robbins Geller achieved a $65 million settlement that was the third-largest securities recovery ever in the district and the largest in a decade.

- ***Plumbers & Pipefitters National Pension Fund v. Burns***, No. 3:05-cv-07393-JGC (N.D. Ohio). After 11 years of hard-fought litigation, Robbins Geller attorneys secured a $64 million recovery for shareholders in a case that accused the former heads of Dana Corp. of securities fraud for trumpeting the auto parts maker's condition while it actually spiraled toward bankruptcy. The Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

- ***In re St. Jude Med., Inc. Sec. Litig.***, No. 0:10-cv-00851 (D. Minn.). After four and one half years of litigation and mere weeks before the jury selection, Robbins Geller obtained a $50 million settlement on behalf of investors in medical device company St. Jude Medical. The settlement resolves accusations that St. Jude Medical misled investors by utilizing heavily discounted end-of-quarter bulk sales to meet quarterly expectations, which created a false picture of demand by increasing customer inventory due of St. Jude Medical devices. The complaint alleged that the risk of St. Jude Medical's reliance on such bulk sales manifested when it failed to meet its forecast guidance for the third quarter of 2009, which the company had reaffirmed only weeks earlier.

Robbins Geller's securities practice is also strengthened by the existence of a strong appellate department, whose collective work has established numerous legal precedents. The securities practice also utilizes an extensive group of in-house economic and damage analysts, investigators and forensic accountants to aid in the prosecution of complex securities issues.

Shareholder Derivative and Corporate Governance Litigation

The Firm's shareholder derivative and corporate governance practice is focused on preserving corporate assets and enhancing long-term shareowner value. Shareowner derivative actions are often brought by institutional investors to vindicate the rights of the corporation injured by its executives' misconduct, which can effect violations of the nation's securities, anti-corruption, false claims, cyber-security, labor, environmental and/or health & safety laws.

Robbins Geller attorneys have aided Firm clients in significantly enhancing shareowner value by obtaining hundreds of millions of dollars in financial clawbacks and successfully negotiating corporate governance enhancements. Robbins Geller has worked with its institutional clients to address corporate misconduct such as options backdating, bribery of foreign officials, pollution, off-label marketing, and insider trading and related self-dealing. Additionally, the Firm works closely with noted corporate governance consultants Robert Monks, Richard Bennett and their firm, ValueEdge Advisors LLC, to shape corporate governance practices that will benefit shareowners.

Robbins Geller's efforts have conferred substantial benefits upon shareowners, and the market effect of these benefits measures in the billions of dollars. The Firm's significant achievements include:

- ***City of Westland Police and Fire Retirement System v. Stumpf (Wells Fargo Derivative Litigation)***, No. 3:11-cv-02369 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Wells Fargo & Co. alleging that Wells Fargo's executives allowed participation in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, *i.e.*, the execution and submission of false legal documents in courts across the country without verification of their truth or accuracy, and failed to disclose Wells Fargo's lack of cooperation in a federal investigation into the bank's mortgage and foreclosure practices. In settlement of the action, Wells Fargo agreed to provide $67 million in homeowner down-payment assistance, credit counseling and improvements to its mortgage servicing system. The initiatives will be concentrated in cities severely impacted by the bank's foreclosure practices and the ensuing mortgage foreclosure crisis. Additionally, Wells Fargo agreed to change its procedures for reviewing shareholder proposals and a strict ban on stock pledges by Wells Fargo board members.

- ***In re Ormat Techs., Inc. Derivative Litig.***, No. CV10-00759 (Nev. Dist. Ct., Washoe Cty.). Robbins Geller brought derivative claims for breach of fiduciary duty and unjust enrichment against the directors and certain officers of Ormat Technologies, Inc., a leading geothermal and recovered energy power business. During the relevant time period, these Ormat insiders caused the company to engage in accounting manipulations that ultimately required restatement of the company's financial statements. The settlement in this action includes numerous corporate governance reforms designed to, among other things: (i) increase director independence; (ii) provide continuing education to directors; (iii) enhance the company's internal controls; (iv) make the company's board more independent; and (iv) strengthen the company's internal audit function.

- ***In re Alphatec Holdings, Inc. Derivative S'holder Litig.***, No. 37-2010-00058586 (Cal. Super. Ct., San Diego Cty.). Obtained sweeping changes to Alphatec's governance, including separation of the Chairman and CEO positions, enhanced conflict of interest procedures to address related-party transactions, rigorous director independence standards requiring that at least a majority of directors be outside independent directors, and ongoing director education and training.

- ***In re Finisar Corp. Derivative Litig.***, No. C-06-07660 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Finisar against certain of its current and former directors and officers for engaging in an alleged nearly decade-long stock option backdating scheme that was alleged to have inflicted substantial damage upon Finisar. After obtaining a reversal of the district court's order dismissing the complaint for failing to adequately allege that a pre-suit demand was futile, Robbins Geller lawyers successfully prosecuted the derivative claims to resolution obtaining over $15 million in financial clawbacks for Finisar. Robbins Geller attorneys also obtained significant changes to Finisar's stock option granting procedures and corporate governance. As a part of the settlement, Finisar agreed to ban the repricing of stock options without first obtaining specific shareholder approval, prohibit the retrospective selection of grant dates for stock options and similar awards, limit the number of other boards on which Finisar directors may serve,

require directors to own a minimum amount of Finisar shares, annually elect a Lead Independent Director whenever the position of Chairman and CEO are held by the same person, and require the board to appoint a Trading Compliance officer responsible for ensuring compliance with Finisar's insider trading policies.

- ***Loizides v. Schramm (Maxwell Technology Derivative Litigation)***, No. 37-2010-00097953 (Cal. Super. Ct., San Diego Cty.). Prosecuted shareholder derivative claims arising from the company's alleged violations of the Foreign Corrupt Practices Act of 1977 ("FCPA"). As a result of Robbins Geller's efforts, Maxwell insiders agreed to adopt significant changes in Maxwell's internal controls and systems designed to protect Maxwell against future potential violations of the FCPA. These corporate governance changes included, establishing the following, among other things: a compliance plan to improve board oversight of Maxwell's compliance processes and internal controls; a clear corporate policy prohibiting bribery and subcontracting kickbacks, whereby individuals are accountable; mandatory employee training requirements, including the comprehensive explanation of whistleblower provisions, to provide for confidential reporting of FCPA violations or other corruption; enhanced resources and internal control and compliance procedures for the audit committee to act quickly if an FCPA violation or other corruption is detected; an FCPA and Anti-Corruption Compliance department that has the authority and resources required to assess global operations and detect violations of the FCPA and other instances of corruption; a rigorous ethics and compliance program applicable to all directors, officers and employees, designed to prevent and detect violations of the FCPA and other applicable anti-corruption laws; an executive-level position of Chief Compliance Officer with direct board-level reporting responsibilities, who shall be responsible for overseeing and managing compliance issues within the company; a rigorous insider trading policy buttressed by enhanced review and supervision mechanisms and a requirement that all trades are timely disclosed; and enhanced provisions requiring that business entities are only acquired after thorough FCPA and anti-corruption due diligence by legal, accounting and compliance personnel at Maxwell.

- ***In re SciClone Pharm., Inc. S'holder Derivative Litig.***, No. CIV 499030 (Cal. Super. Ct., San Mateo Cty.). Robbins Geller attorneys successfully prosecuted the derivative claims on behalf of nominal party SciClone Pharmaceuticals, Inc., resulting in the adoption of state-of-the-art corporate governance reforms. The corporate governance reforms included the establishment of an FCPA compliance coordinator; the adoption of an FCPA compliance program and code; and the adoption of additional internal controls and compliance functions.

- ***Policemen & Firemen Ret. Sys. of the City of Detroit v. Cornelison (Halliburton Derivative Litigation)***, No. 2009-29987 (Tex. Dist. Ct., Harris Cty.). Prosecuted shareholder derivative claims on behalf of Halliburton Company against certain Halliburton insiders for breaches of fiduciary duty arising from Halliburton's alleged violations of the FCPA. In the settlement, Halliburton agreed, among other things, to adopt strict intensive controls and systems designed to detect and deter the payment of bribes and other improper payments to foreign officials, to enhanced executive compensation clawback, director stock ownership requirements, a limitation on the number of other boards that Halliburton directors may serve, a lead director charter, enhanced director independence standards, and the creation of a management compliance committee.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, our client, CalPERS, obtained sweeping corporate governance improvements, including the election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercises, as well as executive compensation reforms that tie pay to performance. In addition, the class obtained $925 million, the largest stock option backdating recovery ever and four times the next largest options backdating recovery.

- ***In re Fossil, Inc. Derivative Litig.***, No. 3:06-cv-01672 (N.D. Tex.). The settlement agreement included the following corporate governance changes: declassification of elected board members; retirement of three directors and addition of five new independent directors; two-thirds board independence requirements; corporate governance guidelines providing for "Majority Voting" election of directors; lead independent director requirements; revised accounting measurement dates of options; addition of standing finance committee; compensation clawbacks; director compensation standards; revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; enhanced education and training; and audit engagement partner rotation and outside audit firm review.

- ***Pirelli Armstrong Tire Corp. Retiree Med. Benefits Tr. v. Sinegal (Costco Derivative Litigation),*** No. 2:08-cv-01450 (W.D. Wash.). The parties agreed to settlement terms providing for the following corporate governance changes: the amendment of Costco's bylaws to provide "Majority Voting" election of directors; the elimination of overlapping compensation and audit committee membership on common subject matters; enhanced Dodd-Frank requirements; enhanced internal audit standards and controls, and revised information-sharing procedures; revised compensation policies and procedures; revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; and enhanced ethics compliance standards and training.

- ***In re F5 Networks, Inc. Derivative Litig.***, No. C-06-0794 (W.D. Wash.). The parties agreed to the following corporate governance changes as part of the settlement: revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; "Majority Voting" election of directors; lead independent director requirements; director independence standards; elimination of director perquisites; and revised compensation practices.

- ***In re Community Health Sys., Inc. S'holder Derivative Litig.***, No. 3:11-cv-00489 (M.D. Tenn.). Robbins Geller obtained unprecedented corporate governance reforms on behalf of Community Health Systems, Inc. in a case against the company's directors and officers for breaching their fiduciary duties by causing Community Health to develop and implement admissions criteria that systematically steered patients into unnecessary inpatient admissions, in contravention of Medicare and Medicaid regulations. The governance reforms obtained as part of the settlement include two shareholder-nominated directors, the creation of a Healthcare Law Compliance Coordinator with specified qualifications and duties, a requirement that the Board's Compensation Committee be comprised solely of independent directors, the implementation of a compensation clawback that will automatically recover compensation improperly paid to the company's CEO or CFO in the event of a restatement, the establishment of an insider trading controls committee, and the adoption of a political expenditure disclosure policy. In addition to these reforms, $60 million in financial relief was obtained, which is the largest shareholder derivative recovery ever in Tennessee and the Sixth Circuit.

Options Backdating Litigation

As has been widely reported in the media, the stock options backdating scandal suddenly engulfed hundreds of publicly traded companies throughout the country in 2006. Robbins Geller was at the forefront of investigating and prosecuting options backdating derivative and securities cases. The Firm has recovered over $1 billion in damages on behalf of injured companies and shareholders.

- ***In re KLA-Tencor Corp. S'holder Derivative Litig.***, No. C-06-03445 (N.D. Cal.). After successfully opposing the special litigation committee of the board of directors' motion to terminate the derivative claims, Robbins Geller recovered $43.6 million in direct financial benefits for KLATencor, including $33.2 million in cash payments by certain former executives and their directors' and officers' insurance carriers.

- ***In re Marvell Technology Grp. Ltd. Derivative Litig.***, No. C-06-03894 (N.D. Cal.). Robbins Geller recovered $54.9 million in financial benefits, including $14.6 million in cash, for Marvell, in addition to extensive corporate governance reforms related to Marvell's stock option granting practices, board of directors' procedures and executive compensation.

- ***In re KB Home S'holder Derivative Litig.***, No. 06-CV-05148 (C.D. Cal.). Robbins Geller served as co-lead counsel for the plaintiffs and recovered more than $31 million in financial benefits, including $21.5 million in cash, for KB Home, plus substantial corporate governance enhancements relating to KB Home's stock option granting practices, director elections and executive compensation practices.

Corporate Takeover Litigation

Robbins Geller has earned a reputation as the leading law firm in representing shareholders in corporate takeover litigation. Through its aggressive efforts in prosecuting corporate takeovers, the Firm has secured for shareholders billions of dollars of additional consideration as well as beneficial changes for shareholders in the context of mergers and acquisitions.

The Firm regularly prosecutes merger and acquisition cases post-merger, often through trial, to maximize the benefit for its shareholder class. Some of these cases include:

- ***In re Kinder Morgan, Inc. S'holders Litig.***, No. 06-C-801 (Kan. Dist. Ct., Shawnee Cty.). In the largest recovery ever for corporate takeover class action litigation, the Firm negotiated a settlement fund of $200 million in 2010.

- ***In re Dole Food Co., Inc. Stockholder Litig.***, No. 8703-VCL (Del. Ch.). Robbins Geller and co-counsel went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders. The litigation challenged the 2013 buyout of Dole by its billionaire Chief Executive Officer and Chairman, David H. Murdock. On August 27, 2015, the court issued a post-trial ruling that Murdock and fellow director C. Michael Carter – who also served as Dole's General Counsel, Chief Operating Officer and Murdock's top lieutenant – had engaged in fraud and other misconduct in connection with the buyout and are liable to Dole's former stockholders for over $148 million, the largest trial verdict ever in a class action challenging a merger transaction.

- ***In re Rural Metro Corp. Stockholders Litig.***, No. 6350-VCL (Del. Ch.). Robbins Geller and co-counsel were appointed lead counsel in this case after successfully objecting to an inadequate settlement that did not take into account evidence of defendants' conflicts of interest. In a post-trial opinion, Delaware Vice Chancellor J. Travis Laster found defendant RBC Capital Markets, LLC liable for aiding and abetting Rural/Metro's board of directors' fiduciary duty breaches in the $438 million buyout of Rural/Metro, citing "the magnitude of the conflict between RBC's claims and the evidence." RBC was ordered to pay nearly $110 million as a result of its wrongdoing, the largest damage award ever obtained against a bank over its role as a merger adviser. The Delaware Supreme Court issued a landmark opinion affirming the judgment on November 30, 2015, *RBC Capital Mkts., LLC v. Jervis*, 129 A.3d 816 (Del. 2015).

- ***In re Del Monte Foods Co. S'holders Litig.***, No. 6027-VCL (Del. Ch.). Robbins Geller exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. For efforts in achieving these results, the Robbins Geller lawyers prosecuting the case were named Attorneys of the Year by *California Lawyer* magazine in 2012.

- ***In re TD Banknorth S'holders Litig.***, No. 2557-VCL (Del. Ch.). After objecting to a modest recovery of just a few cents per share, the Firm took over the litigation and obtained a common fund settlement of $50 million.

- ***In re Chaparral Res., Inc. S'holders Litig.***, No. 2633-VCL (Del. Ch.). After a full trial and a subsequent mediation before the Delaware Chancellor, the Firm obtained a common fund settlement of $41 million (or 45% increase above merger price) for both class and appraisal claims.

- ***Laborers' Local #231 Pension Fund v. Websense, Inc.***, No. 37-2013-00050879-CU-BT-CTL (Cal. Super. Ct., San Diego Cty.). Robbins Geller successfully obtained a record-breaking $40 million in *Websense, Inc.*, which is believed to be the largest post-merger common fund settlement in California state court history. The class action challenged the May 2013 buyout of Websense by Vista Equity Partners (and affiliates) for $24.75 per share and alleged breach of fiduciary duty against the former Websense Board of Directors, and aiding and abetting against Websense's financial advisor, Merrill Lynch, Pierce, Fenner & Smith, Inc. Claims were pursued by the plaintiff in both California state court and the Delaware Court of Chancery.

- ***In re Onyx Pharm., Inc. S'holder Litig.***, No. CIV523789 (Cal. Super. Ct., San Mateo Cty.). Robbins Geller obtained $30 million in a case against the former Onyx Board of Directors for breaching its fiduciary duties in connection with the acquisition of Onyx by Amgen Inc. for $125 per share at the expense of shareholders. At the time of the settlement, it was believed to set the record for the largest post-merger common fund settlement in California state court history. Over the case's three years, Robbins Geller defeated defendants' motions to dismiss, obtained class certification, took over 20 depositions and reviewed over one million pages of documents. Further, the settlement was reached just days before a hearing on the defendants' motion for summary judgment was set to take place, and the result is now believed to be the second largest post-merger common fund settlement in California state court history.

- ***Harrah's Entertainment***, No. A529183 (Nev. Dist. Ct., Clark Cty.). The Firm's active prosecution of the case on several fronts, both in federal and state court, assisted Harrah's shareholders in securing an additional $1.65 billion in merger consideration.

- ***In re Chiron S'holder Deal Litig.***, No. RG 05-230567 (Cal. Super. Ct., Alameda Cty.). The Firm's efforts helped to obtain an additional $800 million in increased merger consideration for Chiron shareholders.

- ***In re Dollar Gen. Corp. S'holder Litig.***, No. 07MD-1 (Tenn. Cir. Ct., Davidson Cty.). As lead counsel, the Firm secured a recovery of up to $57 million in cash for former Dollar General shareholders on the eve of trial.

- ***In re Prime Hospitality, Inc. S'holders Litig.***, No. 652-N (Del. Ch.). The Firm objected to a settlement that was unfair to the class and proceeded to litigate breach of fiduciary duty issues involving a sale of hotels to a private equity firm. The litigation yielded a common fund of $25 million for shareholders.

- ***In re UnitedGlobalCom, Inc. S'holder Litig.***, No. 1012-VCS (Del. Ch.). The Firm secured a common fund settlement of $25 million just weeks before trial.

- ***In re eMachines, Inc. Merger Litig.***, No. 01-CC-00156 (Cal. Super. Ct., Orange Cty.). After four years of litigation, the Firm secured a common fund settlement of $24 million on the brink of trial.

- ***In re PeopleSoft, Inc. S'holder Litig.***, No. RG-03100291 (Cal. Super. Ct., Alameda Cty.). The Firm successfully objected to a proposed compromise of class claims arising from takeover defenses by PeopleSoft, Inc. to thwart an acquisition by Oracle Corp., resulting in shareholders receiving an increase of over $900 million in merger consideration.

- ***ACS S'holder Litig.***, No. CC-09-07377-C (Tex. Cty. Ct., Dallas Cty.). The Firm forced ACS's acquirer, Xerox, to make significant concessions by which shareholders would not be locked out of receiving more money from another buyer.

Insurance

Fraud and collusion in the insurance industry by executives, agents, brokers, lenders and others is one of the most costly crimes in the United States. Some experts have estimated the annual cost of white collar crime in the insurance industry to be over $120 billion nationally. Recent legislative proposals seek to curtail anti-competitive behavior within the industry. However, in the absence of comprehensive regulation, Robbins Geller has played a critical role as private attorney general in protecting the rights of consumers against insurance fraud and other unfair business practices within the insurance industry.

Robbins Geller attorneys have long been at the forefront of litigating race discrimination issues within the life insurance industry. For example, the Firm has fought the practice by certain insurers of charging African-Americans and other people of color more for life insurance than similarly situated Caucasians. The Firm recovered over $400 million for African-Americans and other minorities as redress for civil rights abuses, including landmark recoveries in *McNeil v. American General Life & Accident Insurance Company*; *Thompson v. Metropolitan Life Insurance Company*; and *Williams v. United Insurance Company of America*.

The Firm's attorneys fight on behalf of elderly victims targeted for the sale of deferred annuity products with hidden sales loads and illusory bonus features. Sales agents for life insurance companies such as Allianz Life Insurance Company of North America, Midland National Life Insurance Company, and National Western Life Insurance Company targeted senior citizens for these annuities with lengthy investment horizons and high sales commissions. The Firm recovered millions of dollars for elderly victims and seeks to ensure that senior citizens are afforded full and accurate information regarding deferred annuities.

Robbins Geller attorneys also stopped the fraudulent sale of life insurance policies based on misrepresentations about how the life insurance policy would perform, the costs of the policy, and whether premiums would "vanish." Purchasers were also misled about the financing of a new life insurance policy, falling victim to a "replacement" or "churning" sales scheme where they were convinced to use loans, partial surrenders or withdrawals of cash values from an existing permanent life insurance policy to purchase a new policy.

- **Brokerage "Pay to Play" Cases**. On behalf of individuals, governmental entities, businesses, and non-profits, Robbins Geller has sued the largest commercial and employee benefit insurance brokers and insurers for unfair and deceptive business practices. While purporting to provide independent, unbiased advice as to the best policy, the brokers failed to adequately disclose that

they had entered into separate "pay to play" agreements with certain third-party insurance companies. These agreements provide additional compensation to the brokers based on such factors as profitability, growth and the volume of insurance that they place with a particular insurer, and are akin to a profit-sharing arrangement between the brokers and the insurance companies. These agreements create a conflict of interest since the brokers have a direct financial interest in selling their customers only the insurance products offered by those insurance companies with which the brokers have such agreements.

Robbins Geller attorneys were among the first to uncover and pursue the allegations of these practices in the insurance industry in both state and federal courts. On behalf of the California Insurance Commissioner, the Firm brought an injunctive case against the biggest employee benefit insurers and local San Diego brokerage, ULR, which resulted in major changes to the way they did business. The Firm also sued on behalf of the City and County of San Francisco to recover losses due to these practices. Finally, Robbins Geller represents a putative nationwide class of individuals, businesses, employers, and governmental entities against the largest brokerage houses and insurers in the nation. To date, the Firm has obtained over $200 million on behalf of policyholders and enacted landmark business reforms.

- **Discriminatory Credit Scoring and Redlining Cases**. Robbins Geller attorneys have prosecuted cases concerning countrywide schemes of alleged discrimination carried out by Nationwide, Allstate, and other insurance companies against African-American and other persons of color who are purchasers of homeowner and automobile insurance policies. Such discrimination includes alleged redlining and the improper use of "credit scores," which disparately impact minority communities. Plaintiffs in these actions have alleged that the insurance companies' corporate-driven scheme of intentional racial discrimination includes refusing coverage and/or charging them higher premiums for homeowners and automobile insurance. On behalf of the class of aggrieved policyholders, the Firm has recovered over $400 million for these predatory and racist policies.

- **Senior Annuities**. Robbins Geller has prosecuted numerous cases against insurance companies and their agents who targeted senior citizens for the sale of deferred annuities. Plaintiffs alleged that the insurers misrepresented or failed to disclose to senior consumers material facts concerning the costs associated with their fixed and equity indexed deferred annuities and enticed seniors to buy the annuities by promising them illusory up-front bonuses. As a result of the Firm's efforts, hundreds of millions of dollars in economic relief has been made available to seniors who have been harmed by these practices. Notable recoveries include:

    - ***Negrete v. Allianz Life Ins. Co. of N. Am.***, No. CV-05-6838 (C.D. Cal.). Robbins Geller attorneys served as co-lead counsel on behalf of a nationwide RICO class consisting of over 200,000 senior citizens who had purchased deferred annuities issued by Allianz Life Insurance Company of North America. In March 2015, after nine years of litigation, District Judge Christina A. Snyder granted final approval of a class action settlement that made available in excess of $250 million in cash payments and other benefits to class members. In approving the settlement, the Court praised the effort of the Firm and noted that "counsel has represented their clients with great skill and they are to be complimented."

    - ***In re Am. Equity Annuity Practices & Sales Litig.***, No. CV-05-6735 (C.D. Cal.). As co-lead counsel, Robbins Geller attorneys secured a settlement that made available $129 million in economic benefits to a nationwide class of 114,000 senior citizens.

- ***In re Midland Nat'l Life Ins. Co. Annuity Sales Practices Litig.***, MDL No. 07-1825 (C.D. Cal.). After four years of litigation, the Firm secured a settlement that made available $79.5 million in economic benefits to a nationwide class of 70,000 senior citizens.

- ***Negrete v. Fidelity & Guar. Life Ins. Co.***, No. CV-05-6837 (C.D. Cal.). The Firm's efforts resulted in a settlement under which Fidelity made available $52.7 in benefits to 56,000 class members across the country.

- ***In re Nat'l Western Life Ins. Deferred Annuities Litig.***, No. 05-CV-1018 (S.D. Cal.). The Firm litigated this action for more than eight years. On the eve of trial, the Firm negotiated a settlement providing over $21 million in value to a nationwide class of 12,000 senior citizens.

Antitrust

Robbins Geller's antitrust practice focuses on representing businesses and individuals who have been the victims of price-fixing, unlawful monopolization, market allocation, tying and other anti-competitive conduct. The Firm has taken a leading role in many of the largest federal and state price-fixing, monopolization, market allocation and tying cases throughout the United States.

- ***In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation***, MDL No. 1720 (E.D.N.Y.). Robbins Geller attorneys, serving as co-lead counsel on behalf of merchants, have reached a $6.26 billion cash settlement with defendants in this antitrust litigation. Defendants have contributed additional funds to the class settlement fund that remains from the earlier settlement in 2012, which was approved by the district court in 2013 but was then reversed on appeal in 2016. The case is pending preliminary approval before the Honorable Margo K. Brodie in the Eastern District of New York.

- ***Dahl v. Bain Capital Partners, LLC***, No. 07-cv-12388-EFH (D. Mass). Robbins Geller attorneys served as co-lead counsel on behalf of shareholders in this antitrust action against the nation's largest private equity firms that colluded to restrain competition and suppress prices paid to shareholders of public companies in connection with leveraged buyouts. Robbins Geller attorneys recovered more than $590 million for the class from the private equity firm defendants, including Goldman Sachs Group Inc. and Carlyle Group LP.

- ***Alaska Elec. Pension Fund v. Bank of America Corp.***, No. 14-cv-07126-JMF (S.D.N.Y.). Robbins Geller attorneys prosecuted antitrust claims against 14 major banks and broker ICAP plc who were alleged to have conspired to manipulate the ISDAfix rate, the key interest rate for a broad range of interest rate derivatives and other financial instruments in contravention of the competition laws. The class action was brought on behalf of investors and market participants who entered into interest rate derivative transactions between 2006 and 2013. Final approval has been granted to settlements collectively yielding $504.5 million from all defendants.

- ***In re Currency Conversion Fee Antitrust Litig.***, 01 MDL No. 1409 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel and recovered $336 million for a class of credit and debit cardholders. The court praised the Firm as "indefatigable," noting that the Firm's lawyers "vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar."

- ***Sheet Metal Workers Pension Plan of Northern California v. Bank of America Corporation***, No.

1:16-cv-04603-ER (S.D.N.Y.). Robbins Geller attorneys are serving as co-lead counsel in a case against several of the world's largest banks and the traders of certain specialized government bonds. They are alleged to have entered into a wide-ranging price-fixing and bid-rigging scheme costing pension funds and other investors hundreds of millions. To date, two of the more than a dozen corporate defendants have settled for more than $65 million.

- ***In re Aftermarket Automotive Lighting Products Antitrust Litig.***, 09 MDL No. 2007 (C.D. Cal.). Robbins Geller attorneys are co-lead counsel in this multi-district litigation in which plaintiffs allege that defendants conspired to fix prices and allocate markets for automotive lighting products. The last defendants settled just before the scheduled trial, resulting in total settlements of more than $50 million. Commenting on the quality of representation, the court commended the Firm for "expend[ing] substantial and skilled time and efforts in an efficient manner to bring this action to conclusion."

- ***In re Dig. Music Antitrust Litig.***, 06 MDL No. 1780 (S.D.N.Y.). Robbins Geller attorneys are co-lead counsel in an action against the major music labels (Sony-BMG, EMI, Universal and Warner Music Group) in a case involving music that can be downloaded digitally from the Internet. Plaintiffs allege that defendants restrained the development of digital downloads and agreed to fix the distribution price of digital downloads at supracompetitive prices. Plaintiffs also allege that as a result of defendants' restraint of the development of digital downloads, and the market and price for downloads, defendants were able to maintain the prices of their CDs at supracompetitive levels. The Second Circuit Court of Appeals upheld plaintiffs' complaint, reversing the trial court's dismissal. Discovery is ongoing.

- ***In re Dynamic Random Access Memory (DRAM) Antitrust Litig.***, 02 MDL No. 1486 (N.D. Cal.). Robbins Geller attorneys served on the executive committee in this multi-district class action in which a class of purchasers of dynamic random access memory (or DRAM) chips alleged that the leading manufacturers of semiconductor products fixed the price of DRAM chips from the fall of 2001 through at least the end of June 2002. The case settled for more than $300 million.

- ***Microsoft I-V Cases***, JCCP No. 4106 (Cal. Super. Ct., San Francisco Cty.). Robbins Geller attorneys served on the executive committee in these consolidated cases in which California indirect purchasers challenged Microsoft's illegal exercise of monopoly power in the operating system, word processing and spreadsheet markets. In a settlement approved by the court, class counsel obtained an unprecedented $1.1 billion worth of relief for the business and consumer class members who purchased the Microsoft products.

Consumer Fraud

In our consumer-based economy, working families who purchase products and services must receive truthful information so they can make meaningful choices about how to spend their hard-earned money. When financial institutions and other corporations deceive consumers or take advantage of unequal bargaining power, class action suits provide, in many instances, the only realistic means for an individual to right a corporate wrong.

Robbins Geller attorneys represent consumers around the country in a variety of important, complex class actions. Our attorneys have taken a leading role in many of the largest federal and state consumer fraud, environmental, human rights and public health cases throughout the United States. The Firm is also actively involved in many cases relating to banks and the financial services industry, pursuing claims on behalf of individuals victimized by abusive telemarketing practices, abusive mortgage lending practices, market timing violations in the sale of variable annuities, and deceptive consumer credit lending practices

in violation of the Truth-In-Lending Act. Below are a few representative samples of our robust, nationwide consumer practice.

- ***In re Nat'l Prescription Opiate Litig.***, MDL No. 2804 (N.D. Ohio). Robbins Geller serves on the Plaintiffs' Executive Committee to spearhead more than 900 federal lawsuits brought on behalf of governmental entities and other plaintiffs in the sprawling litigation concerning the nationwide prescription opioid epidemic. In reporting on the selection of the lawyers to lead the case, *The National Law Journal* reported that "[t]he team reads like a 'Who's Who' in mass torts."

- ***Apple Inc. Device Performance Litigation***. Robbins Geller serves on the Plaintiffs' Executive Committee to advance judicial interests of efficiency and protect the interests of the proposed class in the *Apple Inc*. litigation. The case alleges Apple Inc. misrepresented its iPhone devices and the nature of updates to its mobile operating system (iOS), which allegedly included code that significantly reduced the performance of older-model iPhones and forced users to incur expenses replacing these devices or their batteries.

- ***In re Intel Corp. CPU Mktg., Sales Practices & Prods. Liab. Litig.***, No. 3:18-md-02828-SI (D. Or.). Robbins Geller serves on the Plaintiffs' Steering Committee in *Intel*, a massive multidistrict litigation pending in the United States District Court for the District of Oregon. *Intel* concerns serious security vulnerabilities – known as "Spectre" and "Meltdown" – that infect nearly all of Intel's x86 processors manufactured and sold since 1995, the patching of which results in processing speed degradation of the impacted computer, server or mobile device.

- ***Hauck v. Advanced Micro Devices, Inc.***, No. 18-CV-00447-LHK (N.D. Cal.). An attorney from Robbins Geller serves as co-lead counsel in a case against Advanced Micro Devices, Inc. ("AMD"), which alleges that AMD's processors are incapable of operating as intended and at processing speeds represented by AMD without exposing users to the Spectre vulnerability, which allows hackers to covertly access sensitive information stored within the CPU's kernel.

- ***In re Volkswagen "Clean Diesel" Mktg., Sales Practices, & Prods. Liab. Litig.***, No. 15-md-2672 (N.D. Cal.). As part of the Plaintiffs' Steering Committee, Robbins Geller reached a series of settlements on behalf of purchasers, lessees and dealers that total well over $17 billion, the largest settlement in history, concerning illegal "defeat devices" that Volkswagen installed on many of its diesel-engine vehicles. The device tricked regulators into believing the cars were complying with emissions standards, while the cars were actually emitting between 10 and 40 times the allowable limit for harmful pollutants.

- ***Trump University***. After six and half years of tireless litigation and on the eve of trial, Robbins Geller, serving as co-lead counsel, secured a historic recovery on behalf of Trump University students around the country. The settlement provides $25 million to approximately 7,000 consumers, including senior citizens who accessed retirement accounts and maxed out credit cards to enroll in Trump University. The extraordinary result means individual class members are eligible for upwards of $35,000 in restitution. The settlement resolves claims that President Donald J. Trump and Trump University violated federal and state laws by misleadingly marketing "Live Events" seminars and mentorships as teaching Trump's "real-estate techniques" through his "hand-picked" "professors" at his so-called "university." Robbins Geller represented the class on a *pro bono* basis.

- ***Bank Overdraft Fees Litigation***. The banking industry charges consumers exorbitant amounts for "overdraft" of their checking accounts, even if the customer did not authorize a charge beyond the

available balance and even if the account would not have been overdrawn had the transactions been ordered chronologically as they occurred – that is, banks reorder transactions to maximize such fees. The Firm brought lawsuits against major banks to stop this practice and recover these false fees. These cases have recovered over $500 million thus far from a dozen banks and we continue to investigate other banks engaging in this practice.

- ***Schwartz v. Visa Int'l***, No. 822404-4 (Cal. Super. Ct., Alameda Cty.). After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer-protection verdicts ever awarded in the United States. The Firm's attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***West Telemarketing Case***. Robbins Geller attorneys secured a $39 million settlement for class members caught up in a telemarketing scheme where consumers were charged for an unwanted membership program after purchasing Tae-Bo exercise videos. Under the settlement, consumers were entitled to claim between one and one-half to three times the amount of all fees they unknowingly paid.

- ***Dannon Activia®***. Robbins Geller attorneys secured the largest ever settlement for a false advertising case involving a food product. The case alleged that Dannon's advertising for its Activia® and DanActive® branded products and their benefits from "probiotic" bacteria were overstated. As part of the nationwide settlement, Dannon agreed to modify its advertising and establish a fund of up to $45 million to compensate consumers for their purchases of Activia® and DanActive®.

- ***Mattel Lead Paint Toys***. In 2006-2007, toy manufacturing giant Mattel and its subsidiary Fisher-Price announced the recall of over 14 million toys made in China due to hazardous lead and dangerous magnets. Robbins Geller attorneys filed lawsuits on behalf of millions of parents and other consumers who purchased or received toys for children that were marketed as safe but were later recalled because they were dangerous. The Firm's attorneys reached a landmark settlement for millions of dollars in refunds and lead testing reimbursements, as well as important testing requirements to ensure that Mattel's toys are safe for consumers in the future.

- ***Tenet Healthcare Cases***. Robbins Geller attorneys were co-lead counsel in a class action alleging a fraudulent scheme of corporate misconduct, resulting in the overcharging of uninsured patients by the Tenet chain of hospitals. The Firm's attorneys represented uninsured patients of Tenet hospitals nationwide who were overcharged by Tenet's admittedly "aggressive pricing strategy," which resulted in price gouging of the uninsured. The case was settled with Tenet changing its practices and making refunds to patients.

- ***Pet Food Products Liability Litigation***. Robbins Geller served as co-lead counsel in this massive, 100+ case products liability MDL in the District of New Jersey concerning the death of and injury to thousands of the nation's cats and dogs due to tainted pet food. The case settled for $24 million.

- ***In re Sony Gaming Networks & Customer Data Sec. Breach Litig.***, No. 3:11-md-2258-AJB (MDD) (S.D. Cal.). The Firm served as a member of the Plaintiffs' Steering Committee, helping to obtain a precedential opinion denying in part Sony's motion to dismiss plaintiffs' claims involving the breach of Sony's gaming network, leading to a pending $15 million settlement.

Intellectual Property

Individual inventors, universities, and research organizations provide the fundamental research behind many existing and emerging technologies. Every year, the majority of U.S. patents are issued to this group of inventors. Through this fundamental research, these inventors provide a significant competitive advantage to this country. Unfortunately, while responsible for most of the inventions that issue into U.S. patents every year, individual inventors, universities and research organizations receive very little of the licensing revenues for U.S. patents. Large companies reap 99% of all patent licensing revenues.

Robbins Geller enforces the rights of these inventors by filing and litigating patent infringement cases against infringing entities. Our attorneys have decades of patent litigation experience in a variety of technical applications. This experience, combined with the Firm's extensive resources, gives individual inventors the ability to enforce their patent rights against even the largest infringing companies.

Our attorneys have experience handling cases involving a broad range of technologies, including:

- biochemistry
- telecommunications
- medical devices
- medical diagnostics
- networking systems
- computer hardware devices and software
- mechanical devices
- video gaming technologies
- audio and video recording devices

Human Rights, Labor Practices and Public Policy

Robbins Geller attorneys have a long tradition of representing the victims of unfair labor practices and violations of human rights. These include:

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts at bringing about the precedent-setting settlement of the actions.

- ***Liberty Mutual Overtime Cases***, No. JCCP 4234 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller attorneys served as co-lead counsel on behalf of 1,600 current and former insurance claims adjusters at Liberty Mutual Insurance Company and several of its subsidiaries. Plaintiffs brought the case to recover unpaid overtime compensation and associated penalties, alleging that Liberty

Mutual had misclassified its claims adjusters as exempt from overtime under California law. After 13 years of complex and exhaustive litigation, Robbins Geller secured a settlement in which Liberty Mutual agreed to pay $65 million into a fund to compensate the class of claims adjusters for unpaid overtime. The Liberty Mutual action is one of a few claims adjuster overtime actions brought in California or elsewhere to result in a successful outcome for plaintiffs since 2004.

- ***Veliz v. Cintas Corp.***, No. 5:03-cv-01180 (N.D. Cal.). Brought against one of the nation's largest commercial laundries for violations of the Fair Labor Standards Act for misclassifying truck drivers as salesmen to avoid payment of overtime.

- ***Kasky v. Nike, Inc.***, 27 Cal. 4th 939 (2002). The California Supreme Court upheld claims that an apparel manufacturer misled the public regarding its exploitative labor practices, thereby violating California statutes prohibiting unfair competition and false advertising. The Court rejected defense contentions that any misconduct was protected by the First Amendment, finding the heightened constitutional protection afforded to noncommercial speech inappropriate in such a circumstance.

Shareholder derivative litigation brought by Robbins Geller attorneys at times also involves stopping anti-union activities, including:

- ***Southern Pacific/Overnite***. A shareholder action stemming from several hundred million dollars in loss of value in the company due to systematic violations by Overnite of U.S. labor laws.

- ***Massey Energy***. A shareholder action against an anti-union employer for flagrant violations of environmental laws resulting in multi-million-dollar penalties.

- ***Crown Petroleum***. A shareholder action against a Texas-based oil company for self-dealing and breach of fiduciary duty while also involved in a union lockout.

Environment and Public Health

Robbins Geller attorneys have also represented plaintiffs in class actions related to environmental law. The Firm's attorneys represented, on a *pro bono* basis, the Sierra Club and the National Economic Development and Law Center as *amici curiae* in a federal suit designed to uphold the federal and state use of project labor agreements ("PLAs"). The suit represented a legal challenge to President Bush's Executive Order 13202, which prohibits the use of project labor agreements on construction projects receiving federal funds. Our *amici* brief in the matter outlined and stressed the significant environmental and socio-economic benefits associated with the use of PLAs on large-scale construction projects.

Attorneys with Robbins Geller have been involved in several other significant environmental cases, including:

- ***Public Citizen v. U.S. D.O.T.*** Robbins Geller attorneys represented a coalition of labor, environmental, industry and public health organizations including Public Citizen, The International Brotherhood of Teamsters, California AFL-CIO and California Trucking Industry in a challenge to a decision by the Bush administration to lift a Congressionally-imposed "moratorium" on cross-border trucking from Mexico on the basis that such trucks do not conform to emission controls under the Clean Air Act, and further, that the administration did not first complete a comprehensive environmental impact analysis as required by the National Environmental Policy Act. The suit was dismissed by the United States Supreme Court, the Court holding that because the D.O.T. lacked discretion to prevent crossborder trucking, an environmental assessment was not required.

- ***Sierra Club v. AK Steel***. Brought on behalf of the Sierra Club for massive emissions of air and water pollution by a steel mill, including homes of workers living in the adjacent communities, in violation of the Federal Clean Air Act, Resource Conservation Recovery Act and the Clean Water Act.

- ***MTBE Litigation***. Brought on behalf of various water districts for befouling public drinking water with MTBE, a gasoline additive linked to cancer.

- ***Exxon Valdez***. Brought on behalf of fisherman and Alaska residents for billions of dollars in damages resulting from the greatest oil spill in U.S. history.

- ***Avila Beach***. A citizens' suit against UNOCAL for leakage from the oil company pipeline so severe it literally destroyed the town of Avila Beach, California.

Federal laws such as the Clean Water Act, the Clean Air Act, and the Resource Conservation and Recovery Act and state laws such as California's Proposition 65 exist to protect the environment and the public from abuses by corporate and government organizations. Companies can be found liable for negligence, trespass or intentional environmental damage, be forced to pay for reparations and to come into compliance with existing laws. Prominent cases litigated by Robbins Geller attorneys include representing more than 4,000 individuals suing for personal injury and property damage related to the Stringfellow Dump Site in Southern California, participation in the Exxon Valdez oil spill litigation, and litigation involving the toxic spill arising from a Southern Pacific train derailment near Dunsmuir, California.

Robbins Geller attorneys have led the fight against Big Tobacco since 1991. As an example, Robbins Geller attorneys filed the case that helped get rid of Joe Camel, representing various public and private plaintiffs, including the State of Arkansas, the general public in California, the cities of San Francisco, Los Angeles and Birmingham, 14 counties in California, and the working men and women of this country in the Union Pension and Welfare Fund cases that have been filed in 40 states. In 1992, Robbins Geller attorneys filed the first case in the country that alleged a conspiracy by the Big Tobacco companies.

Pro Bono

Robbins Geller provides counsel to those unable to afford legal representation as part of a continuous and longstanding commitment to the communities in which it serves. Over the years the Firm has dedicated a considerable amount of time, energy, and a full range of its resources for many pro bono and charitable actions.

Robbins Geller has been honored for its pro bono efforts by the California State Bar (including a

nomination for the President's Pro Bono Law Firm of the Year award) and the San Diego Volunteer Lawyer's Program, among others.

Some of the Firm's and its attorneys' pro bono and charitable actions include:

- Representing Trump University students in two class actions against President Donald J. Trump. The historic settlement provides $25 million to approximately 7,000 consumers. This means individual class members are eligible for upwards of $35,000 in restitution – an extraordinary result.

- Representing children diagnosed with Autism Spectrum Disorder, as well as children with significant disabilities, in New York to remedy flawed educational policies and practices that cause substantial harm to these and other similar children year after year.

- Representing 19 San Diego County children diagnosed with Autism Spectrum Disorder in their appeal of the San Diego Regional Center's termination of funding for a crucial therapy. The victory resulted in a complete reinstatement of funding and set a precedent that allows other children to obtain the treatments they need.

- Serving as Northern California and Hawaii District Coordinator for the United States Court of Appeals for the Ninth Circuit's Pro Bono program since 1993.

- Representing the Sierra Club and the National Economic Development and Law Center as *amici curiae* before the U.S. Supreme Court.

- Obtaining political asylum, after an initial application had been denied, for an impoverished Somali family whose ethnic minority faced systematic persecution and genocidal violence in Somalia, as well as forced female mutilation.

- Working with the ACLU in a class action filed on behalf of welfare applicants subject to San Diego County's "Project 100%" program. Relief was had when the County admitted that food-stamp eligibility could not hinge upon the Project 100% "home visits," and again when the district court ruled that unconsented "collateral contacts" violated state regulations. The decision was noted by the *Harvard Law Review*, *The New York Times* and *The Colbert Report*.

- Filing numerous *amicus curiae* briefs on behalf of religious organizations and clergy that support civil rights, oppose government-backed religious-viewpoint discrimination, and uphold the American traditions of religious freedom and church-state separation.

- Serving as *amicus* counsel in a Ninth Circuit appeal from a Board of Immigration Appeals deportation decision. In addition to obtaining a reversal of the BIA's deportation order, the Firm consulted with the Federal Defenders' Office on cases presenting similar fact patterns, which resulted in a precedent-setting *en banc* decision from the Ninth Circuit resolving a question of state and federal law that had been contested and conflicted for decades.

E-Discovery

Robbins Geller has successfully litigated some of the largest and most complex shareholder and antitrust actions in history and has become the vanguard of a rapidly evolving world of e-discovery in complex litigation. The Firm has 200 attorneys supported by a large staff of forensic and e-discovery specialists and has a level of technological sophistication that is unmatched by any other firm. As the size and stakes of complex litigation continue to increase, it is more important than ever to retain counsel with a successful track record of results. Robbins Geller has consistently proven to be the right choice for anyone seeking representation in actions against the largest corporations in the world.

Led by 20-year litigation veteran Tor Gronborg, and advised by Lea Bays, e-discovery counsel, and Christine Milliron, Director of E-Discovery and Litigation Support, the Robbins Geller e-discovery practice group is a multi-disciplinary team of attorneys, forensic analysts and database professionals. No plaintiffs' firm is better equipped to develop the type of comprehensive and case specific e-discovery strategy that is necessary for today's complex litigation. The attorneys have extensive knowledge and experience in drafting and negotiating sophisticated e-discovery protocols, including those involving the use of predictive coding. High quality document review services are performed by a consistent group of staff attorneys who are experienced in the Firm's litigation practice areas and specialize in document review and analysis. A team of forensic and technology professionals work closely with the attorneys to ensure an effective and efficient e-discovery strategy. The litigation support team includes six Relativity Certified Administrators. Collectively, the Robbins Geller forensic and technology professionals have more than 75 years of e-discovery experience.

Members of the practice group are also leaders in shaping the broader dialogue on e-discovery issues. They regularly contribute to industry publications, speak at conferences organized by leading e-discovery think tanks such as The Sedona Conference and Georgetown University Law Center's Advanced eDiscovery Institute, and play prominent roles in the local chapters of Women in eDiscovery and the Relativity Users Steering Committee. The e-discovery practice group also offers regular in-house training and education, ensuring that members of the Firm are always up-to-date on the evolving world of e-discovery law and technology.

Robbins Geller has always been a leader in document-intensive litigation. Boasting high-performing infrastructure resources, state-of-the-art technology, and a deep bench of some of the most highly trained Relativity Certified Administrators and network engineers, the Firm's capabilities rival, if not outshine, those of the top e-discovery vendors in the industry. Additionally, the Firm's implementation of advanced analytic technologies and custom workflows makes its work fast, smart and efficient. Combined with Robbins Geller's decision to manage and host its litigation support in-house, these technologies reduce the Firm's reliance on third-party vendors, enabling it to offer top-notch e-discovery services to clients at a fair and reasonable cost.

Security is a top priority at Robbins Geller. The Firm's hosted e-discovery is secured using bank-level 128 encryption and is protected behind state-of-the-art Cisco firewalls. All e-discovery data is hosted on Firm-owned equipment at an SSAE 16-compliant, SOC 1, 2, and 3 audited facility that features 9.1 megawatts of power, N+1 or better redundancy on all data center systems, and security protocols required by leading businesses in the most stringent verticals. Originally designed to support a large defense contractor, it is built to rigorous standards, complete with redundant power and cooling systems plus multiple generators.

PROMINENT CASES, PRECEDENT-SETTING DECISIONS AND JUDICIAL COMMENDATIONS

Prominent Cases

Over the years, Robbins Geller attorneys have obtained outstanding results in some of the most notorious and well-known cases, frequently earning judicial commendations for the quality of their representation.

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Investors lost billions of dollars as a result of the massive fraud at Enron. In appointing Robbins Geller lawyers as sole lead counsel to represent the interests of Enron investors, the court found that the Firm's zealous prosecution and level of "insight" set it apart from its peers. Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest securities class action recovery in history***.

  The court overseeing this action had utmost praise for Robbins Geller's efforts and stated that "[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country." *In re Enron Corp. Sec., Derivative & "ERISA" Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008).

  The court further commented: "[I]n the face of extraordinary obstacles, the skills, expertise, commitment, and tenacity of [Robbins Geller] in this litigation cannot be overstated. Not to be overlooked are the unparalleled results, . . . which demonstrate counsel's clearly superlative litigating and negotiating skills." *Id.* at 789.

  The court stated that the Firm's attorneys "are to be commended for their zealousness, their diligence, their perseverance, their creativity, the enormous breadth and depth of their investigations and analysis, and their expertise in all areas of securities law on behalf of the proposed class." *Id.*

  In addition, the court noted, "This Court considers [Robbins Geller] 'a lion' at the securities bar on the national level," noting that the Lead Plaintiff selected Robbins Geller because of the Firm's "outstanding reputation, experience, and success in securities litigation nationwide." *Id.* at 790.

  The court further stated that "Lead Counsel's fearsome reputation and successful track record undoubtedly were substantial factors in . . . obtaining these recoveries." *Id.*

  Finally, Judge Harmon stated: "As this Court has explained [this is] an extraordinary group of attorneys who achieved the largest settlement fund ever despite the great odds against them." *Id.* at 828.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of

damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the seventh-largest settlement ever in a post-PSLRA securities fraud case.*** According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

In approving the settlement, the Honorable Jorge L. Alonso noted the team's "skill and determination" while recognizing that "Lead Counsel prosecuted the case vigorously and skillfully over 14 years against nine of the country's most prominent law firms" and "achieved an exceptionally significant recovery for the class." The court added that the team faced "significant hurdles" and "uphill battles" throughout the case and recognized that "[c]lass counsel performed a very high-quality legal work in the context of a thorny case in which the state of the law has been and is in flux." The court succinctly concluded that the settlement was "a spectacular result for the class." *Jaffe v. Household Int'l, Inc.*, No. 02-C-5892, 2016 U.S. Dist. LEXIS 156921, at *8 (N.D. Ill. Nov. 10, 2016); *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893, Transcript at 56, 65 (N.D. Ill. Oct. 20, 2016).

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. For example, in 2006, the issue of high-level executives backdating stock options made national headlines. During that time, many law firms, including Robbins Geller, brought shareholder derivative lawsuits against the companies' boards of directors for breaches of their fiduciary duties or for improperly granting backdated options. Rather than pursuing a shareholder derivative case, the Firm filed a securities fraud class action against the company on behalf of CalPERS. In doing so, Robbins Geller faced significant and unprecedented legal obstacles with respect to loss causation, *i.e.*, that defendants' actions were responsible for causing the stock losses. Despite these legal hurdles, Robbins Geller obtained an $895 million recovery on behalf of the UnitedHealth shareholders. Shortly after reaching the $895 million settlement with UnitedHealth, the remaining corporate defendants, including former CEO William A. McGuire, also settled. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders. The total recovery for the class was over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's clients included major public institutions from across the country such as CalPERS, CalSTRS, the state pension funds of Maine, Illinois, New Mexico and West Virginia, union pension funds, and private entities such as AIG and Northwestern Mutual. Robbins Geller attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a

$500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

In approving the settlement, Judge Mariana R. Pfaelzer repeatedly complimented plaintiffs' attorneys, noting that it was "beyond serious dispute that Class Counsel has vigorously prosecuted the Settlement Actions on both the state and federal level over the last six years." Judge Pfaelzer also commented that "[w]ithout a settlement, these cases would continue indefinitely, resulting in significant risks to recovery and continued litigation costs. It is difficult to understate the risks to recovery if litigation had continued." *Me. State Ret. Sys. v. Countrywide Fin. Corp.*, No. 2:10-CV-00302, 2013 U.S. Dist. LEXIS 179190, at *44, *56 (C.D. Cal. Dec. 5, 2013).

Judge Pfaelzer further noted that the proposed $500 million settlement represents one of the "largest MBS class action settlements to date. Indeed, this settlement easily surpasses the next largest . . . MBS settlement." *Id.* at *59.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). In litigation over bonds and preferred securities, issued by Wachovia between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company ($590 million) and Wachovia auditor KPMG LLP ($37 million). ***The total settlement – $627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 20 largest securities class action recoveries in history***. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis.

  As alleged in the complaint, the offering materials for the bonds and preferred securities misstated and failed to disclose the true nature and quality of Wachovia's mortgage loan portfolio, which exposed the bank and misled investors to tens of billions of dollars in losses on mortgage-related assets. In reality, Wachovia employed high-risk underwriting standards and made loans to subprime borrowers, contrary to the offering materials and their statements of "pristine credit quality." Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors. On behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund, the Firm aggressively pursued class claims and won notable courtroom victories, including a favorable decision on defendants' motion to dismiss. *In re Cardinal Health, Inc. Sec. Litigs.*, 426 F. Supp. 2d 688 (S.D. Ohio 2006). At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit. Judge Marbley commented:

  > The quality of representation in this case was superb. Lead Counsel, [Robbins Geller], are nationally recognized leaders in complex securities litigation class actions. The quality of the representation is demonstrated by the substantial benefit achieved for the Class and the efficient, effective prosecution and resolution of this action. Lead Counsel defeated a volley of motions to dismiss, thwarting well-formed challenges from prominent and capable attorneys from six different law

firms.

In re Cardinal Health Inc. Sec. Litigs., 528 F. Supp. 2d 752, 768 (S.D. Ohio 2007).

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. Robbins Geller attorneys exposed a massive and sophisticated accounting fraud involving America Online's e-commerce and advertising revenue. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***Abu Dhabi Commercial Bank v. Morgan Stanley & Co.***, No. 1:08-cv-07508-SAS-DCF (S.D.N.Y.), and ***King County, Washington v. IKB Deutsche Industriebank AG***, No. 1:09-cv-08387-SAS (S.D.N.Y.). The Firm represented multiple institutional investors in successfully pursuing recoveries from two failed structured investment vehicles, each of which had been rated "AAA" by Standard & Poors and Moody's, but which failed fantastically in 2007. The matter settled just prior to trial in 2013. This result was only made possible after Robbins Geller lawyers beat back the rating agencies' longtime argument that ratings were opinions protected by the First Amendment.

- ***In re HealthSouth Corp. Sec. Litig.***, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA. HealthSouth and its financial advisors perpetrated one of the largest and most pervasive frauds in the history of U.S. healthcare, prompting Congressional and law enforcement inquiry and resulting in guilty pleas of 16 former HealthSouth executives in related federal criminal prosecutions. In March 2009, Judge Karon Bowdre commented in the *HealthSouth* class certification opinion: "The court has had many opportunities since November 2001 to examine the work of class counsel and the supervision by the Class Representatives. The court finds both to be far more than adequate." *In re HealthSouth Corp. Sec. Litig.*, 257 F.R.D. 260, 275 (N.D. Ala. 2009).

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc. and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Given Dynegy's limited ability to pay, Robbins Geller attorneys structured a settlement (reached shortly before the commencement of trial) that maximized plaintiffs' recovery without bankrupting the company. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer Inc. common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

  In approving the settlement, United States District Judge Alvin K. Hellerstein commended the Firm, noting that "[w]ithout the quality and the toughness that you have exhibited, our society would not be as good as it is with all its problems. So from me to you is a vote of thanks for devoting yourself to this work and doing it well. . . . You did a really good job. Congratulations."

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Qwest securities. In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation. In granting approval of the settlement, the court stated the following about Robbins Geller attorneys litigating the case: "[T]here is no question in my mind that this is a very good result for the class and that the plaintiffs' counsel fought the case very hard with extensive discovery, a lot of depositions, several rounds of briefing of various legal issues going all the way through class certification."

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

  In approving the settlement, the Honorable Loretta A. Preska of the Southern District of New York complimented Robbins Geller attorneys, noting:

> Counsel, thank you for your papers. They were, by the way, extraordinary papers in support of the settlement, and I will particularly note Professor Miller's declaration in which he details the procedural aspects of the case and then speaks of plaintiffs' counsel's success in the Second Circuit essentially changing the law.
>
> I will also note what counsel have said, and that is that this case illustrates the proper functioning of the statute.
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> * * *
>
> Counsel, you can all be proud of what you've done for your clients. You've done an extraordinarily good job.

NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co., No. 1:08-cv-10783, Transcript at 10-11 (S.D.N.Y. May 2, 2016).

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved approximately 70% of classwide damages, which as a percentage of damages significantly exceeds the median class action recovery of 2%-3% of damages. At the hearing on final approval of the settlement, the Honorable Kevin H. Sharp described Robbins Geller attorneys as "gladiators" and commented: "Looking at the benefit obtained, the effort that you had to put into it, [and] the complexity in this case . . . I appreciate the work that you all have done on this." *Schuh v. HCA Holdings, Inc.*, No. 3:11-CV-01033, Transcript at 12-13 (M.D. Tenn. Apr. 11, 2016).

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement. In May 2012, the Honorable Amy J. St. Eve of the Northern District of Illinois commented: "The representation that [Robbins Geller] provided to the class was significant, both in terms of quality and quantity." *Silverman v. Motorola, Inc.*, No. 07 C 4507, 2012 U.S. Dist. LEXIS 63477, at *11 (N.D. Ill. May 7, 2012), *aff'd*, 739 F.3d 956 (7th Cir. 2013).

  In affirming the district court's award of attorneys' fees, the Seventh Circuit noted that "no other law firm was willing to serve as lead counsel. Lack of competition not only implies a higher fee but also suggests that most members of the securities bar saw this litigation as too risky for their practices." *Silverman v. Motorola Sols., Inc.*, 739 F.3d 956, 958 (7th Cir. 2013).

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, one of the largest IPOs in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million. In granting approval of the settlement, the court stated the following about the Robbins Geller attorneys handling the case:

> Lead Counsel are highly skilled attorneys with great experience in prosecuting complex securities action[s], and their professionalism and diligence displayed during [this] litigation substantiates this characterization. The Court notes that Lead Counsel displayed excellent lawyering skills through their consistent preparedness during court proceedings, arguments and the trial, and their well-written and thoroughly researched submissions to the Court. Undoubtedly, the attentive and persistent effort of Lead Counsel was integral in achieving the excellent result for the Class.

In re AT&T Corp. Sec. Litig., MDL No. 1399, 2005 U.S. Dist. LEXIS 46144, at *28-*29 (D.N.J. Apr. 25, 2005), *aff'd*, 455 F.3d 160 (3d Cir. 2006).

- ***In re Dollar Gen. Corp. Sec. Litig.***, No. 01-CV-00388 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel in this case in which the Firm recovered $172.5 million for investors. The *Dollar General* settlement was the largest shareholder class action recovery ever in Tennessee.

- ***Carpenters Health & Welfare Fund v. Coca-Cola Co.***, No. 00-CV-2838 (N.D. Ga.). As co-lead counsel representing Coca-Cola shareholders, Robbins Geller attorneys obtained a recovery of $137.5 million after nearly eight years of litigation. Robbins Geller attorneys traveled to three continents to uncover the evidence that ultimately resulted in the settlement of this hard-fought litigation. The case concerned Coca-Cola's shipping of excess concentrate at the end of financial reporting periods for the sole purpose of meeting analyst earnings expectations, as well as the company's failure to properly account for certain impaired foreign bottling assets.

- ***Schwartz v. TXU Corp.***, No. 02-CV-2243 (N.D. Tex.). As co-lead counsel, Robbins Geller attorneys obtained a recovery of over $149 million for a class of purchasers of TXU securities. The recovery compensated class members for damages they incurred as a result of their purchases of TXU securities at inflated prices. Defendants had inflated the price of these securities by concealing the fact that TXU's operating earnings were declining due to a deteriorating gas pipeline and the failure of the company's European operations.

- ***In re Doral Fin. Corp. Sec. Litig.***, 05 MDL No. 1706 (S.D.N.Y.). In July 2007, the Honorable Richard Owen of the Southern District of New York approved the $129 million settlement, finding in his order:

> The services provided by Lead Counsel [Robbins Geller] were efficient and highly successful, resulting in an outstanding recovery for the Class without the substantial expense, risk and delay of continued litigation. Such efficiency and effectiveness supports the requested fee percentage.
>
> Cases brought under the federal securities laws are notably difficult and notoriously uncertain. . . . Despite the novelty and difficulty of the issues raised, Lead Plaintiffs' counsel secured an excellent result for the Class.
>
> . . . Based upon Lead Plaintiff's counsel's diligent efforts on behalf of the Class, as well as their skill and reputations, Lead Plaintiff's counsel were able to negotiate a very favorable result for the Class. . . . The ability of [Robbins Geller] to obtain such a favorable partial settlement for the Class in the face of such formidable opposition confirms the superior quality of their representation . . . .

In re Doral Fin. Corp. Sec. Litig., No. 1:05-md-01706, Order at 4-5 (S.D.N.Y. July 17, 2007).

- ***In re Exxon Valdez***, No. A89 095 Civ. (D. Alaska), and ***In re Exxon Valdez Oil Spill Litig.***, No. 3 AN 89 2533 (Alaska Super. Ct., 3d Jud. Dist.). Robbins Geller attorneys served on the Plaintiffs' Coordinating Committee and Plaintiffs' Law Committee in this massive litigation resulting from the Exxon Valdez oil spill in Alaska in March 1989. The jury awarded hundreds of millions in compensatory damages, as well as $5 billion in punitive damages (the latter were later reduced by the U.S. Supreme Court to $507 million).

- ***Mangini v. R.J. Reynolds Tobacco Co.***, No. 939359 (Cal. Super. Ct., San Francisco Cty.). In this case, R.J. Reynolds admitted that "the *Mangini* action, and the way that it was vigorously litigated, was an early, significant and unique driver of the overall legal and social controversy regarding underage smoking that led to the decision to phase out the Joe Camel Campaign."

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts in bringing about the precedent-setting settlement of the actions.

- ***Hall v. NCAA (Restricted Earnings Coach Antitrust Litigation)***, No. 94-2392 (D. Kan.). Robbins

Geller attorneys were lead counsel and lead trial counsel for one of three classes of coaches in these consolidated price-fixing actions against the National Collegiate Athletic Association. On May 4, 1998, the jury returned verdicts in favor of the three classes for more than $70 million.

- ***In re Prison Realty Sec. Litig.***, No. 3:99-0452 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel for the class, obtaining a $105 million recovery.

- ***In re Honeywell Int'l, Inc. Sec. Litig.***, No. 00-cv-03605 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Honeywell common stock. The case charged Honeywell and its top officers with violations of the federal securities laws, alleging the defendants made false public statements concerning Honeywell's merger with Allied Signal, Inc. and that defendants falsified Honeywell's financial statements. After extensive discovery, Robbins Geller attorneys obtained a $100 million settlement for the class.

- ***Schwartz v. Visa Int'l***, No. 822404-4 (Cal. Super. Ct., Alameda Cty.). After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer protection verdicts ever awarded in the United States. Robbins Geller attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from their cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***Thompson v. Metro. Life Ins. Co.***, No. 00-cv-5071 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel and obtained $145 million for the class in a settlement involving racial discrimination claims in the sale of life insurance.

- ***In re Prudential Ins. Co. of Am. Sales Practices Litig.***, MDL No. 1061 (D.N.J.). In one of the first cases of its kind, Robbins Geller attorneys obtained a settlement of $4 billion for deceptive sales practices in connection with the sale of life insurance involving the "vanishing premium" sales scheme.

Precedent-Setting Decisions

Robbins Geller attorneys operate at the vanguard of complex class action of litigation. Our work often changes the legal landscape, resulting in an environment that is more-favorable for obtaining recoveries for our clients.

- ***Alaska Electrical Pension Fund v. Asar***, No. 17-50162 (5th Cir.). In August 2018, Robbins Geller attorneys scored a significant win in the Fifth Circuit when the court ruled in favor of lead plaintiff, Alaska Electrical Pension Fund. Last January, the district court dismissed the case on the grounds that a strong inference of scienter had not been sufficiently pled. Working with Robbins Geller attorneys, the Pension Fund went above and beyond in an effort to protect the retirement savings of its thousands of hard-working participants and of the class that it represents by appealing the case to the Fifth Circuit after the district court's dismissal. Following appellate briefing and oral argument, the court reversed the dismissal, concluding that as to Hanger and its CFO, the case "support[s] a strong inference of scienter."

- ***Stoyas v. Toshiba Corporation***, No. 16-56058 (9th Cir.). In July 2018, the Ninth Circuit ruled in plaintiffs' favor in the *Toshiba Corporation* securities class action. Following appellate briefing and oral argument by Robbins Geller attorneys, a three-judge Ninth Circuit panel reversed the district court's prior dismissal in a unanimous, 36-page opinion, stating "that the Exchange Act could

apply to the Toshiba ADR transactions, as domestic transactions in securities [are] not registered on an exchange." Additionally, the court held that "Toshiba ADRs were 'securities' under the Exchange Act." In adopting the Second and Third Circuits' "irrevocable liability" test, the panel further concluded that "plaintiffs must be allowed to amend their complaint to allege that the purchase of Toshiba ADRs on the over-the-counter market was a domestic purchase, and that the alleged fraud was 'in connection with' the purchase."

- ***Cyan, Inc. v. Beaver County Employees Retirement Fund***, No. 15-1439 (U.S.). In March 2018, the Supreme Court ruled in favor of investors represented by Robbins Geller, holding that state courts continue to have jurisdiction over class actions asserting violations of the Securities Act of 1933. The Court's ruling secures investors' ability to bring 1933 Act actions when companies fail to make full and fair disclosure of relevant information in offering documents. The Court confirmed that the Securities Litigation Uniform Standards Act of 1998 was designed to preclude securities class actions asserting violations of state law – not to preclude securities actions asserting federal law violations brought in state courts.

- ***Mineworkers' Pension Scheme v. First Solar Inc.***, No. 15-17282 (9th Cir.). In January 2018, the Ninth Circuit upheld the district court's denial of defendants' motion for summary judgment, agreeing with plaintiffs that the test for loss causation in the Ninth Circuit is a general "proximate cause test," and rejecting the more stringent revelation of the fraudulent practices standard advocated by the defendants. The opinion is a significant victory for investors, as it forecloses defendants' ability to immunize themselves from liability simply by refusing to publicly acknowledge their fraudulent conduct.

- ***In re Quality Systems, Inc. Sec. Litig.***, No. 15-55173 (9th Cir.). In July 2017, Robbins Geller's Appellate Practice Group scored a significant win in the Ninth Circuit in the *Quality Systems* securities class action. On appeal, a three-judge Ninth Circuit panel unanimously reversed the district court's prior dismissal of the action against Quality Systems and remanded the case to the district court for further proceedings. The decision addressed an issue of first impression concerning "mixed" future and present-tense misstatements. The appellate panel explained that "non-forward-looking portions of mixed statements are not eligible for the safe harbor provisions of the PSLRA . . . . Defendants made a number of mixed statements that included projections of growth in revenue and earnings based on the state of QSI's sales pipeline." The panel then held *both* the non-forward-looking and forward-looking statements false and misleading and made with scienter, deeming them actionable. Later, although defendants sought rehearing by the Ninth Circuit sitting *en banc*, the circuit court denied their petition.

- ***Omnicare, Inc. v. Laborers District Council Construction Industry Pension Fund***, No. 13-435 (U.S.). In March 2015, the Supreme Court ruled in favor of investors represented by Robbins Geller that investors asserting a claim under §11 of the Securities Act of 1933 with respect to a misleading statement of opinion do not, as defendant Omnicare had contended, have to prove that the statement was subjectively disbelieved when made. Rather, the Court held that a statement of opinion may be actionable either because it was not believed, or because it lacked a reasonable basis in fact. This decision is significant in that it resolved a conflict among the federal circuit courts and expressly overruled the Second Circuit's widely followed, more stringent pleading standard for §11 claims involving statements of opinion. The Supreme Court remanded the case back to the district court for determination under the newly articulated standard. In August of 2016, upon remand, the district court applied the Supreme Court's new test and denied defendants' motion to dismiss in full.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, 693 F.3d 145 (2d Cir. 2012). In a securities fraud action involving mortgage-backed securities, the Second Circuit rejected the concept of "tranche" standing and found that a lead plaintiff has class standing to pursue claims on behalf of purchasers of securities that were backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities. The court noted that, given those common lenders, the lead plaintiff's claims as to its purchases implicated "the same set of concerns" that purchasers in several of the other offerings possessed. The court also rejected the notion that the lead plaintiff lacked standing to represent investors in different tranches.

- ***In re VeriFone Holdings, Inc. Sec. Litig.***, 704 F.3d 694 (9th Cir. 2012). The panel reversed in part and affirmed in part the dismissal of investors' securities fraud class action alleging violations of §§10(b), 20(a), and 20A of the Securities Exchange Act of 1934 and SEC Rule 10b-5 in connection with a restatement of financial results of the company in which the investors had purchased stock.

  The panel held that the third amended complaint adequately pleaded the §10(b), §20A and Rule 10b-5 claims. Considering the allegations of scienter holistically, as the U.S. Supreme Court directed in *Matrixx Initiatives, Inc. v. Siracusano*, 563 U.S 27, 48-49 (2011), the panel concluded that the inference that the defendant company and its chief executive officer and former chief financial officer were deliberately reckless as to the truth of their financial reports and related public statements following a merger was at least as compelling as any opposing inference.

- ***Fox v. JAMDAT Mobile, Inc.***, 185 Cal. App. 4th 1068 (2010). Concluding that Delaware's shareholder ratification doctrine did not bar the claims, the California Court of Appeal reversed dismissal of a shareholder class action alleging breach of fiduciary duty in a corporate merger.

- ***In re Constar Int'l Inc. Sec. Litig.***, 585 F.3d 774 (3d Cir. 2009). The Third Circuit flatly rejected defense contentions that where relief is sought under §11 of the Securities Act of 1933, which imposes liability when securities are issued pursuant to an incomplete or misleading registration statement, class certification should depend upon findings concerning market efficiency and loss causation.

- ***Matrixx Initiatives, Inc. v. Siracusano***, 563 U.S 27 (2011), *aff'g* 585 F.3d 1167 (9th Cir. 2009). In a securities fraud action involving the defendants' failure to disclose a possible link between the company's popular cold remedy and a life-altering side effect observed in some users, the U.S. Supreme Court unanimously affirmed the Ninth Circuit's (a) rejection of a bright-line "statistical significance" materiality standard, and (b) holding that plaintiffs had successfully pleaded a strong inference of the defendants' scienter.

- ***Alaska Elec. Pension Fund v. Flowserve Corp.***, 572 F.3d 221 (5th Cir. 2009). Aided by former U.S. Supreme Court Justice O'Connor's presence on the panel, the Fifth Circuit reversed a district court order denying class certification and also reversed an order granting summary judgment to defendants. The court held that the district court applied an incorrect fact-for-fact standard of loss causation, and that genuine issues of fact on loss causation precluded summary judgment.

- ***In re F5 Networks, Inc., Derivative Litig.***, 207 P.3d 433 (Wash. 2009). In a derivative action alleging unlawful stock option backdating, the Supreme Court of Washington ruled that shareholders need not make a pre-suit demand on the board of directors where this step would be futile, agreeing with plaintiffs that favorable Delaware case law should be followed as persuasive authority.

- ***Lormand v. US Unwired, Inc.***, 565 F.3d 228 (5th Cir. 2009). In a rare win for investors in the Fifth Circuit, the court reversed an order of dismissal, holding that safe harbor warnings were not meaningful when the facts alleged established a strong inference that defendants knew their forecasts were false. The court also held that plaintiffs sufficiently alleged loss causation.

- ***Institutional Inv'rs Grp. v. Avaya, Inc.***, 564 F.3d 242 (3d Cir. 2009). In a victory for investors in the Third Circuit, the court reversed an order of dismissal, holding that shareholders pled with particularity why the company's repeated denials of price discounts on products were false and misleading when the totality of facts alleged established a strong inference that defendants knew their denials were false.

- ***Alaska Elec. Pension Fund v. Pharmacia Corp.***, 554 F.3d 342 (3d Cir. 2009). The Third Circuit held that claims filed for violation of §10(b) of the Securities Exchange Act of 1934 were timely, adopting investors' argument that because scienter is a critical element of the claims, the time for filing them cannot begin to run until the defendants' fraudulent state of mind should be apparent.

- ***Rael v. Page***, 222 P.3d 678 (N.M. Ct. App. 2009). In this shareholder class and derivative action, Robbins Geller attorneys obtained an appellate decision reversing the trial court's dismissal of the complaint alleging serious director misconduct in connection with the merger of SunCal Companies and Westland Development Co., Inc., a New Mexico company with large and historic landholdings and other assets in the Albuquerque area. The appellate court held that plaintiff's claims for breach of fiduciary duty were direct, not derivative, because they constituted an attack on the validity or fairness of the merger and the conduct of the directors. Although New Mexico law had not addressed this question directly, at the urging of the Firm's attorneys, the court relied on Delaware law for guidance, rejecting the "special injury" test for determining the direct versus derivative inquiry and instead applying more recent Delaware case law.

- ***Lane v. Page***, No. 06-cv-1071 (D.N.M. 2012). In May 2012, while granting final approval of the settlement in the federal component of the Westland cases, Judge Browning in the District of New Mexico commented:

> Class Counsel are highly skilled and specialized attorneys who use their substantial experience and expertise to prosecute complex securities class actions. In possibly one of the best known and most prominent recent securities cases, Robbins Geller served as sole lead counsel – *In re Enron Corp. Sec. Litig.*, No. H-01-3624 (S.D. Tex.). *See* Report at 3. The Court has previously noted that the class would "receive high caliber legal representation" from class counsel, and throughout the course of the litigation the Court has been impressed with the quality of representation on each side. *Lane v. Page*, 250 F.R.D. at 647.

Lane v. Page, 862 F. Supp. 2d 1182, 1253-54 (D.N.M. 2012).

In addition, Judge Browning stated, "'Few plaintiffs' law firms could have devoted the kind of time, skill, and financial resources over a five-year period necessary to achieve the pre- and post-Merger benefits obtained for the class here.' . . . [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class." *Id.* at 1254.

- ***Luther v. Countrywide Home Loans Servicing LP***, 533 F.3d 1031 (9th Cir. 2008). In a case of first impression, the Ninth Circuit held that the Securities Act of 1933's specific non-removal features had not been trumped by the general removal provisions of the Class Action Fairness Act of 2005.

- ***In re Gilead Scis. Sec. Litig.***, 536 F.3d 1049 (9th Cir. 2008). The Ninth Circuit upheld defrauded investors' loss causation theory as plausible, ruling that a limited temporal gap between the time defendants' misrepresentation was publicly revealed and the subsequent decline in stock value was reasonable where the public had not immediately understood the impact of defendants' fraud.

- ***In re WorldCom Sec. Litig.***, 496 F.3d 245 (2d Cir. 2007). The Second Circuit held that the filing of a class action complaint tolls the limitations period for all members of the class, including those who choose to opt out of the class action and file their own individual actions without waiting to see whether the district court certifies a class – reversing the decision below and effectively overruling multiple district court rulings that *American Pipe* tolling did not apply under these circumstances.

- ***In re Merck & Co. Sec., Derivative & ERISA Litig.***, 493 F.3d 393 (3d Cir. 2007). In a shareholder derivative suit appeal, the Third Circuit held that the general rule that discovery may not be used to supplement demand-futility allegations does not apply where the defendants enter a voluntary stipulation to produce materials relevant to demand futility without providing for any limitation as to their use. In April 2007, the Honorable D. Brooks Smith praised Robbins Geller partner Joe Daley's efforts in this litigation:

  > Thank you very much Mr. Daley and a thank you to all counsel. As Judge Cowen mentioned, this was an exquisitely well-briefed case; it was also an extremely well-argued case, and we thank counsel for their respective jobs here in the matter, which we will take under advisement. Thank you.

  In re Merck & Co., Inc. Sec., Derivative & ERISA Litig., No. 06-2911, Transcript at 35:37-36:00 (3d Cir. Apr. 12, 2007).

- ***Alaska Elec. Pension Fund v. Brown***, 941 A.2d 1011 (Del. 2007). The Supreme Court of Delaware held that the Alaska Electrical Pension Fund, for purposes of the "corporate benefit" attorney-fee doctrine, was presumed to have caused a substantial increase in the tender offer price paid in a "going private" buyout transaction. The Court of Chancery originally ruled that Alaska's counsel, Robbins Geller, was not entitled to an award of attorney fees, but Delaware's high court, in its published opinion, reversed and remanded for further proceedings.

- ***Crandon Capital Partners v. Shelk***, 157 P.3d 176 (Or. 2007). Oregon's Supreme Court ruled that a shareholder plaintiff in a derivative action may still seek attorney fees even if the defendants took actions to moot the underlying claims. The Firm's attorneys convinced Oregon's highest court to take the case, and reverse, despite the contrary position articulated by both the trial court and the Oregon Court of Appeals.

- ***In re Qwest Commc'ns Int'l***, 450 F.3d 1179 (10th Cir. 2006). In a case of first impression, the Tenth Circuit held that a corporation's deliberate release of purportedly privileged materials to governmental agencies was not a "selective waiver" of the privileges such that the corporation could refuse to produce the same materials to non-governmental plaintiffs in private securities fraud litigation.

- ***In re Guidant S'holders Derivative Litig.***, 841 N.E.2d 571 (Ind. 2006). Answering a certified question from a federal court, the Supreme Court of Indiana unanimously held that a pre-suit demand in a derivative action is excused if the demand would be a futile gesture. The court adopted a "demand futility" standard and rejected defendants' call for a "universal demand" standard that might have immediately ended the case.

- ***Denver Area Meat Cutters v. Clayton***, 209 S.W.3d 584 (Tenn. Ct. App. 2006). The Tennessee Court of Appeals rejected an objector's challenge to a class action settlement arising out of Warren Buffet's 2003 acquisition of Tennessee-based Clayton Homes. In their effort to secure relief for Clayton Homes stockholders, the Firm's attorneys obtained a temporary injunction of the Buffet acquisition for six weeks in 2003 while the matter was litigated in the courts. The temporary halt to Buffet's acquisition received national press attention.

- ***DeJulius v. New Eng. Health Care Emps. Pension Fund***, 429 F.3d 935 (10th Cir. 2005). The Tenth Circuit held that the multi-faceted notice of a $50 million settlement in a securities fraud class action had been the best notice practicable under the circumstances, and thus satisfied both constitutional due process and Rule 23 of the Federal Rules of Civil Procedure.

- ***In re Daou Sys.***, 411 F.3d 1006 (9th Cir. 2005). The Ninth Circuit sustained investors' allegations of accounting fraud and ruled that loss causation was adequately alleged by pleading that the value of the stock they purchased declined when the issuer's true financial condition was revealed.

- ***Barrie v. Intervoice-Brite, Inc.***, 397 F.3d 249 (5th Cir.), *reh'g denied and opinion modified*, 409 F.3d 653 (5th Cir. 2005). The Fifth Circuit upheld investors' accounting-fraud claims, holding that fraud is pled as to both defendants when one knowingly utters a false statement and the other knowingly fails to correct it, even if the complaint does not specify who spoke and who listened.

- ***City of Monroe Emps. Ret. Sys. v. Bridgestone Corp.***, 399 F.3d 651 (6th Cir. 2005). The Sixth Circuit held that a statement regarding objective data supposedly supporting a corporation's belief that its tires were safe was actionable where jurors could have found a reasonable basis to believe the corporation was aware of undisclosed facts seriously undermining the statement's accuracy.

- ***Ill. Mun. Ret. Fund v. Citigroup, Inc.***, 391 F.3d 844 (7th Cir. 2004). The Seventh Circuit upheld a district court's decision that the Illinois Municipal Retirement Fund was entitled to litigate its claims under the Securities Act of 1933 against WorldCom's underwriters before a state court rather than before the federal forum sought by the defendants.

- ***Nursing Home Pension Fund, Local 144 v. Oracle Corp.***, 380 F.3d 1226 (9th Cir. 2004). The Ninth Circuit ruled that defendants' fraudulent intent could be inferred from allegations concerning their false representations, insider stock sales and improper accounting methods.

- ***Southland Sec. Corp. v. INSpire Ins. Sols. Inc.***, 365 F.3d 353 (5th Cir. 2004). The Fifth Circuit sustained allegations that an issuer's CEO made fraudulent statements in connection with a contract announcement.

- ***Smith v. Am. Family Mut. Ins. Co.***, 289 S.W.3d 675 (Mo. Ct. App. 2009). Capping nearly a decade of hotly contested litigation, the Missouri Court of Appeals reversed the trial court's judgment notwithstanding the verdict for auto insurer American Family and reinstated a unanimous jury verdict for the plaintiff class.

- ***Troyk v. Farmers Grp., Inc.***, 171 Cal. App. 4th 1305 (2009). The California Court of Appeal held that Farmers Insurance's practice of levying a "service charge" on one-month auto insurance policies, without specifying the charge in the policy, violated California's Insurance Code.

- ***Lebrilla v. Farmers Grp., Inc.***, 119 Cal. App. 4th 1070 (2004). Reversing the trial court, the California Court of Appeal ordered class certification of a suit against Farmers, one of the largest automobile insurers in California, and ruled that Farmers' standard automobile policy requires it to provide parts that are as good as those made by vehicle's manufacturer. The case involved Farmers' practice of using inferior imitation parts when repairing insureds' vehicles.

- ***In re Monumental Life Ins. Co.***, 365 F.3d 408, 416 (5th Cir. 2004). The Fifth Circuit Court of Appeals reversed a district court's denial of class certification in a case filed by African-Americans seeking to remedy racially discriminatory insurance practices. The Fifth Circuit held that a monetary relief claim is viable in a Rule 23(b)(2) class if it flows directly from liability to the class as a whole and is capable of classwide "'computation by means of objective standards and not dependent in any significant way on the intangible, subjective differences of each class member's circumstances.'"

- ***Dent, et al. v. National Football League***, No. 15-15143 (9th Cir.). In September 2018, the United States Court of Appeals for the Ninth Circuit issued an important decision reversing the district court's previous dismissal of the *Dent v. National Football League* litigation, concluding that the complaint brought by NFL Hall of Famer Richard Dent and others should not be dismissed on labor-law preemption grounds. The case was remanded to the district court for further proceedings.

- ***Kwikset Corp. v. Superior Court***, 51 Cal. 4th 310 (2011). In a leading decision interpreting the scope of Proposition 64's new standing requirements under California's Unfair Competition Law (UCL), the California Supreme Court held that consumers alleging that a manufacturer has misrepresented its product have "lost money or property" within the meaning of the initiative, and thus have standing to sue under the UCL, if they "can truthfully allege that they were deceived by a product's label into spending money to purchase the product, and would not have purchased it otherwise." *Id*. at 317. *Kwikset* involved allegations, proven at trial, that defendants violated California's "Made in the U.S.A." statute by representing on their labels that their products were "Made in U.S.A." or "All-American Made" when, in fact, the products were substantially made with foreign parts and labor.

- ***Safeco Ins. Co. of Am. v. Superior Court***, 173 Cal. App. 4th 814 (2009). In a class action against auto insurer Safeco, the California Court of Appeal agreed that the plaintiff should have access to discovery to identify a new class representative after her standing to sue was challenged.

- ***Consumer Privacy Cases***, 175 Cal. App. 4th 545 (2009). The California Court of Appeal rejected objections to a nationwide class action settlement benefiting Bank of America customers.

- ***Koponen v. Pac. Gas & Elec. Co.***, 165 Cal. App. 4th 345 (2008). The Firm's attorneys obtained a published decision reversing the trial court's dismissal of the action, and holding that the plaintiff's claims for damages arising from the utility's unauthorized use of rights-of-way or easements obtained from the plaintiff and other landowners were not barred by a statute limiting the authority of California courts to review or correct decisions of the California Public Utilities Commission.

- ***Sanford v. MemberWorks, Inc.***, 483 F.3d 956 (9th Cir. 2007). In a telemarketing-fraud case, where the plaintiff consumer insisted she had never entered the contractual arrangement that defendants said bound her to arbitrate individual claims to the exclusion of pursuing class claims, the Ninth Circuit reversed an order compelling arbitration – allowing the plaintiff to litigate on behalf of a class.

- ***Ritt v. Billy Blanks Enters.***, 870 N.E.2d 212 (Ohio Ct. App. 2007). In the Ohio analog to the *West* case, the Ohio Court of Appeals approved certification of a class of Ohio residents seeking relief under Ohio's consumer protection laws for the same telemarketing fraud.

- ***Haw. Med. Ass'n v. Haw. Med. Serv. Ass'n***, 148 P.3d 1179 (Haw. 2006). The Supreme Court of Hawaii ruled that claims of unfair competition were not subject to arbitration and that claims of tortious interference with prospective economic advantage were adequately alleged.

- ***Branick v. Downey Sav. & Loan Ass'n***, 39 Cal. 4th 235 (2006). Robbins Geller attorneys were part of a team of lawyers that briefed this case before the Supreme Court of California. The court issued a unanimous decision holding that new plaintiffs may be substituted, if necessary, to preserve actions pending when Proposition 64 was passed by California voters in 2004. Proposition 64 amended California's Unfair Competition Law and was aggressively cited by defense lawyers in an effort to dismiss cases after the initiative was adopted.

- ***McKell v. Wash. Mut., Inc.***, 142 Cal. App. 4th 1457 (2006). The California Court of Appeal reversed the trial court, holding that plaintiff's theories attacking a variety of allegedly inflated mortgage-related fees were actionable.

- ***West Corp. v. Superior Court***, 116 Cal. App. 4th 1167 (2004). The California Court of Appeal upheld the trial court's finding that jurisdiction in California was appropriate over the out-of-state corporate defendant whose telemarketing was aimed at California residents. Exercise of jurisdiction was found to be in keeping with considerations of fair play and substantial justice.

- ***Kruse v. Wells Fargo Home Mortg., Inc.***, 383 F.3d 49 (2d Cir. 2004), and ***Santiago v. GMAC Mortg. Grp., Inc.***, 417 F.3d 384 (3d Cir. 2005). In two groundbreaking federal appellate decisions, the Second and Third Circuits each ruled that the Real Estate Settlement Practices Act prohibits marking up home loan-related fees and charges.

Additional Judicial Commendations

Robbins Geller attorneys have been praised by countless judges all over the country for the quality of their representation in class-action lawsuits. In addition to the judicial commendations set forth in the Prominent Cases and Precedent-Setting Decisions sections, judges have acknowledged the successful results of the Firm and its attorneys with the following plaudits:

- On December 20, 2018, at the final approval hearing for the settlement, the court lauded Robbins Geller's attorneys and their work: "I've been very impressed with the level of lawyering in the case . . . and with the level of briefing . . . and I wanted to express my appreciation for that and for the work that everyone has done here." The court concluded, "your clients were all blessed to have you, [and] not just because of the outcome." *Duncan v. Joy Global, Inc.*, No. 16-CV-1229, Transcript at 20-21 (E.D. Wis. Dec. 20, 2018).

- On November 9, 2018, in granting final approval of the settlement, the Honorable Jesse M. Furman commented: "[Robbins Geller] did an extraordinary job here. . . . [I]t is fair to say [this was] probably the most complicated case I have had since I have been on the bench. . . . I cannot really imagine how complicated it would have been if I didn't have counsel who had done as admirable [a] job in briefing it and arguing as you have done. You have in my view done an extraordinary service to the class. . . . I think you have done an extraordinary job and deserve thanks and commendation for that." *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 1:14-cv-07126-JMF-OTW, Transcript at 27-28 (S.D.N.Y. Nov. 9, 2018).

- On September 12, 2018, at the final approval hearing of the settlement, the Honorable William H. Orrick of the Northern District of California praised Robbins Geller's "high-quality lawyering" in a case that "involved complicated discovery and complicated and novel legal issues," resulting in an "excellent" settlement for the class. The "lawyering . . . was excellent" and the case was "very well litigated." *In re Lidoderm Antitrust Litig.*, No. 14-MDL-02521-WHO, Transcript at 11, 14, 22 (N.D. Cal. Sept. 12, 2018).

- On March 31, 2017, in granting final approval of the settlement, the Honorable Gonzalo P. Curiel hailed the settlement as "extraordinary" and "all the more exceptional when viewed in light of the risk" of continued litigation. The court further commended Robbins Geller for prosecuting the case on a *pro bono* basis: "Class Counsel's exceptional decision to provide nearly seven years of legal services to Class Members on a *pro bono* basis evidences not only a lack of collusion, but also that Class Counsel are in fact representing the best interests of Plaintiffs and the Class Members in this Settlement. Instead of seeking compensation for fees and costs that they would otherwise be entitled to, Class Counsel have acted to allow maximum recovery to Plaintiffs and Class Members. Indeed, that Eligible Class Members may receive recovery of 90% or greater is a testament to Class Counsel's representation and dedication to act in their clients' best interest." In addition, at the final approval hearing, the court commented that "this is a case that has been litigated – if not fiercely, zealously throughout." *Low v. Trump Univ., LLC*, 246 F. Supp. 3d 1295, 1302, 1312 (S.D. Cal. 2017); *Low v. Trump University LLC and Donald J. Trump*, No. 10-cv-0940 GPC-WVG, and *Cohen v. Donald J. Trump*, No. 13-cv-2519-GPC-WVG, Transcript at 7 (S.D. Cal. Mar. 30, 2017).

- In January 2017, at the final approval hearing, the Honorable Kevin H. Sharp of the Middle District of Tennessee commended Robbins Geller attorneys, stating: "It was complicated, it was drawn out, and a lot of work clearly went into this [case] . . . . I think there is some benefit to the shareholders that are above and beyond money, a benefit to the company above and beyond money that changed hands." *In re Community Health Sys., Inc. S'holder Derivative Litig.*, No. 3:11-cv-00489, Transcript at 10 (M.D. Tenn. Jan. 17, 2017).

- In November 2016, at the final approval hearing, the Honorable James G. Carr stated: "I kept throwing the case out, and you kept coming back. . . . And it's both remarkable and noteworthy and a credit to you and your firm that you did so. . . . [Y]ou persuaded the Sixth Circuit. As we know, that's no mean feat at all." Judge Carr further complimented the Firm, noting that it "goes without question or even saying" that Robbins Geller is very well-known nationally and that the settlement is an excellent result for the class. He succinctly concluded that "given the tenacity and the time and the effort that [Robbins Geller] lawyers put into [the case]" makes the class "a lot better off." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, No. 3:05-cv-07393-JGC, Transcript at 4, 10, 14, 17 (N.D. Ohio Nov. 18, 2016).

- In September 2016, in granting final approval of the settlement, Judge Arleo commended the

"vigorous and skilled efforts" of Robbins Geller attorneys for obtaining "an excellent recovery." Judge Arleo added that the settlement was reached after "contentious, hard-fought litigation" that ended with "a very, very good result for the class" in a "risky case." *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Prudential Fin., Inc.*, No. 2:12-cv-05275-MCA-LDW, Transcript of Hearing at 18-20 (D.N.J. Sept. 28, 2016).

- In August 2015, at the final approval hearing for the settlement, the Honorable Karen M. Humphreys praised Robbins Geller's "extraordinary efforts" and "excellent lawyering," noting that the settlement "really does signal that the best is yet to come for your clients and for your prodigious labor as professionals. . . . I wish more citizens in our country could have an appreciation of what this [settlement] truly represents." *Bennett v. Sprint Nextel Corp.*, No. 2:09-cv-02122-EFM-KMH, Transcript at 8, 25 (D. Kan. Aug. 12, 2015).

- In August 2015, the Honorable Judge Max O. Cogburn, Jr. noted that "plaintiffs' attorneys were able [to] achieve the big success early" in the case and obtained an "excellent result." The "extraordinary" settlement was because of "good lawyers . . . doing their good work." *Nieman v. Duke Energy Corp.*, No. 3:12-cv-456, Transcript at 21, 23, 30 (W.D.N.C. Aug. 12, 2015).

- In July 2015, in approving the settlement, the Honorable Douglas L. Rayes of the District of Arizona stated: "Settlement of the case during pendency of appeal for more than an insignificant amount is rare. The settlement here is substantial and provides favorable recovery for the settlement class under these circumstances." He continued, noting, "[a]s against the objective measures of . . . settlements [in] other similar cases, [the recovery] is on the high end." *Teamsters Local 617 Pension & Welfare Funds v. Apollo Grp., Inc.*, No. 2:06-cv-02674-DLR, Transcript at 8, 11 (D. Ariz. July 28, 2015).

- In June 2015, at the conclusion of the hearing for final approval of the settlement, the Honorable Susan Richard Nelson of the District of Minnesota noted that it was "a pleasure to be able to preside over a case like this," praising Robbins Geller in achieving "an outstanding [result] for [its] clients," as she was "very impressed with the work done on th[e] case." *In re St. Jude Med., Inc. Sec. Litig.*, No. 0:10-cv-00851-SRN-TNL, Transcript at 7 (D. Minn. June 12, 2015).

- In May 2015, at the fairness hearing on the settlement, the Honorable William G. Young noted that the case was "very well litigated" by Robbins Geller attorneys, adding that "I don't just say that as a matter of form. . . . I thank you for the vigorous litigation that I've been permitted to be a part of." *Courtney v. Avid Tech., Inc.*, No. 1:13-cv-10686-WGY, Transcript at 8-9 (D. Mass. May 12, 2015).

- In January 2015, the Honorable William J. Haynes, Jr. of the Middle District of Tennessee described the settlement as a "highly favorable result achieved for the Class" through Robbins Geller's "diligent prosecution . . . [and] quality of legal services." The settlement represents the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade. *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.*, No. 3:09-cv-00882, 2015 U.S. Dist. LEXIS 181943, at *6-*7 (M.D. Tenn. Jan. 16, 2015).

- In September 2014, in approving the settlement for shareholders, Vice Chancellor John W. Noble noted "[t]he litigation caused a substantial benefit for the class. It is unusual to see a $29 million recovery." Vice Chancellor Noble characterized the litigation as "novel" and "not easy," but "[t]he lawyers took a case and made something of it." The Court commended Robbins Geller's efforts in obtaining this result: "The standing and ability of counsel cannot be questioned" and "the benefits achieved by plaintiffs' counsel in this case cannot be ignored." *In re Gardner Denver, Inc. S'holder Litig.*, No. 8505-VCN, Transcript at 26-28 (Del. Ch. Sept. 3, 2014).

- In May 2014, at the conclusion of the hearing for final approval of the settlement, the Honorable Elihu M. Berle stated: "I would finally like to congratulate counsel on their efforts to resolve this case, on excellent work – it was the best interest of the class – and to the exhibition of professionalism. So I do thank you for all your efforts." *Liberty Mutual Overtime Cases*, No. JCCP 4234, Transcript at 20:1-5 (Cal. Super. Ct., Los Angeles Cty. May 29, 2014).

- In March 2014, Ninth Circuit Judge J. Clifford Wallace (presiding) expressed the gratitude of the court: "Thank you. I want to especially thank counsel for this argument. This is a very complicated case and I think we were assisted no matter how we come out by competent counsel coming well prepared. . . . It was a model of the type of an exercise that we appreciate. Thank you very much for your work . . . you were of service to the court." *Eclectic Properties East, LLC v. The Marcus & Millichap Co.*, No. 12-16526, Transcript (9th Cir. Mar. 14, 2014).

- In February 2014, in approving a settlement, Judge Edward M. Chen noted the "very substantial risks" in the case and recognized Robbins Geller had performed "extensive work on the case." *In re VeriFone Holdings, Inc. Sec. Litig.*, No. C-07-6140, 2014 U.S. Dist. LEXIS 20044, at *5, *11-*12 (N.D. Cal. Feb. 18, 2014).

- In August 2013, in granting final approval of the settlement, the Honorable Richard J. Sullivan stated: "Lead Counsel is to be commended for this result: it expended considerable effort and resources over the course of the action researching, investigating, and prosecuting the claims, at significant risk to itself, and in a skillful and efficient manner, to achieve an outstanding recovery for class members. Indeed, the result – and the class's embrace of it – is a testament to the experience and tenacity Lead Counsel brought to bear." *City of Livonia Emps. Ret. Sys. v. Wyeth*, No. 07 Civ. 10329, 2013 U.S. Dist. LEXIS 113658, at *13 (S.D.N.Y. Aug. 7, 2013).

- In July 2013, in granting final approval of the settlement, the Honorable William H. Alsup stated that Robbins Geller did "excellent work in this case," and continued, "I look forward to seeing you on the next case." *Fraser v. Asus Comput. Int'l*, No. C 12-0652, Transcript at 12:2-3 (N.D. Cal. July 11, 2013).

- In June 2013, in certifying the class, U.S. District Judge James G. Carr recognized Robbins Geller's steadfast commitment to the class, noting that "plaintiffs, with the help of Robbins Geller, have twice successfully appealed this court's orders granting defendants' motion to dismiss." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, 292 F.R.D. 515, 524 (N.D. Ohio 2013).

- In November 2012, in granting appointment of lead plaintiff, Chief Judge James F. Holderman commended Robbins Geller for its "substantial experience in securities class action litigation" and commented that the Firm "is recognized as 'one of the most successful law firms in securities class actions, if not the preeminent one, in the country.' *In re Enron Corp. Sec.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008) (Harmon, J.)." He continued further that, "'Robbins Geller attorneys are responsible for obtaining the largest securities fraud class action recovery ever [$***7.2*** billion in *Enron*], as well as the largest recoveries in the Fifth, Sixth, Eighth, Tenth and Eleventh Circuits.'" *Bristol Cty. Ret. Sys. v. Allscripts Healthcare Sols., Inc.*, No. 12 C 3297, 2012 U.S. Dist. LEXIS 161441 at *21 (N.D. Ill. Nov. 9, 2012).

- In June 2012, in granting plaintiffs' motion for class certification, the Honorable Inge Prytz Johnson noted that other courts have referred to Robbins Geller as "'one of the most successful law firms in securities class actions . . . in the country.'" *Local 703, I.B. v. Regions Fin. Corp.*, 282 F.R.D. 607, 616 (N.D. Ala. 2012) (quoting *In re Enron Corp. Sec. Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008)), *aff'd in part and vacated in part on other grounds*, 762 F.3d 1248 (11th Cir. 2014).

- In June 2012, in granting final approval of the settlement, the Honorable Barbara S. Jones commented that "class counsel's representation, from the work that I saw, appeared to me to be of the highest quality." *In re CIT Grp. Inc. Sec. Litig.*, No. 08 Civ. 6613, Transcript at 9:16-18 (S.D.N.Y. June 13, 2012).

- In March 2012, in granting certification for the class, Judge Robert W. Sweet referenced the *Enron* case, agreeing that Robbins Geller's "'clearly superlative litigating and negotiating skills'" give the Firm an "'outstanding reputation, experience, and success in securities litigation nationwide,'" thus, "'[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country.'" *Billhofer v. Flamel Techs., S.A.*, 281 F.R.D. 150, 158 (S.D.N.Y. 2012).

- In March 2011, in denying defendants' motion to dismiss, Judge Richard Sullivan commented: "Let me thank you all. . . . [The motion] was well argued . . . and . . . well briefed . . . . I certainly appreciate having good lawyers who put the time in to be prepared . . . ." *Anegada Master Fund Ltd. v. PxRE Grp. Ltd.*, No. 08-cv-10584, Transcript at 83 (S.D.N.Y. Mar. 16, 2011).

- In January 2011, the court praised Robbins Geller attorneys: "They have gotten very good results for stockholders. . . . [Robbins Geller has] such a good track record." *In re Compellent Technologies, Inc. S'holder Litig.*, No. 6084-VCL, Transcript at 20-21 (Del. Ch. Jan. 13, 2011).

- In August 2010, in reviewing the settlement papers submitted by the Firm, Judge Carlos Murguia stated that Robbins Geller performed "a commendable job of addressing the relevant issues with great detail and in a comprehensive manner . . . . The court respects the [Firm's] experience in the field of derivative [litigation]." *Alaska Elec. Pension Fund v. Olofson*, No. 08-cv-02344-CM-JPO (D. Kan.) (Aug. 20, 2010 e-mail from court re: settlement papers).

- In June 2009, Judge Ira Warshawsky praised the Firm's efforts in *In re Aeroflex, Inc. S'holder Litig.*: "There is no doubt that the law firms involved in this matter represented in my opinion the cream of the crop of class action business law and mergers and acquisition litigators, and from a judicial point of view it was a pleasure working with them." *In re Aeroflex, Inc. S'holder Litig.*, No. 003943/07, Transcript at 25:14-18 (N.Y. Sup. Ct., Nassau Cty. June 30, 2009).

- In March 2009, in granting class certification, the Honorable Robert Sweet of the Southern District of New York commented in *In re NYSE Specialists Sec. Litig.*, 260 F.R.D. 55, 74 (S.D.N.Y. 2009): "As to the second prong, the Specialist Firms have not challenged, in this motion, the qualifications, experience, or ability of counsel for Lead Plaintiff, [Robbins Geller], to conduct this litigation. Given [Robbins Geller's] substantial experience in securities class action litigation and the extensive discovery already conducted in this case, this element of adequacy has also been satisfied."

- In June 2008, the court commented, "Plaintiffs' lead counsel in this litigation, [Robbins Geller], has demonstrated its considerable expertise in shareholder litigation, diligently advocating the rights of Home Depot shareholders in this Litigation. [Robbins Geller] has acted with substantial skill and professionalism in representing the plaintiffs and the interests of Home Depot and its shareholders in prosecuting this case." *City of Pontiac General Employees' Ret. Sys. v. Langone*, No. 2006-122302, Findings of Fact in Support of Order and Final Judgment at 2 (Ga. Super. Ct., Fulton Cty. June 10, 2008).

- In a December 2006 hearing on the $50 million consumer privacy class action settlement in *Kehoe v. Fidelity Fed. Bank & Tr.*, No. 03-80593-CIV (S.D. Fla.), United States District Court Judge Daniel

T.K. Hurley said the following:

> First, I thank counsel. As I said repeatedly on both sides, we have been very, very fortunate. We have had fine lawyers on both sides. The issues in the case are significant issues. We are talking about issues dealing with consumer protection and privacy. Something that is increasingly important today in our society. . . . I want you to know I thought long and hard about this. I am absolutely satisfied that the settlement is a fair and reasonable settlement. . . . I thank the lawyers on both sides for the extraordinary effort that has been brought to bear here . . . .

Kehoe v. Fidelity Fed. Bank & Tr., No. 03-80593-CIV, Transcript at 26, 28-29 (S.D. Fla. Dec. 7, 2006).

- In *Stanley v. Safeskin Corp.*, No. 99 CV 454 (S.D. Cal.), where Robbins Geller attorneys obtained $55 million for the class of investors, Judge Moskowitz stated:

> I said this once before, and I'll say it again. I thought the way that your firm handled this case was outstanding. This was not an easy case. It was a complicated case, and every step of the way, I thought they did a very professional job.

Stanley v. Safeskin Corp., No. 99 CV 454, Transcript at 13 (S.D. Cal. May 25, 2004).

ATTORNEY BIOGRAPHIES

Mario Alba Jr. | Partner

Mario Alba is a partner in the Firm's Melville office. He has served as lead counsel in numerous cases and is responsible for initiating, investigating, researching, and filing securities and consumer fraud class actions. He has recovered millions of dollars in numerous actions, including cases against NBTY, Inc. ($16 million), OSI Pharmaceuticals ($9 million recovery) and PXRe Group, Ltd. ($5.9 million). Alba is also a member of the Firm's Institutional Outreach Team, which provides advice to the Firm's institutional clients, including numerous public pension systems and Taft-Hartley funds throughout the United States, and consults with them on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Some of Alba's institutional clients are currently involved in cases involving Microsoft Corp., Endo International PLC, L-3 Communications Holdings, Inc., Iconix Brand Group and BHP Billiton Limited. Alba has lectured at institutional investor conferences throughout the United States on various shareholder issues, including at the Illinois Public Pension Fund Association, the New York State Teamsters Conference, the American Alliance Conference, and the TEXPERS/IPPFA Joint Conference at the New York Stock Exchange, among others.

Education

B.S., St. John's University, 1999; J.D., Hofstra University School of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2012-2013, 2016-2017; B.S., Dean's List, St. John's University, 1999; Selected as participant in Hofstra Moot Court Seminar, Hofstra University School of Law

Susan K. Alexander | Partner

Susan Alexander is a partner in the Firm's San Francisco office. Alexander's practice specializes in federal appeals of securities fraud class actions on behalf of investors. With nearly 30 years of federal appellate experience, she has argued on behalf of defrauded investors in circuit courts throughout the United States. Among her most notable cases are *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery) and the successful appellate ruling in *Alaska Elec. Pension Fund v. Flowserve Corp.* ($55 million recovery). Other representative results include: *W. Va. Pipe Trades Health & Welfare Fund v. Medtronic, Inc.*, 845 F.3d 384 (8th Cir. 2016) (reversing summary judgment of securities fraud action on statute of limitations grounds); *In re Ubiquiti Networks, Inc. Sec. Litig.*, 2016 U.S. App. LEXIS 19141 (9th Cir. 2016) (reversing dismissal of §11 claim); *Carpenters Pension Tr. Fund of St. Louis v. Barclays PLC*, 750 F.3d 227 (2d Cir. 2014) (reversing dismissal of securities fraud complaint, focused on loss causation); *Panther Partners Inc. v. Ikanos Commc'ns, Inc.*, 681 F.3d 114 (2d Cir. 2012) (reversing dismissal of §11 claim); *City of Pontiac Gen. Emps. Ret. Sys. v. MBIA, Inc.*, 637 F.3d 169 (2d Cir. 2011) (reversing dismissal of securities fraud complaint, focused on statute of limitations); *In re Gilead Scis. Sec. Litig.*, 536 F.3d 1049 (9th Cir. 2008) (reversing dismissal of securities fraud complaint, focused on loss causation); and *Barrie v. Intervoice-Brite, Inc.*, 397 F.3d 249 (5th Cir. 2005) (reversing dismissal of securities fraud complaint, focused on scienter). Alexander's prior appellate work was with the California Appellate Project ("CAP"), where she prepared appeals and petitions for writs of *habeas corpus* on behalf of individuals sentenced to death. At CAP, and subsequently in private practice, she litigated and consulted on death penalty direct and collateral appeals for ten years.

Education

B.A., Stanford University, 1983; J.D., University of California, Los Angeles, 1986

Honors / Awards

Super Lawyer, 2015-2018; American Academy of Appellate Lawyers; California Academy of Appellate Lawyers; Ninth Circuit Advisory Rules Committee; Appellate Delegate, Ninth Circuit Judicial Conference; ABA Council of Appellate Lawyers

Jason H. Alperstein | Partner

Jason Alperstein is a partner in the Firm's Boca Raton office. His practices focuses on consumer fraud, securities fraud, mass torts and data breach litigation. Alperstein was an integral member of the *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, & Prods. Liab. Litig.*, No. 15-md-2672 (N.D. Cal.), litigation team, prosecuting claims on behalf of almost 600,000 consumers who were duped into purchasing and leasing Volkswagen, Audi and Porsche vehicles that were marketed as environmentally friendly, yet spewed toxic pollutants up to 40 times the legal limit permitted by the EPA. Working closely with Plaintiffs' Steering Committee ("PSC") member Paul J. Geller, Alperstein was involved in almost all aspects of the litigation. The PSC and government agencies ultimately reached a series of settlements on behalf of purchasers, lessees and dealers that totaled well over $17 billion, the largest consumer automotive settlement in history. Alperstein is actively involved in a number of other class actions and MDLs pending throughout the country, including: *In re Yahoo! Inc. Customer Data Security Breach Litig.*, No. 16-md-02752 (N.D. Cal.), regarding the largest data breach in history; *In re FieldTurf Artificial Turf Mktg. & Sales Practices Litig.*, No. 17-md-02779 (D.N.J.), concerning the sale of defective synthetic turf for use in athletic fields; *In re Chrysler-Dodge-Jeep Ecodiesel Mktg., Sales Practices & Prods. Liab. Litig.*, No. 17-md-02777 (N.D. Cal.), pertaining to Fiat Chrysler's use of defeat devices to hide emission levels on its Jeep and Dodge "EcoDiesel" vehicles; *Benkle v. Ford Motor Co.*, No. 16-cv-01569 (C.D. Cal.), involving defective electronic throttle body units in Ford vehicles; and *Zimmerman v. The 3M Company*, No. 17-cv-01062 (W.D. Mich.), relating to the dumping of toxic waste and polluting of groundwater in Kent County, Michigan.

Prior to joining Robbins Geller, Alperstein served on lead and co-lead litigation teams in nationwide and statewide class action lawsuits against dozens of the largest banking institutions in connection with the unlawful assessment of checking account overdraft fees. His efforts resulted in over $250 million in settlements for his clients and significant changes in the way banks charge overdraft fees to their customers. In addition, he led consumer class actions against product manufacturers for false and deceptive labeling, and some of the world's largest clothing retailers for their use of false and deceptive comparative pricing in their outlet stores.

Education

B.A., Brown University, 2004; M.B.A., University of Miami School of Business, 2008, J.D., University of Miami School of Law, 2008

Honors / Awards

40 & Under Hot List, *Benchmark Litigation*, 2017-2018; Super Lawyer "Rising Star," 2014-2018; Rising Star, Consumer Protection, *Law360*, 2017; J.D., *Cum Laude*, University of Miami School of Law, 2008

Matthew I. Alpert | Partner

Matthew Alpert is a partner in the Firm's San Diego office and focuses on the prosecution of securities fraud litigation. He has helped recover over $800 million for individual and institutional investors financially harmed by corporate fraud. Alpert's current cases include securities fraud cases against Diplomat Pharmacy (E.D. Mich.), Valeant (D.N.J.), Santander Consumer USA (N.D. Tex.) and Banc of California (C.D. Cal.). Alpert is part of the litigation team that successfully obtained class certification in a securities fraud class action against Regions Financial, a class certification decision which was substantively affirmed by the United States Court of Appeals for the Eleventh Circuit in *Local 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.*, 762 F.3d 1248 (11th Cir. 2014). Upon remand, the United States District Court for the Northern District of Alabama granted class certification again, rejecting defendants' post-*Halliburton II* arguments concerning stock price impact.

Education

B.A., University of Wisconsin at Madison, 2001; J.D., Washington University, St. Louis, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2019

Darryl J. Alvarado | Partner

Darryl Alvarado is a partner in the Firm's San Diego office. Alvarado focuses his practice on securities fraud and other complex civil litigation. Alvarado helped secure $388 million for investors in J.P. Morgan RMBS in *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.* That settlement is, on a percentage basis, the largest recovery ever achieved in an RMBS class action. He was also a member of a team of attorneys that secured $95 million for investors in Morgan Stanley-issued RMBS in *In re Morgan Stanley Mortgage Pass-Through Certificates Litig.* In addition, Alvarado was a member of a team of lawyers that obtained landmark settlements, on the eve of trial, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Incorporated* and *King County, Washington v. IKB Deutsche Industriebank AG*. He was integral in obtaining several precedent-setting decisions in those cases, including defeating the rating agencies' historic First Amendment defense and defeating the ratings agencies' motions for summary judgment concerning the actionability of credit ratings.

Education

B.A., University of California, Santa Barbara, 2004; J.D., University of San Diego School of Law, 2007

Honors / Awards

Super Lawyer "Rising Star," 2015-2019; 40 & Under Hot List, *Benchmark Litigation*, 2018; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2011

X. Jay Alvarez | Partner

Jay Alvarez is a partner in the Firm's San Diego office. He focuses his practice on securities fraud litigation and other complex litigation. Alvarez's notable cases include *In re Qwest Commc'ns Int'l, Inc. Sec. Litig.* ($400 million recovery), *In re Coca-Cola Sec. Litig.* ($137.5 million settlement), *In re St. Jude Medical, Inc. Sec. Litig.* ($50 million settlement) and *In re Cooper Cos. Sec. Litig.* ($27 million recovery). Most recently, Alvarez was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members are eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Prior to joining the Firm, Alvarez served as an Assistant United States Attorney for the Southern District of California from 1991-2003. As an Assistant United States Attorney, he obtained extensive trial experience, including the prosecution of bank fraud, money laundering and complex narcotics conspiracy cases. During his tenure as an Assistant United States Attorney, Alvarez also briefed and argued numerous appeals before the Ninth Circuit Court of Appeals.

Education

B.A., University of California, Berkeley, 1984; J.D., University of California, Berkeley, Boalt Hall School of Law, 1987

Stephen R. Astley | Partner

Stephen Astley is a partner in the Firm's Boca Raton office. Astley devotes his practice to representing institutional and individual shareholders in their pursuit to recover investment losses caused by fraud. He has been lead counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for his clients and investors. He was on the trial team that recovered $60 million on behalf of investors in *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Hospira, Inc.* Other notable representations include: *In re Red Hat, Inc. Sec. Litig.* (E.D.N.C.) ($20 million settlement); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps.' Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Prior to joining the Firm, Astley was with the Miami office of Hunton & Williams, where he concentrated his practice on class action defense, including securities class actions and white collar criminal defense. Additionally, he represented numerous corporate clients accused of engaging in unfair and deceptive practices. Astley was also an active duty member of the United States Navy's Judge Advocate General's Corps where he was the Senior Defense Counsel for the Naval Legal Service Office Pearl Harbor Detachment. In that capacity, Astley oversaw trial operations for the Detachment and gained substantial first-chair trial experience as the lead defense counsel in over 75 courts-martial and administrative proceedings. Additionally, from 2002-2003, Astley clerked for the Honorable Peter T. Fay, U.S. Court of Appeals for the Eleventh Circuit.

Education

B.S., Florida State University, 1992; M. Acc., University of Hawaii at Manoa, 2001; J.D., University of Miami School of Law, 1997

Honors / Awards

J.D., *Cum Laude*, University of Miami School of Law, 1997; United States Navy Judge Advocate General's Corps., Lieutenant

A. Rick Atwood, Jr. | Partner

Rick Atwood is a partner in the Firm's San Diego office. As a recipient of the California Lawyer Attorney of the Year ("CLAY") Award for his work on behalf of shareholders, he has successfully represented shareholders in securities class actions, merger-related class actions, and shareholder derivative suits in federal and state courts in more than 30 jurisdictions. Through his litigation efforts at both the trial and appellate levels, Atwood has helped recover billions of dollars for public shareholders, including the largest post-merger common fund recoveries on record.

Most recently, in *In re Dole Food Co., Inc. Stockholder Litig.*, which went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders, Atwood helped obtain $148 million, the largest trial verdict ever in a class action challenging a merger transaction. He was also a key member of the litigation team in *In re Kinder Morgan, Inc. S'holders Litig.*, where he helped obtain an unprecedented $200 million common fund for former Kinder Morgan shareholders, the largest merger & acquisition class action recovery in history.

Atwood also led the litigation team that obtained an $89.4 million recovery for shareholders in *In re Del Monte Foods Co. S'holders Litig.*, after which the Delaware Court of Chancery stated that "it was only through the effective use of discovery that the plaintiffs were able to 'disturb[ ] the patina of normalcy surrounding the transaction.'" The court further commented that "Lead Counsel engaged in hard-nosed discovery to penetrate and expose problems with practices that Wall Street considered 'typical.'" One Wall Street banker even wrote in *The Wall Street Journal* that "'Everybody does it, but Barclays is the one that got caught with their hand in the cookie jar . . . . Now everybody has to rethink how we conduct ourselves in financing situations.'" Atwood's other significant opinions include *Brown v. Brewer* ($45 million recovery) and *In re Prime Hospitality, Inc. S'holders Litig.* ($25 million recovery).

Education

B.A., University of Tennessee, Knoxville, 1987; B.A., Katholieke Universiteit Leuven, Belgium, 1988; J.D., Vanderbilt School of Law, 1991

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2017-2018; M&A Litigation Attorney of the Year in California, *Corporate International*, 2015; Super Lawyer, 2014-2017; Attorney of the Year, *California Lawyer*, 2012; B.A., Great Distinction, Katholieke Universiteit Leuven, Belgium, 1988; B.A., Honors, University of Tennessee, Knoxville, 1987; Authorities Editor, *Vanderbilt Journal of Transnational Law*, 1991

Aelish M. Baig | Partner

Aelish Marie Baig is a partner in the Firm's San Francisco office. She specializes in federal securities and consumer class actions. She focuses primarily on securities fraud litigation on behalf of individual and institutional investors, including state and municipal pension funds, Taft-Hartley funds, and private retirement and investment funds. Baig has litigated a number of cases through jury trial, resulting in multi-million dollar awards and settlements for her clients, and has prosecuted securities fraud, consumer and derivative actions obtaining millions of dollars in recoveries against corporations such as Wells Fargo, Verizon, Celera, Pall and Prudential.

Baig, along with other Robbins Geller attorneys, is currently leading the effort on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*. Additionally, she prosecuted an action against Wells Fargo's directors and officers accusing the giant of engaging in the robosigning of foreclosure papers so as to mass-process home foreclosures, a practice which contributed significantly to the 2008-2009 financial crisis. The resulting settlement was worth more than $67 million in cash, corporate preventative measures and new lending initiatives for residents of cities devastated by Wells Fargo's alleged unlawful foreclosure practices. Baig was part of the litigation and trial team in *White v. Cellco Partnership d/b/a Verizon Wireless*, which resulted in a $25 million settlement and Verizon's agreement to an injunction restricting its ability to impose early termination fees in future subscriber agreements. She was also part of the team that prosecuted dozens of stock option backdating actions, securing tens of millions of dollars in cash recoveries as well as the implementation of comprehensive corporate governance enhancements for numerous companies victimized by their directors' and officers' fraudulent stock option backdating practices. Additionally, Baig prosecuted an action against Prudential Insurance for its alleged failure to pay life insurance benefits to beneficiaries of policyholders it knew or had reason to know had died, resulting in a settlement in excess of $30 million.

Education

B.A., Brown University, 1992; J.D., Washington College of Law at American University, 1998

Honors / Awards

Super Lawyer, 2012-2013; J.D., *Cum Laude*, Washington College of Law at American University, 1998; Senior Editor, *Administrative Law Review*, Washington College of Law at American University

Randall J. Baron | Partner

Randy Baron is a partner in the Firm's San Diego office. He specializes in securities litigation, corporate takeover litigation and breach of fiduciary duty actions. For almost two decades, Baron has headed up a team of lawyers whose accomplishments include obtaining instrumental rulings both at injunction and trial phases, establishing liability of financial advisors and investment banks. With an in-depth understanding of merger and acquisition and breach of fiduciary duty law, an ability to work under extreme time pressures, and the experience and willingness to take a case through trial, he has been responsible for recovering more than a billion dollars for shareholders. Notable achievements over the years include: *In re Kinder Morgan, Inc. S'holders Litig.* (Kan. Dist. Ct., Shawnee Cty.) ($200 million common fund for former Kinder Morgan shareholders, the largest merger & acquisition class action recovery in history); *In re Dole Food Co., Inc. Stockholder Litig.* (Del. Ch.) (obtained $148 million, the largest trial verdict ever in a class action challenging a merger transaction); and *In re Rural/Metro Corp. Stockholders Litig.* (Del. Ch.) (Baron and co-counsel obtained nearly $110 million for shareholders against Royal Bank of Canada Capital Markets LLC). In *In re Del Monte Foods Co. S'holders Litig.* (Del. Ch.), he exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. Baron was one of the lead attorneys representing about 75 public and private institutional investors that filed and settled individual actions in *In re WorldCom Sec. Litig.* (S.D.N.Y.), where more than $657 million was recovered, the largest opt-out (non-class) securities action in history. In *In re Dollar Gen. Corp. S'holder Litig.* (Tenn. Cir. Ct., Davidson Cty.), Baron was lead trial counsel and helped to secure a settlement of up to $57 million in a common fund shortly before trial, and in *Brown v. Brewer* (C.D. Cal.), he secured $45 million for shareholders of Intermix Corporation, relating to News Corp.'s acquisition of that company. Formerly, Baron served as a Deputy District Attorney from 1990-1997 in Los Angeles County.

Education

B.A., University of Colorado at Boulder, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Fellow, Advisory Board, Litigation Counsel of America (LCA); Leading Lawyer in America, *Lawdragon*, 2011, 2017-2019; Litigation Star, *Benchmark Litigation*, 2016-2019; California Star, *Benchmark Litigation*, 2019; National Practice Area Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Best Lawyer in America, *Best Lawyers*®, 2019; Super Lawyer, 2014-2016, 2018-2019; Winning Litigator, *The National Law Journal*, 2018; Leading Lawyer, *Chambers USA*, 2016-2018; Local Litigation Star, *Benchmark Litigation*, 2018; Leading Lawyer, *The Legal 500*, 2014-2018; Recommended Lawyer, *The Legal 500*, 2017; Mergers & Acquisitions Trailblazer, *The National Law Journal*, 2015-2016; Litigator of the Week, *The American Lawyer*, October 16, 2014; Attorney of the Year, *California Lawyer*, 2012; Litigator of the Week, *The American Lawyer*, October 7, 2011; J.D., *Cum Laude*, University of San Diego School of Law, 1990

James E. Barz | Partner

James Barz is a partner at the Firm and manages the Firm's Chicago office. He is a trial lawyer who has tried 18 cases to verdict, a registered CPA, a former federal prosecutor, and has been an adjunct professor at Northwestern University School of Law from 2008 to 2019, teaching courses on trial advocacy and class action litigation. Barz has focused on representing investors in securities fraud class actions that have resulted in recoveries of over $900 million, including: *HCA* ($215 million, M.D. Tenn.); *Motorola* ($200 million, N.D. Ill.); *Sprint* ($131 million, D. Kan.); *Psychiatric Solutions* ($65 million, M.D. Tenn.); *Dana Corp.* ($64 million, N.D. Ohio); and *Hospira*($60 million, N.D. Ill.). He has been lead trial counsel in several of these cases obtaining favorable settlements just days or weeks before trial and after obtaining denials of summary judgment. Barz is currently representing investors in securities fraud litigation against Valeant Pharmaceuticals Inc. (D.N.J.). Barz also handles whistleblower cases, including a successful settlement in *United States v. Signature Healthcare LLC* (M.D. Tenn.) ($30 million), and antitrust cases, including recently being appointed to the Plaintiffs' Steering Committee in *In re Dealer Management Systems Antitrust Litigation* (N.D. Ill.).

Before joining the Firm, Barz was a partner at Mayer Brown LLP from 2006 to 2011 and an associate from 1998 to 2002. At Mayer Brown, Barz handled commercial litigation, internal investigations, and antitrust cases. Barz was also active in their *pro bono* program where, in his first jury trial, he won an acquittal on all charges and, in his first appeal, he obtained the reversal of a conviction based on the trial judge having solicited a bribe from the defendant. From 2002 to 2006 he served as an Assistant United States Attorney in Chicago, trying cases and supervising investigations involving public corruption, financial frauds, tax offenses, money laundering, and drug and firearm offenses. He successfully obtained a conviction against every defendant who went to trial.

Education

B.B.A., Loyola University Chicago, School of Business Administration, 1995; J.D., Northwestern University School of Law, 1998

Honors / Awards

Super Lawyer, 2018-2019; Leading Lawyer, Law Bulletin Media, 2018; B.B.A., *Summa Cum Laude*, Loyola University Chicago, School of Business Administration, 1995; J.D., *Cum Laude*, Northwestern University School of Law, 1998

Nathan W. Bear | Partner

Nate Bear is a partner in the Firm's San Diego office. Bear advises institutional investors on a global basis. His clients include Taft-Hartley funds, public and multi-employer pension funds, fund managers, insurance companies and banks around the world. He counsels clients on securities fraud and corporate governance, and frequently speaks at conferences worldwide. He has recovered over $1 billion for investors, including *In re Cardinal Health, Inc. Sec. Litig.* ($600 million) and *Jones v. Pfizer Inc.* ($400 million). In addition to initiating securities fraud class actions in the United States, he possesses direct experience in potential group actions in the United Kingdom, settlements in the European Union under the Wet Collectieve Afwikkeling Massaschade (WCAM), the Dutch Collective Mass Claims Settlement Act, as well as representative actions in Germany utilizing the Kapitalanlegermusterverfahrensgesetz (KapMuG), the Capital Market Investors' Model Proceeding Act. In *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.*, Bear commenced a lawsuit resulting in the first major ruling upholding fraud allegations against the chief credit rating agencies. That ruling led to the filing of a similar case, *King County, Washington v. IKB Deutsche Industriebank AG*. These cases, arising from the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles, ultimately obtained landmark settlements – on the eve of trial – from the major credit rating agencies and Morgan Stanley. Bear maintained an active role in litigation at the heart of the worldwide financial crisis, and is currently pursuing banks over their manipulation of LIBOR, FOREX and other benchmark rates.

Education

B.A., University of California at Berkeley, 1998; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2011

Alexandra S. Bernay | Partner

Xan Bernay is a partner in the Firm's San Diego office, where she specializes in antitrust and unfair competition class-action litigation. She has also worked on some of the Firm's largest securities fraud class actions, including the *Enron* litigation, which recovered an unprecedented $7.2 billion for investors. Bernay currently serves as co-lead counsel in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig*., in which a settlement of up to $6.26 billion was recently preliminarily approved by the Eastern District of New York. This case was brought on behalf of millions of U.S. merchants against Visa and MasterCard and various card-issuing banks, challenging the way these companies set and collect tens of billions of dollars annually in merchant fees. The settlement is believed to be the largest antitrust class action settlement of all time.

Additionally, Bernay is involved in *In re Remicade Antitrust Litig*. pending in the Eastern District of Pennsylvania – a large case involving anticompetitive conduct in the biosimilars market, where the Firm is sole lead counsel for the end-payor plaintiffs. She is also part of the litigation team in *In re Dealer Mgmt. Sys. Antitrust Litig*. (N.D. Ill.), which involves anticompetitive conduct related to dealer management systems on behalf of auto dealerships across the country. Another representative case is *Persian Gulf Inc. v. BP West Coast Prods. LLC* (S.D. Cal.), a massive case against the largest gas refiners in the world brought by gasoline station owners who allege they were overcharged for gasoline in California as a result of anticompetitive conduct. Bernay has also had experience in large consumer class actions, including *In re Checking Account Overdraft Litig*., which case was brought on behalf of bank customers who were overcharged for debit card transactions and resulted in more than $500 million in settlements with major banks that manipulated customers' debit transactions to maximize overdraft fees. She also helped try to verdict a case against one of the world's largest companies who was sued on behalf of consumers.

Education

B.A., Humboldt State University, 1997; J.D., University of San Diego School of Law, 2000

Honors / Awards

Litigator of the Week, *Global Competition Review*, October 1, 2014

Erin W. Boardman | Partner

Erin Boardman is a partner in the Firm's Melville office, where her practice focuses on representing individual and institutional investors in class actions brought pursuant to the federal securities laws. She has been involved in the prosecution of numerous securities class actions that have resulted in millions of dollars in recoveries for defrauded investors, including: *Medoff v. CVS Caremark Corp*. (D.R.I.) ($48 million recovery); *Construction Laborers Pension Trust of Greater St. Louis v. Autoliv Inc*. (S.D.N.Y.) ($22.5 million recovery); *In re Gildan Activewear Inc. Sec. Litig*. (S.D.N.Y.) (resolved as part of a $22.5 million global settlement); *In re L.G. Phillips LCD Co., Ltd., Sec. Litig*. (S.D.N.Y.) ($18 million recovery); *In re Giant Interactive Grp., Inc. Sec. Litig*. (S.D.N.Y.) ($13 million recovery); *In re Coventry HealthCare, Inc. Sec. Litig*. (D. Md.) ($10 million recovery); *Lenartz v. American Superconductor Corp*. (D. Mass.) ($10 million recovery); *Dudley v. Haub* (D.N.J.) ($9 million recovery); *Hildenbrand v. W Holding Co*. (D.P.R.) ($8.75 million recovery); *In re Doral Financial Corp. Sec. Litig*. (D.P.R.) ($7 million recovery); and *Van Dongen v. CNinsure Inc*. (S.D.N.Y.) ($6.625 million recovery). During law school, Boardman served as Associate Managing Editor of *the Journal of Corporate, Financial and Commercial Law* interned in the chambers of the Honorable Kiyo A. Matsumoto in the United States District Court for the Eastern District of New York, and represented individuals on a *pro bono* basis through the Workers' Rights Clinic.

Education

B.A., State University of New York at Binghamton, 2003; J.D., Brooklyn Law School, 2007

Honors / Awards

Super Lawyer "Rising Star," 2015-2018; B.A., *Magna Cum Laude*, State University of New York at Binghamton, 2003

Douglas R. Britton | Partner

Doug Britton is a partner in the Firm's San Diego office. His practice focuses on securities fraud and corporate governance. Britton has been involved in settlements exceeding $1 billion and has secured significant corporate governance enhancements to improve corporate functioning. Notable achievements include *In re WorldCom, Inc. Sec. & "ERISA" Litig.*, where he was one of the lead partners that represented a number of opt-out institutional investors and secured an unprecedented recovery of $651 million; *In re SureBeam Corp. Sec. Litig.*, where he was the lead trial counsel and secured an impressive recovery of $32.75 million; and *In re Amazon.com, Inc. Sec. Litig.*, where he was one of the lead attorneys securing a $27.5 million recovery for investors.

Education

B.B.A., Washburn University, 1991; J.D., Pepperdine University School of Law, 1996

Honors / Awards

J.D., *Cum Laude*, Pepperdine University School of Law, 1996

Luke O. Brooks | Partner

Luke Brooks is a partner in the Firm's securities litigation practice group in the San Diego office. He focuses primarily on securities fraud litigation on behalf of individual and institutional investors, including state and municipal pension funds, Taft-Hartley funds, and private retirement and investment funds. Brooks was on the trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases recently prosecuted by Brooks include *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.*, in which plaintiffs recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities, and a pair of cases – *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.* ("Cheyne") and *King County, Washington, et al. v. IKB Deutsche Industriebank AG* ("Rhinebridge") – in which plaintiffs obtained a settlement, on the eve of trial in Cheyne, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles.

Education

B.A., University of Massachusetts at Amherst, 1997; J.D., University of San Francisco, 2000

Honors / Awards

California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Local Litigation Star, *Benchmark Litigation*, 2017-2018; Recommended Lawyer, *The Legal 500*, 2017-2018; Member, *University of San Francisco Law Review*, University of San Francisco

Spencer A. Burkholz | Partner

Spence Burkholz is a partner in the Firm's San Diego office and a member of the Firm's Executive and Management Committees. He has 21 years of experience in prosecuting securities class actions and private actions on behalf of large institutional investors. Burkholz was one of the lead trial attorneys in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Burkholz has also recovered billions of dollars for injured shareholders in cases such as *Enron* ($7.2 billion), *WorldCom* ($657 million), *Countrywide* ($500 million) and *Qwest* ($445 million). He is currently representing large institutional investors in actions involving the credit crisis.

Education

B.A., Clark University, 1985; J.D., University of Virginia School of Law, 1989

Honors / Awards

Leading Lawyer in America, *Lawdragon*, 2018-2019; Top 100 Trial Lawyer, *Benchmark Litigation*, 2018-2019; Top 20 Trial Lawyer in California, *Benchmark Litigation*, 2019; California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Super Lawyer, 2015-2016, 2019; Best Lawyer in America, *Best Lawyers®*, 2018-2019; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Plaintiff Attorney of the Year, *Benchmark Litigation*, 2018; Local Litigation Star, *Benchmark Litigation*, 2015-2018; Recommended Lawyer, *The Legal 500*, 2017-2018; B.A., *Cum Laude*, Clark University, 1985; *Phi Beta Kappa*, Clark University, 1985

Michael G. Capeci | Partner

Michael Capeci is a partner in Robbins Geller Rudman & Dowd LLP's Melville office. His practice focuses on prosecuting complex securities and breach of fiduciary duty class actions, as well as shareholder derivative lawsuits.

Throughout his tenure with the Firm, Capeci has played an integral role in cases such as: *Carpenters Pension Trust Fund of St. Louis v. Barclays PLC*; *City of Pontiac General Employees' Retirement System v. Lockheed Martin Corporation*; *Plumbers and Pipefitters Local Union No. 630 Pension-Annuity Trust Fund v. Arbitron Inc.*; *Billhofer v. Flamel Technologies, S.A.*; *In re Virgin Media Inc. Shareholders Litigation*; and *Allen v. El Paso Pipeline GP Company, L.L.C.*

Education

B.S., Villanova University, 2007; J.D., Hofstra University School of Law, 2010

Honors / Awards

Super Lawyer "Rising Star," 2014-2018; J.D., *Cum Laude,* Hofstra University School of Law, 2010

Brian E. Cochran | Partner

Brian Cochran is a partner in the Firm's San Diego and Chicago offices. He focuses his practice on complex securities and shareholder derivative litigation. In particular, Cochran specializes in case investigation and initiation, and lead plaintiff issues arising under the Private Securities Litigation Reform Act of 1995. He was a member of the litigation team that obtained a $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade.

Most recently, Cochran was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members are eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis. In addition, Cochran developed a groundbreaking securities fraud lawsuit against Fifth Street Finance and its external asset manager, which led to over $14 million in settlements, significant corporate reforms and a follow-on SEC investigation. Cochran has also helped secure class certification and/or successfully opposed a motion to dismiss in class action litigation against several prominent corporate defendants, including Goldman Sachs, Big Lots and Scotts Miracle-Gro.

Education

A.B., Princeton University, 2006; J.D., University of California at Berkeley School of Law, Boalt Hall, 2012

Honors / Awards

A.B., With Honors, Princeton University, 2006; J.D., Order of the Coif, University of California at Berkeley School of Law, Boalt Hall, 2012

Susannah R. Conn | Partner

Susannah Conn is a partner in the Firm's San Diego office, where her practice focuses on complex securities litigation. Since joining the Firm, Conn has participated in the prosecution of several cases that have resulted in substantial recoveries for investors, including *Alaska Elec. Pension Fund v. Pharmacia Corp.*, *City of Livonia Emps.' Ret. Sys. v. Wyeth* and *In re Sanofi-Aventis Sec. Litig.* Most recently, she was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, No. SACV15-0865 (C.D. Cal.), a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Education

B.A., University of Wyoming, 1995; J.D., California Western School of Law, 1999

Honors / Awards

J.D., *Magna Cum Laude*, California Western School of Law, 1999; Executive Lead Articles Editor, *California Western Law Review*, California Western School of Law; B.A., *Cum Laude*, University of Wyoming, 1995; Outstanding Graduate Award, University of Wyoming

Joseph D. Daley | Partner

Joseph Daley is a partner in the Firm's San Diego office, serves on the Firm's Securities Hiring Committee, and is a member of the Firm's Appellate Practice Group. Precedents include: *City of Providence v. Bats Glob. Mkts., Inc.*, 878 F.3d 36 (2d Cir. 2017); *DeJulius v. New Eng. Health Care Emps. Pension Fund*, 429 F.3d 935 (10th Cir. 2005); *Frank v. Dana Corp.* ("*Dana I*"), 547 F.3d 564 (6th Cir. 2008); *Frank v. Dana Corp.* ("*Dana II*"), 646 F.3d 954 (6th Cir. 2011); *Freidus v. Barclays Bank Plc*, 734 F.3d 132 (2d Cir. 2013); *In re HealthSouth Corp. Sec. Litig.*, 334 F. App'x 248 (11th Cir. 2009); *In re Merck & Co. Sec., Derivative & ERISA Litig.*, 493 F.3d 393 (3d Cir. 2007); *In re Quality Sys., Inc. Sec. Litig.*, 865 F.3d 1130 (9th Cir. 2017); *In re Qwest Commc'ns Int'l*, 450 F.3d 1179 (10th Cir. 2006); *Luther v. Countrywide Home Loans Servicing LP*, 533 F.3d 1031 (9th Cir. 2008); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, 693 F.3d 145 (2d Cir. 2012); *Rosenbloom v. Pyott* ("*Allergan*"), 765 F.3d 1137 (9th Cir. 2014); *Silverman v. Motorola Solutions, Inc.*, 739 F.3d 956 (7th Cir. 2013); *Siracusano v. Matrixx Initiatives, Inc.*, 585 F.3d 1167 (9th Cir. 2009), *aff'd*, 563 U.S. 27 (2011); and *Southland Sec. Corp. v. INSpire Ins. Solutions Inc.*, 365 F.3d 353 (5th Cir. 2004). Daley is admitted to practice before the U.S. Supreme Court, as well as before 12 U.S. Courts of Appeals around the nation.

Education

B.S., Jacksonville University, 1981; J.D., University of San Diego School of Law, 1996

Honors / Awards

Super Lawyer, 2011-2012, 2014-2018; Appellate Moot Court Board, Order of the Barristers, University of San Diego School of Law; Best Advocate Award (Traynore Constitutional Law Moot Court Competition), First Place and Best Briefs (Alumni Torts Moot Court Competition and USD Jessup International Law Moot Court Competition)

Patrick W. Daniels | Partner

Patrick Daniels is a founding and managing partner in the Firm's San Diego office. He is widely recognized as a leading corporate governance and investor advocate. The *Daily Journal*, the leading legal publisher in California, named him one of the 20 most influential lawyers in California under 40 years of age. Additionally, the Yale School of Management's Millstein Center for Corporate Governance and Performance awarded Daniels its "Rising Star of Corporate Governance" honor for his outstanding leadership in shareholder advocacy and activism. Daniels counsels private and state government pension funds, central banks and fund managers in the United States, Australia, United Arab Emirates, United Kingdom, the Netherlands, and other countries within the European Union on issues related to corporate fraud in the United States securities markets and on "best practices" in the corporate governance of publicly traded companies. Daniels has represented dozens of institutional investors in some of the largest and most significant shareholder actions, including *Enron*, *WorldCom*, *AOL Time Warner*, *BP*, *Pfizer*, *Countrywide*, *Petrobras* and *Volkswagen*, to name just a few. In the wake of the financial crisis, he represented dozens of investors in structured investment products in ground-breaking actions against the ratings agencies and Wall Street banks that packaged and sold supposedly highly rated shoddy securities to institutional investors all around the world.

Education

B.A., University of California, Berkeley, 1993; J.D., University of San Diego School of Law, 1997

Honors / Awards

One of the Most 20 Most Influential Lawyers in the State of California Under 40 Years of Age, *Daily Journal*; Rising Star of Corporate Governance, Yale School of Management's Milstein Center for Corporate Governance & Performance; B.A., *Cum Laude*, University of California, Berkeley, 1993

Stuart A. Davidson | Partner

Stuart Davidson is a partner in the Firm's Boca Raton office. His practice focuses on complex consumer class actions, including cases involving deceptive and unfair trade practices, privacy and data breach issues, and antitrust violations. Davidson served as class counsel in one of the earliest privacy cases, *Kehoe v. Fidelity Federal Bank & Trust*, where he represented half-a-million Florida drivers against a national bank for purchasing their private information from the state department of motor vehicles for marketing purposes, in violation of the Driver's Privacy Protection Act. His efforts resulted in a seminal privacy decision on damages by the Eleventh Circuit, 421 F.3d 1209 (11th Cir. 2005), *cert. denied*, 547 U.S. 1051 (2006), and after years of hard-fought litigation, including an appeal to the United States Supreme Court, he was able to obtain a $50 million recovery for the class. He was also integral in obtaining a settlement valued at $15 million in *In re Sony Gaming Networks & Customer Data Security Breach Litigation*, concerning claims related to the massive data breach of Sony's PlayStation Network, and currently serves as a member of the Plaintiffs' Executive Committee in *In re Yahoo! Inc. Customer Data Security Breach Litigation* in the Northern District of California regarding the largest data breach in history. Davidson is actively involved in *In re Facebook Biometric Information Privacy Litigation*, concerning Facebook's alleged privacy violations through its collection of user's biometric identifiers without informed consent, both cutting-edge nationwide privacy consumer class actions in California.

Most recently, Davidson was appointed to the Plaintiffs' Steering Committee in *In re Intel Corp. CPU Marketing, Sales Practices and Products Liability Litigation*, which concerns serious security vulnerabilities – known as "Spectre" and "Meltdown" – that infect nearly all of Intel's x86 processors manufactured and sold since 1995, the patching of which results in processing speed degradation of the impacted computer, server or mobile device. Davidson also currently serves as co-lead counsel for hundreds of retired NHL players in *In re NHL Players' Concussion Injury Litigation* in the District of Minnesota, and is spearheading several aspects of *In re EpiPen (Epinephrine Injection, USP) Marketing, Sales Practices and Antitrust Litigation* in the District of Kansas, a case involving the illegal monopolization of the epinephrine auto-injector market, which allowed the prices of the life-saving EpiPen to rise over 600% in 9 years, and where Robbins Geller named partner Paul J. Geller was appointed co-lead counsel.

Davidson is a former lead assistant public defender in the Felony Division of the Broward County, Florida Public Defender's Office. During his tenure at the Public Defender's Office, he tried over 30 jury trials, conducted hundreds of depositions, handled numerous evidentiary hearings, engaged in extensive motion practice, and defended individuals charged with major crimes ranging from third-degree felonies to life and capital felonies.

Education

B.A., State University of New York at Geneseo, 1993; J.D., Nova Southeastern University Shepard Broad College of Law, 1996

Honors / Awards

J.D., *Summa Cum Laude*, Nova Southeastern University Shepard Broad College of Law, 1996; Associate Editor, *Nova Law Review*, Book Awards in Trial Advocacy, Criminal Pretrial Practice and International Law

Jason C. Davis | Partner

Jason Davis is a partner in the Firm's San Francisco office where he practices securities class actions and complex litigation involving equities, fixed-income, synthetic and structured securities issued in public and private transactions. Davis was on the trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Most recently, he was part of the litigation team in *Luna v. Marvell Tech. Grp., Ltd.*, resulting in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors.

Prior to joining the Firm, Davis focused on cross-border transactions, mergers and acquisitions at Cravath, Swaine and Moore LLP in New York.

Education

B.A., Syracuse University, 1998; J.D., University of California at Berkeley, Boalt Hall School of Law, 2002

Honors / Awards

B.A., *Summa Cum Laude*, Syracuse University, 1998; International Relations Scholar of the year, Syracuse University; Teaching fellow, examination awards, Moot court award, University of California at Berkeley, Boalt Hall School of Law

Mark J. Dearman | Partner

Mark Dearman is a partner in the Firm's Boca Raton office, where his practice focuses on consumer fraud, securities fraud, mass torts, antitrust, whistleblower and corporate takeover litigation. Dearman, along with other Robbins Geller attorneys, is currently leading the effort on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*. He was also recently appointed as the Chair of the Plaintiffs' Executive Committee in *In re Apple Inc. Device Performance Litigation* and was appointed to the Plaintiffs' Executive Committee in *In re FieldTurf Artificial Turf Mktg. Practices Litig.*, which alleges that FieldTurf USA Inc. and its related companies sold defective synthetic turf for use in athletic fields. His other recent representative cases include: *In re NHL Players' Concussion Injury Litig.*, 2015 U.S. Dist. LEXIS 38755 (D. Minn. 2015); *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, 903 F. Supp. 2d 942 (S.D. Cal. 2012); *In re Volkswagen "Clean Diesel" Mktg. Sales Practice, & Prods. Liab. Litig.*, 2016 U.S. Dist. LEXIS 1357 (N.D. Cal. 2016); *In re Ford Fusion & C-Max Fuel Econ. Litig.*, 2015 U.S. Dist. LEXIS 155383 (S.D.N.Y. 2015); *Looper v. FCA US LLC*, No. 5:14-cv-00700 (C.D. Cal.); *In re Aluminum Warehousing Antitrust Litig.*, 95 F. Supp. 3d 419 (S.D.N.Y. 2015), *aff'd*, 833 F.3d 151 (2d Cir. 2016); *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J.); *In re Winn-Dixie Stores, Inc. S'holder Litig.*, No. 16-2011-CA-010616 (Fla. 4th Jud. Cir. Ct., Duval Cty.); *Gemelas v. Dannon Co. Inc.*, No. 1:08-cv-00236 (N.D. Ohio); and *In re AuthenTec, Inc. S'holder Litig.*, No. 05-2012-CA-57589 (Fla. 18th Jud. Cir. Ct., Brevard Cty.). Prior to joining the Firm, he founded Dearman & Gerson, where he defended Fortune 500 companies, with an emphasis on complex commercial litigation, consumer claims, and mass torts (products liability and personal injury), and has obtained extensive jury trial experience throughout the United States. Having represented defendants for so many years before joining the Firm, Dearman has a unique perspective that enables him to represent clients effectively.

Education

B.A., University of Florida, 1990; J.D., Nova Southeastern University, 1993

Honors / Awards

AV rated by Martindale-Hubbell; Super Lawyer, 2014-2018; In top 1.5% of Florida Civil Trial Lawyers in *Florida Trend*'s Florida Legal Elite, 2006, 2004

Kathleen B. Douglas | Partner

Kathleen Douglas is a partner in Robbins Geller Rudman & Dowd LLP's Boca Raton office. She focuses her practice on securities fraud class actions and consumer fraud.

Douglas was a member of the litigation team in *In re UnitedHealth Grp. Inc. PSLRA Litig.*, achieving a substantial $925 million settlement. In addition to the monetary recovery, UnitedHealth also made critical changes to a number of its corporate governance policies, including electing a shareholder-nominated member to the company's Board of Directors. Douglas also worked on *Nieman v. Duke Energy Corp*. ($146.25 million recovery), which is the largest recovery in North Carolina for a case involving securities fraud, and one of the five largest recoveries in the Fourth Circuit. She also worked on the *R.H. Donnelley* case, obtaining a $25 million settlement, and the *21st Century* case, resulting in a $2.2 million recovery.

Douglas has served as class counsel in several class actions brought on behalf of Florida emergency room physicians. These cases were against some of the nation's largest Health Maintenance Organizations and settled for substantial increases in reimbursement rates and millions of dollars in past damages for the class.

Education

B.S., Georgetown University, 2004; J.D., University of Miami School of Law, 2007

Honors / Awards

Super Lawyer "Rising Star" in the field of Class Actions, 2012-2017; B.S., *Cum Laude*, Georgetown University, 2004

Travis E. Downs III | Partner

Travis Downs is a partner in the Firm's San Diego office. His areas of expertise include prosecution of shareholder and securities litigation, including complex shareholder derivative actions. Downs led a team of lawyers who successfully prosecuted over 65 stock option backdating derivative actions in federal and state courts across the country, resulting in hundreds of millions in financial givebacks for the plaintiffs and extensive corporate governance enhancements, including annual directors elections, majority voting for directors and shareholder nomination of directors. Notable cases include: *In re Community Health Sys., Inc. S'holder Derivative Litig.* ($60 million in financial relief and unprecedented corporate governance reforms); *In re Marvell Tech. Grp. Ltd. Derivative Litig.* ($54 million in financial relief and extensive corporate governance enhancements); *In re McAfee, Inc. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Affiliated Computer Servs. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re KB Home S'holder Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Juniper Networks Derivative Litig.* ($22.7 million in financial relief and extensive corporate governance enhancements); *In re Nvidia Corp. Derivative Litig.* ($15 million in financial relief and extensive corporate governance enhancements); and *City of Pontiac Gen. Emps.' Ret. Sys. v. Langone* (achieving landmark corporate governance reforms for investors).

He was also part of the litigation team that obtained a $67 million settlement in *City of Westland Police & Fire Ret. Sys. v. Stumpf*, a shareholder derivative action alleging that Wells Fargo participated in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, and a $250 million settlement in *In re Google, Inc. Derivative Litig.*, an action alleging that Google facilitated in the improper advertising of prescription drugs. Downs is a frequent speaker at conferences and seminars and has lectured on a variety of topics related to shareholder derivative and class action litigation.

Education

B.A., Whitworth University, 1985; J.D., University of Washington School of Law, 1990

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2018-2019; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Board of Trustees, Whitworth University; Super Lawyer, 2008; B.A., Honors, Whitworth University, 1985

Daniel S. Drosman | Partner

Dan Drosman is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He focuses his practice on securities fraud and other complex civil litigation and has obtained significant recoveries for investors in cases such as *Morgan Stanley*, *Cisco Systems*, *Coca-Cola*, *Petco*, *PMI* and *America West*. Drosman served as one of the lead trial attorneys in *Jaffe v. Household Int'l, Inc.* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Drosman also led a group of attorneys prosecuting fraud claims against the credit rating agencies, where he was distinguished as one of the few plaintiffs' counsel to overcome the credit rating agencies' motions to dismiss.

Prior to joining the Firm, Drosman served as an Assistant District Attorney for the Manhattan District Attorney's Office, and an Assistant United States Attorney in the Southern District of California, where he investigated and prosecuted violations of the federal narcotics, immigration, and official corruption law.

Education

B.A., Reed College, 1990; J.D., Harvard Law School, 1993

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2019; Leading Lawyer in America, *Lawdragon*, 2018-2019; Super Lawyer, 2017-2019; Recommended Lawyer, *The Legal 500*, 2017-2018; Top 100 Lawyer, *Daily Journal*, 2017; Department of Justice Special Achievement Award, Sustained Superior Performance of Duty; B.A., Honors, Reed College, 1990; *Phi Beta Kappa*, Reed College, 1990

Thomas E. Egler | Partner

Tom Egler is a partner in the Firm's San Diego office and focuses his practice on representing clients in major complex, multidistrict litigations, such as *Lehman Brothers*, *Countrywide Mortgage Backed Securities*, *WorldCom*, *AOL Time Warner* and *Qwest*. He has represented institutional investors both as plaintiffs in individual actions and as lead plaintiffs in class actions. Prior to joining the Firm, Egler was a law clerk to the Honorable Donald E. Ziegler, Chief Judge, United States District Court, Western District of Pennsylvania.

Education

B.A., Northwestern University, 1989; J.D., The Catholic University of America, Columbus School of Law, 1995

Honors / Awards

Super Lawyer, 2017-2018; Associate Editor, the *Catholic University Law Review*

Alan I. Ellman | Partner

Alan Ellman is a partner in the Firm's Melville office, where he concentrates his practice on prosecuting complex securities fraud cases on behalf of institutional investors. Most recently, Ellman was on the team of Robbins Geller attorneys who obtained a $34.5 million recovery in *Patel v. L-3 Communications Holdings, Inc.*, which represents a high percentage of damages that plaintiffs could reasonably expect to be recovered at trial and is more than eight times higher than the average settlement of cases with comparable investor losses. He was also on the team of attorneys who recovered in excess of $34 million for investors in *In re OSG Sec. Litig.*, which represented an outsized recovery of 93% of bond purchasers' damages and 28% of stock purchasers' damages. The creatively structured settlement included more than $15 million paid by a bankrupt entity. In 2006, Ellman received a Volunteer and Leadership Award from Housing Conservation Coordinators (HCC) for his *pro bono* service defending a client in Housing Court against a non-payment action, arguing an appeal before the Appellate Term, and staffing HCC's legal clinic. He also successfully appealed a *pro bono* client's criminal sentence before the Appellate Division.

Education

B.S., B.A., State University of New York at Binghamton, 1999; J.D., Georgetown University Law Center, 2003

Honors / Awards

Super Lawyer, 2017-2018; Super Lawyer "Rising Star," 2014-2015; B.S., B.A., *Cum Laude*, State University of New York at Binghamton, 1999

Jason A. Forge | Partner

Jason Forge is a partner in the Firm's San Diego office. He specializes in complex investigations, litigation and trials. As a federal prosecutor and private practitioner, Forge has conducted and supervised scores of jury and bench trials in federal and state courts, including the month-long trial of a defense contractor who conspired with Congressman Randy "Duke" Cunningham in the largest bribery scheme in congressional history. He recently obtained preliminary approval of a $160 million recovery in the first securities fraud case against Wal-Mart Stores, Inc. in *City of Pontiac General Employees' Retirement System v. Wal-Mart Stores, Inc.* Most recently, Forge was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Forge was a key member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement refunds over 90% of the money thousands of students paid to "enroll" in Trump University. He represented the class on a *pro bono* basis. Forge has also successfully defeated motions to dismiss and obtained class certification against several prominent defendants, including the first federal RICO case againstScotts Miracle-Gro. He was a member of the litigation team that obtained a $125 million settlement in *In re LendingClub Securities Litigation*, a settlement that ranks among the top ten largest securities recoveries ever in the Northern District of California.

In a case against another prominent defendant, Pfizer Inc., Forge led an investigation that uncovered key documents that Pfizer had not produced in discovery. Although fact discovery in the case had already closed, the district judge ruled that the documents had been improperly withheld and ordered that discovery be reopened, including reopening the depositions of Pfizer's former CEO, CFO and General Counsel. Less than six months after completing these depositions, Pfizer settled the case for $400 million. Forge has also taught trial practice techniques on local and national levels, and has written and argued many state and federal appeals, including an *en banc* argument in the Ninth Circuit. He also teaches White Collar Crime at the University of San Diego School of Law.

Education

B.B.A., The University of Michigan Ross School of Business, 1990; J.D., The University of Michigan Law School, 1993

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2019; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2018; Top 100 Lawyer, *Daily Journal*, 2017; Litigator of the Year, *Our City San Diego,* 2017; Two-time recipient of one of Department of Justice's highest awards: Director's Award for Superior Performance by Litigation Team; numerous commendations from Federal Bureau of Investigation (including commendation from FBI Director Robert Mueller III), Internal Revenue Service, and Defense Criminal Investigative Service; J.D., *Magna Cum Laude*, Order of the Coif, The University of Michigan Law School, 1993; B.B.A., High Distinction, The University of Michigan Ross School of Business, 1990

Paul J. Geller | Partner

Paul Geller, managing partner of Robbins Geller Rudman & Dowd LLP's Boca Raton, Florida office, is a founding partner of the Firm, a member of its Executive and Management Committees and head of the Firm's Consumer Practice Group. Geller's 25 years of litigation experience is broad, and he has handled cases in each of the Firm's practice areas. Notably, before devoting his practice to the representation of consumers and investors, he defended companies in high-stakes class action litigation, providing him an invaluable perspective. Geller has tried bench and jury trials on both the plaintiffs' and defendants' sides, and has argued before numerous state, federal and appellate courts throughout the country.

Geller was recently selected to serve in a leadership position on behalf of governmental entities and other plaintiffs in the sprawling litigation concerning the nationwide prescription opioid epidemic. In reporting on the selection of the lawyers to lead the case, *The National Law Journal* reported that Geller and "[t]he team reads like a 'Who's Who' in mass torts." Geller was also part of the leadership team representing consumers in the massive *Volkswagen "Clean Diesel" Emissions* case. The San Francisco legal newspaper *The Recorder* labeled Geller and the group that was appointed in that case, which settled for more than $17 billion, a "class action dream team."

Geller is also currently serving as Co-Lead Counsel in *In re EpiPen (Epinephrine Injection, USP) Mktg., Sales Practices & Antitrust Litig.*, a nationwide class action that alleges that pharmaceutical company Mylan N.V. and others engaged in anticompetitive and unfair business conduct in its sale and marketing of the EpiPen Auto-Injector device.

Some of Geller's other recent noteworthy successes include a $265 million recovery against Massey Energy in *In re Massey Energy Co. Sec. Litig.*, in which Massey was found accountable for a tragic explosion at the Upper Big Branch mine in Raleigh County, West Virginia. Geller also secured a $146.25 million recovery against Duke Energy in *Nieman v. Duke Energy Corp.*, the largest recovery in North Carolina for a case involving securities fraud, and one of the five largest recoveries in the Fourth Circuit.

Education

B.S., University of Florida, 1990; J.D., Emory University School of Law, 1993

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2017-2019; Rated AV by Martindale-Hubbell; Fellow, Litigation Counsel of America (LCA) Proven Trial Lawyers; Leading Lawyer in America, *Lawdragon*, 2006-2007, 2009-2019; Super Lawyer, 2007-2018; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2018; Lawyer of the Year, *Best Lawyers*®, 2018; Attorney of the Month, *Attorney At Law*, 2017; Featured in "Lawyer Limelight" series, *Lawdragon*, 2017; Recommended Lawyer, *The Legal 500*, 2016; Top Rated Lawyer, South Florida's Legal Leaders, *Miami Herald*, 2015; Litigation Star, *Benchmark Litigation*, 2013; "Legal Elite," *Florida Trend Magazine*; One of "Florida's Most Effective Lawyers," *American Law Media*, One of Florida's top lawyers in *South Florida Business* Journal, One of the Nation's Top "40 Under 40," *The National Law Journal*; One of Florida's Top Lawyers, *Law & Politics*; Editor, *Emory Law Journal*; Order of the Coif, Emory University School of Law

Christopher C. Gold | Partner

Christopher Gold is a partner in the Firm's Boca Raton office. His practice focuses on merger and acquisition, securities fraud, and consumer fraud litigation.

Gold is licensed to practice in Florida at both the state and the federal level and has worked on a number of notable cases, including: *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.* (S.D. Cal.), involving the massive data breach of Sony's PlayStation Network in 2011, which settled for benefits valued at $15 million; *In re Winn-Dixie Stores, Inc. S'holder Litig.* (Fla. 4th Cir. Ct.), which recovered $9 million for former Winn-Dixie shareholders following the corporate buyout by BI-LO, the then-largest merger and acquisition recovery in Florida history; *In re AuthenTec, Inc. S'holder Litig.* (Fla. 18th Cir. Ct.), which settled for $10 million (a new Florida record) on behalf of the former shareholders of AuthenTec following a buyout by Apple, which incorporated AuthenTec's fingerprint technology into the Apple iPhone; and *Boland v. Gerdau S.A., et al.* (S.D.N.Y.), which settled for $15 million.

Education

B.S., Lynn University, 2006; J.D., DePaul University College of Law, 2010

Jonah H. Goldstein | Partner

Jonah Goldstein is a partner in the Firm's San Diego office and is responsible for prosecuting complex securities cases and obtaining recoveries for investors. He also represents corporate whistleblowers who report violations of the securities laws. Goldstein has achieved significant settlements on behalf of investors including in *In re HealthSouth Sec. Litig.* (over $670 million recovered against HealthSouth, UBS and Ernst & Young), *In re Cisco Sec. Litig.* (approximately $100 million), and *Marcus v. J.C. Penney Company, Inc.* ($97.5 million recovery). Goldstein also served on the Firm's trial team in *In re AT&T Corp. Sec. Litig.*, MDL No. 1399 (D.N.J.), which settled after two weeks of trial for $100 million, and aided in the $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade. Most recently, he was part of the litigation team in *Luna v. Marvell Tech. Grp., Ltd.*, resulting in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors. Prior to joining the Firm, Goldstein served as a law clerk for the Honorable William H. Erickson on the Colorado Supreme Court and as an Assistant United States Attorney for the Southern District of California, where he tried numerous cases and briefed and argued appeals before the Ninth Circuit Court of Appeals.

Education

B.A., Duke University, 1991; J.D., University of Denver College of Law, 1995

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2018; Comments Editor, *University of Denver Law Review*, University of Denver College of Law

Benny C. Goodman III | Partner

Benny Goodman is a partner in the Firm's San Diego office. He primarily represents plaintiffs in shareholder actions on behalf of aggrieved corporations. Goodman has recovered hundreds of millions of dollars in shareholder derivative actions pending in state and federal courts across the nation. Most recently, he led a team of lawyers in litigation brought on behalf of Community Health Systems, Inc., resulting in a $60 million payment to the company, the largest recovery in a shareholder derivative action in Tennessee and the Sixth Circuit, as well as best in class value enhancing corporate governance reforms that included two shareholder nominated directors to the Community Health Board of Directors.

Similarly, Goodman recovered a $25 million payment to Lumber Liquidators and numerous corporate governance reforms, including a shareholder nominated director, in *In re Lumber Liquidators Holdings, Inc. S'holder Derivative Litig.* In *In re Google Inc. S'holder Derivative Litig.*, Goodman achieved groundbreaking corporate governance reforms designed to mitigate regulatory and legal compliance risk associated with online pharmaceutical advertising, including among other things, the creation of a $250 million fund to help combat rogue pharmacies from improperly selling drugs online.

Education

B.S., Arizona State University, 1994; J.D., University of San Diego School of Law, 2000

Honors / Awards

Super Lawyer, 2018-2019; Recommended Lawyer, *The Legal 500*, 2017

Elise J. Grace | Partner

Elise Grace is a partner in the San Diego office and counsels the Firm's institutional clients on options to secure premium recoveries in securities litigation both within the United States and internationally. Grace is a frequent lecturer and author on securities and accounting fraud, and develops annual MCLE and CPE accredited educational programs designed to train public fund representatives on practices to protect and maximize portfolio assets, create long-term portfolio value and best fulfill fiduciary duties. Grace has routinely been named a Recommended Lawyer by *The Legal 500*. Grace has prosecuted various significant securities fraud class actions, as well as the AOL Time Warner state and federal securities opt-out litigations, which resulted in a combined settlement of over $629 million for defrauded investors. Prior to joining the Firm, Grace practiced at Clifford Chance, where she defended numerous Fortune 500 companies in securities class actions and complex business litigation.

Education

B.A., University of California, Los Angeles, 1993; J.D., Pepperdine School of Law, 1999

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2016-2017; J.D., *Magna Cum Laude*, Pepperdine School of Law, 1999; American Jurisprudence Bancroft-Whitney Award – Civil Procedure, Evidence, and Dalsimer Moot Court Oral Argument; Dean's Academic Scholarship Recipient, Pepperdine School of Law; B.A., *Summa Cum Laude*, University of California, Los Angeles, 1993; B.A., *Phi Beta Kappa*, University of California, Los Angeles, 1993

Tor Gronborg | Partner

Tor Gronborg is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He often lectures on topics such as the Federal Rules of Civil Procedure and electronic discovery. Gronborg has served as lead or co-lead counsel in numerous securities fraud cases that have collectively recovered nearly $2 billion for investors. Most recently, he was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, No. SACV15-0865 (C.D. Cal.), a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Gronborg's work has included significant recoveries against corporations such as Cardinal Health ($600 million), Motorola ($200 million), Duke Energy ($146.25 million), Sprint Nextel Corp. ($131 million), Prison Realty ($104 million), CIT Group ($75 million), Wyeth ($67.5 million) and Intercept Pharmaceuticals ($55 million). On three separate occasions, Gronborg's pleadings have been upheld by the federal Courts of Appeals (*Broudo v. Dura Pharm., Inc.*, 339 F.3d 933 (9th Cir. 2003), *rev'd on other grounds*, 544 U.S. 336 (2005); *In re Daou Sys.*, 411 F.3d 1006 (9th Cir. 2005); *Staehr v. Hartford Fin. Servs. Grp.*, 547 F.3d 406 (2d Cir. 2008)). He has also been responsible for a number of significant rulings, including *In re Sanofi-Aventis Sec. Litig.*, 293 F.R.D. 449 (S.D.N.Y. 2013); *Silverman v. Motorola, Inc.*, 798 F. Supp. 2d 954 (N.D. Ill. 2011); *Roth v. Aon Corp.*, No. 04-C-6835, 2008 U.S. Dist. LEXIS 18471 (N.D. Ill. Mar. 7, 2008); *In re Cardinal Health, Inc. Sec. Litigs.*, 426 F. Supp. 2d 688 (S.D. Ohio 2006); and *In re Dura Pharm., Inc. Sec. Litig.*, 452 F. Supp. 2d 1005 (S.D. Cal. 2006).

Education

B.A., University of California, Santa Barbara, 1991; Rotary International Scholar, University of Lancaster, U.K., 1992; J.D., University of California, Berkeley, 1995

Honors / Awards

Super Lawyer, 2013-2019; Moot Court Board Member, University of California, Berkeley; AFL-CIO history scholarship, University of California, Santa Barbara

Ellen Gusikoff Stewart | Partner

Ellen Stewart is a partner in the Firm's San Diego office, and is a member of the Firm's Summer Associate Hiring Committee. She currently practices in the Firm's settlement department, negotiating and documenting complex securities, merger, ERISA and derivative action settlements. Notable settlements include: *KBC Asset Management v. 3D Systems Corp*. (D.S.C. 2018) ($50 million); *Luna v. Marvell Tech. Grp*. (N.D. Cal. 2018) ($72.5 million); *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc*. (M.D. Tenn. 2015) ($65 million); and *City of Sterling Heights Gen. Emps.' Ret. Sys v. Hospira, Inc*. (N.D. Ill. 2014) ($60 million).

Stewart has served on the Federal Bar Association Ad Hoc Committee for the revisions to the Settlement Guidelines for the Northern District of California and was a contributor to the Guidelines and Best Practices – Implementing 2018 Amendments to Rule 23 Class Action Settlement Provisions manual of the Bolch Judicial Institute at the Duke University School of Law.

Education

B.A., Muhlenberg College, 1986; J.D., Case Western Reserve University, 1989

Honors / Awards

Peer-Rated by Martindale-Hubbell

Robert Henssler | Partner

Bobby Henssler is a partner in the Firm's San Diego office, where he focuses his practice on securities fraud and other complex civil litigation. He has obtained significant recoveries for investors in cases such as *Enron*, *Blackstone* and *CIT Group*. Henssler is currently a key member of the team of attorneys prosecuting fraud claims against Goldman Sachs stemming from Goldman's conduct in subprime mortgage transactions (including "Abacus").

Most recently, Henssler served on the litigation team for *Schuh v. HCA Holdings, Inc*., which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved approximately 70% of classwide damages, which as a percentage of damages significantly exceeds the median class action recovery of 2%-3% of damages. Henssler was also part of the litigation teams for *Marcus v. J.C. Penney Company, Inc*. ($97.5 million recovery); *Landmen Partners Inc. v. The Blackstone Group L.P*. ($85 million recovery); *In re Novatel Wireless Sec. Litig*. ($16 million recovery); *Carpenters Pension Trust Fund of St. Louis v. Barclays PLC* ($14 million settlement); and *Kmiec v. Powerwave Technologies, Inc*. ($8.2 million settlement).

Education

B.A., University of New Hampshire, 1997; J.D., University of San Diego School of Law, 2001

Honors / Awards

Recommended Lawyer, *The Legal 500*, 2018

Dennis J. Herman | Partner

Dennis Herman is a partner in the Firm's San Francisco office where he focuses his practice on securities class actions. He has led or been significantly involved in the prosecution of numerous securities fraud claims that have resulted in substantial recoveries for investors, including settled actions against Massey Energy ($265 million), Coca-Cola ($137 million), VeriSign ($78 million), Psychiatric Solutions, Inc. ($65 million), St. Jude Medical, Inc. ($50 million), NorthWestern ($40 million), BancorpSouth ($29.5 million), America Service Group ($15 million), Specialty Laboratories ($12 million), Stellent ($12 million) and Threshold Pharmaceuticals ($10 million).

Education

B.S., Syracuse University, 1982; J.D., Stanford Law School, 1992

Honors / Awards

Best Lawyer in America, *Best Lawyers*®, 2018-2019; Super Lawyer, 2017-2018; Order of the Coif, Stanford Law School; Urban A. Sontheimer Award (graduating second in his class), Stanford Law School; Award-winning Investigative Newspaper Reporter and Editor in California and Connecticut

John Herman | Partner

John Herman is a partner at the Firm, the Chair of the Firm's Intellectual Property and Technology Practice and manages the Firm's Atlanta office. His practice focuses on complex civil litigation, with a particular emphasis on high technology matters. His experience includes securities, patent, antitrust, data breach, whistleblower and class action litigation. Herman also has significant first chair trial experience, handling numerous cases through verdict in both federal and state courts. Herman has worked on many noteworthy cases and successfully achieved favorable results for his clients. His notable cases include a recent derivative settlement of $60 million on behalf of Community Health Systems, as well as leading a team of attorneys enforcing the 3Com Ethernet patents, winning two jury trial victories in federal court. Herman also represented renowned inventor Ed Phillips in the landmark case *of Phillips v. AWH Corp*. He has represented the pioneers of mesh technology – David Petite, Edwin Brownrigg and SIPCO – in connection with their mesh technology portfolio. Herman has also worked on numerous class action cases, including acting as lead plaintiffs' counsel in the Home Depot shareholder derivative action, which achieved landmark corporate governance reforms for investors.

Education

B.S., Marquette University, 1988; J.D., Vanderbilt University Law School, 1992

Honors / Awards

Fellow, Litigation Counsel of America (LCA) Proven Trial Lawyers; Super Lawyer, 2005-2010, 2017-2019; Top Lawyers, *Atlanta Magazine*, 2017; Top 100 Georgia Super Lawyers list, 2007; One of "Georgia's Most Effective Lawyers," *Legal Trend*; John Wade Scholar, Vanderbilt University Law School; Editor-in-Chief, *Vanderbilt Journal*, Vanderbilt University Law School; B.S., *Summa Cum Laude*, Marquette University, 1988

Steven F. Hubachek | Partner

Steve Hubachek is a partner in the Firm's San Diego office. He is a member of the Firm's appellate group, where his practice concentrates on federal appeals. He has more than 25 years of appellate experience, has argued over 100 federal appeals, including 3 cases before the United States Supreme Court and 7 cases before en banc panels of the Ninth Circuit Court of Appeals. Prior to his work with the Firm, Hubachek joined Perkins Coie in Seattle, Washington, as an associate. He was admitted to the Washington State Bar in 1987 and was admitted to the California State Bar in 1990, practicing for many years with Federal Defenders of San Diego, Inc. He also had an active trial practice, including over 30 jury trials, and was Chief Appellate Attorney for Federal Defenders.

Education

B.A., University of California, Berkeley, 1983; J.D., Hastings College of the Law, 1987

Honors / Awards

AV rated by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2014-2019; Super Lawyer, 2007-2009, 2019; Assistant Federal Public Defender of the Year, National Federal Public Defenders Association, 2011; Appellate Attorney of the Year, San Diego Criminal Defense Bar Association, 2011 (co-recipient); President's Award for Outstanding Volunteer Service, Mid City Little League, San Diego, 2011; E. Stanley Conant Award for exceptional and unselfish devotion to protecting the rights of the indigent accused, 2009 (joint recipient); *The Daily Transcript* Top Attorneys, 2007; J.D., *Cum Laude*, Order of the Coif, Thurston Honor Society, Hastings College of Law, 1987

Maxwell R. Huffman | Partner

Maxwell Huffman is a partner in the Firm's San Diego office. He focuses his practice on representing both institutional and individual shareholders in securities class action litigation in the context of mergers and acquisitions. Huffman was part of the litigation team for *In re Dole Food Co., Inc. Stockholder Litig.*, where he went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders and obtained $148 million, the largest trial verdict ever in a class action challenging a merger transaction.

Education

B.A., California State University, Sacramento, 2005; J.D., Gonzaga University School of Law, 2009

Honors / Awards

Winning Litigator, *The National Law Journal*, 2018

James I. Jaconette | Partner

James Jaconette is one of the founding partners of the Firm and is located in its San Diego office. He manages cases in the Firm's securities class action and shareholder derivative litigation practices. He has served as one of the lead counsel in securities cases with recoveries to individual and institutional investors totaling over $8 billion. He also advises institutional investors, including hedge funds, pension funds and financial institutions. Landmark securities actions in which he contributed in a primary litigating role include *In re Informix Corp. Sec. Litig.*, and *In re Dynegy Inc. Sec. Litig.* and *In re Enron Corp. Sec. Litig.*, where he represented lead plaintiff The Regents of the University of California. Most recently, Jaconette was part of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved approximately 70% of classwide damages, which as a percentage of damages significantly exceeds the median class action recovery of 2%-3% of damages.

Education

B.A., San Diego State University, 1989; M.B.A., San Diego State University, 1992; J.D., University of California Hastings College of the Law, 1995

Honors / Awards

J.D., *Cum Laude*, University of California Hastings College of the Law, 1995; Associate Articles Editor, *Hastings Law Journal*, University of California Hastings College of the Law; B.A., with Honors and Distinction, San Diego State University, 1989

Rachel L. Jensen | Partner

Rachel Jensen is a partner in the Firm's San Diego office. For 16 years, Jensen has developed a track record of success in helping to craft impactful business reforms and recover billions on behalf of individuals, businesses, and government entities injured by unlawful business practices, fraudulent schemes, and hazardous products.

Jensen was one of the lead attorneys who secured a historic recovery on behalf of Trump University students nationwide in two class actions against President Donald J. Trump. The settlement provided $25 million and provided nearly 100% refunds to 7,000 class members. Jensen represented the class on a *pro bono* basis. She was appointed by Judge Chen to serve on the Plaintiffs' Steering Committee in multidistrict litigation ("MDL") against Fiat Chrysler and Bosch for installing and concealing defeat devices in "EcoDiesel" SUVs and trucks; a global $840 million settlement is pending approval. Jensen also serves as one of class counsel in a RICO class action against Scotts Miracle-Gro for selling wild bird food treated with pesticides that are hazardous to birds; a class action settlement of up to $85 million is pending approval. Additionally, Jensen represents drivers against Volkswagen in one of the most brazen corporate frauds in recent history and helped recover $17 billion; represents California passengers in a consumer and civil rights case against Greyhound for voluntarily subjecting its paying customers to discriminatory immigration raids; and serves as one of the lead counsel for policyholders against certain Lloyd's Syndicates for collusive practices in the Lloyd's market.

Among other recoveries, Jensen has played significant roles in *In re LendingClub Sec. Litig.*, No. 3:16-cv-02627-WHA (N.D. Cal.) ($125 million settlement that ranks among the top ten largest securities recoveries ever in the Northern District of California); *Negrete v. Allianz Life Ins. Co. of N. Am.*, No. CV056838CAS(MANx) (C.D. Cal.) ($250 million to senior citizens targeted for exorbitant deferred annuities that would not mature in their lifetimes); *In re Ins. Brokerage Antitrust Litig.*, No. 04-5184(CCC) (D.N.J.) ($200 million recovered for policyholders who paid inflated premiums due to kickback scheme among major insurers and brokers); *City of Westland Police & Fire Ret. Sys. v. Stumpf*, No. 3:11-cv-02369-SI (N.D. Cal.) ($67 million in homeowner down-payment assistance and credit counseling for cities hardest hit by the foreclosure crisis and computer integration for mortgage servicing segments in derivative settlement with Wells Fargo for "robo-signing" of foreclosure affidavits); *In re Mattel, Inc., Toy Lead Paint Prods. Liab. Litig.*, No. 2:07-ml-01897-DSF-AJW (C.D. Cal.) ($50 million in refunds and quality assurance business reforms for toys made in China with lead and magnets); *In re Checking Account Overdraft Litig.*, No. 1:09-md-2036-JLK (S.D. Fla.) ($500 million in settlements with major banks for manipulating debit transactions to maximize overdraft fees).

Education

B.A., Florida State University, 1997; University of Oxford, International Human Rights Law Program at New College, Summer 1998; J.D., Georgetown University Law School, 2000

Honors / Awards

Leading Lawyer in America, *Lawdragon*, 2017-2019; Super Lawyer, 2016-2019; Plaintiffs' Lawyer Trailblazer, *The National Law Journal*, 2018; Top Woman Lawyer, *Daily Journal*, 2017; Super Lawyer "Rising Star," 2015; Nominated for 2011 Woman of the Year, *San Diego Magazine*; Editor-in-Chief, *First Annual Review of Gender and Sexuality Law*, Georgetown University Law School; Dean's List 1998-1999; B.A., *Cum Laude*, Florida State University's Honors Program, 1997; *Phi Beta Kappa*

Steven M. Jodlowski | Partner

Steven Jodlowski is a partner in the Firm's San Diego office. His practice focuses on high-stakes complex litigation, often involving antitrust, securities and consumer claims. In recent years, he has specialized in representing investors in a series of antitrust actions involving the manipulation of benchmark rates, including the ISDAfix Benchmark litigation, which to date has resulted in the recovery of $504.5 million on behalf of investors, *In re Treasuries Sec. Auction Antitrust Litig.*, and *In re SSA Bonds Antitrust Litig*. Jodlowski was also part of the trial team in an antitrust monopolization case against a multinational computer and software company.

Jodlowski has successfully prosecuted numerous antitrust and RICO cases. These cases resulted in the recovery of more than $1 billion for investors and policyholders. Jodlowski has also represented institutional and individual shareholders in corporate takeover actions in state and federal court. He has handled pre- and post-merger litigation stemming from the acquisition of publicly listed companies in the biotechnology, oil and gas, information technology, specialty retail, electrical, banking, finance and real estate industries, among others.

Education

B.B.A., University of Central Oklahoma, 2002; J.D., California Western School of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2019; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2018; CAOC Consumer Attorney of the Year Award Finalist, 2015; J.D., *Cum Laude*, California Western School of Law, 2005

Peter M. Jones | Partner

Peter Jones is a partner in the Firm's Atlanta office. He has experience handling a wide range of complex civil litigation matters, including securities, intellectual property, whistleblower, product liability, premises liability, class action and commercial disputes. Jones has significant trial experience in both federal and state courts. Before joining the Firm, Jones practiced at King & Spalding LLP and clerked for the Honorable J.L. Edmondson, then Chief Judge of the United States Court of Appeals for the Eleventh Circuit.

Education

B.A., University of the South, 1999; J.D., University of Georgia School of Law, 2003

Honors / Awards

Super Lawyer "Rising Star," 2012-2013; Member, *Georgia Law Review*, Order of the Barristers, University of Georgia School of Law

Evan J. Kaufman | Partner

Evan Kaufman is a partner in the Firm's Melville office. He focuses his practice in the area of complex litigation, including securities, ERISA, corporate fiduciary duty, derivative, and consumer fraud class actions. Kaufman has served as lead counsel or played a significant role in numerous actions, including *In re TD Banknorth S'holders Litig.* ($50 million recovery); *In re Gen. Elec. Co. ERISA Litig.* ($40 million cost to GE, including significant improvements to GE's employee retirement plan, and benefits to GE plan participants valued in excess of $100 million); Energy*Solutions*, Inc. Sec. Litig. ($26 million recovery); Lockheed Martin Corp. Sec. Litig. ($19.5 million recovery); *In re Warner Chilcott Ltd. Sec. Litig.* ($16.5 million recovery); *In re Third Avenue Mgmt. Sec. Litig.* ($14.25 million recovery); *In re Giant Interactive Grp., Inc. Sec. Litig.* ($13 million recovery); *In re Royal Grp. Tech. Sec. Litig.* ($9 million recovery); Fidelity Ultra Short Bond Fund Litig. ($7.5 million recovery); *In re Audiovox Derivative Litig.* ($6.75 million recovery and corporate governance reforms); State Street Yield Plus Fund Litig. ($6.25 million recovery); *In re Merrill Lynch & Co., Inc., Internet Strategies Sec. Litig.* (resolved as part of a $39 million global settlement); and *In re MONY Grp., Inc. S'holder Litig.* (obtained preliminary injunction requiring disclosures in proxy statement).

Education

B.A., University of Michigan, 1992; J.D., Fordham University School of Law, 1995

Honors / Awards

Super Lawyer, 2013-2015, 2017-2018; Member, *Fordham International Law Journal*, Fordham University School of Law

David A. Knotts | Partner

David Knotts is a partner in the Firm's San Diego office and, in addition to ongoing litigation work, teaches a full-semester course on M&A litigation at the University of California Berkeley School of Law. He focuses his practice on securities class action litigation in the context of mergers and acquisitions, representing both individual shareholders and institutional investors. Knotts has been counsel of record for shareholders on a number of significant recoveries in courts and throughout the country, including *In re Rural/Metro Corp. Stockholders Litig.* (nearly $110 million total recovery, affirmed by the Delaware Supreme Court in *RBC v. Jervis*), *In re Del Monte Foods Co. S'holders Litig.* ($89.4 million), *Websense* ($40 million), *In re Onyx S'holders Litig.* ($30 million), and *Joy Global* ($20 million). *Websense* and *Onyx* are both believed to be the largest post-merger class settlements in California state court history. When Knotts recently presented the settlement as lead counsel for the stockholders in *Joy Global*, the United States District Court for the Eastern District of Wisconsin noted that "this is a pretty extraordinary settlement, recovery on behalf of the members of the class. . . . [I]t's always a pleasure to work with people who are experienced and who know what they are doing."

Before joining Robbins Geller, Knotts was an associate at one of the largest law firms in the world and represented corporate clients in various aspects of state and federal litigation, including major antitrust matters, trade secret disputes and unfair competition claims.

Education

B.S., University of Pittsburgh, 2001; J.D., Cornell Law School, 2004

Honors / Awards

40 & Under Hot List, *Benchmark Litigation*, 2018; Recommended Lawyer, *The Legal 500*, 2017-2018; Wiley W. Manuel Award for Pro Bono Legal Services, State Bar of California; Casa Cornelia Inns of Court; J.D., *Cum Laude*, Cornell Law School, 2004

Laurie L. Largent | Partner

Laurie Largent is a partner in the Firm's San Diego, California office. Her practice focuses on securities class action and shareholder derivative litigation and she has helped recover millions of dollars for injured shareholders. Largent was part of the litigation team that obtained a $265 million recovery in *In re Massey Energy Co. Sec. Litig.*, in which Massey was found accountable for a tragic explosion at the Upper Big Branch mine in Raleigh County, West Virginia. She also helped obtain $67.5 million for Wyeth shareholders in *City of Livonia Employees' Retirement System v. Wyeth, et al.*, settling claims that the defendants misled investors about the safety and commercial viability of one of the company's leading drug candidates. Most recently, Largent was on the team that secured a $64 million recovery for Dana Corp. shareholders in *Plumbers & Pipefitters National Pension Fund v. Burns*, in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action. She has been a board member on the San Diego County Bar Foundation and the San Diego Volunteer Lawyer Program since 2014. Largent has also served as an Adjunct Business Law Professor at Southwestern College in Chula Vista, California.

Education

B.B.A., University of Oklahoma, 1985; J.D., University of Tulsa, 1988

Honors / Awards

Board Member, San Diego County Bar Foundation, 2014-present; Board Member, San Diego Volunteer Lawyer Program, 2014-present

Angel P. Lau | Partner

Angel Lau is a partner in Robbins Geller Rudman & Dowd LLP's San Diego office, where her practice focuses on complex securities litigation. She is a member of the litigation team prosecuting actions against investment banks and the leading national credit rating agencies for their role in structuring and rating structured investment vehicles. These cases are among the first to successfully allege fraud against the rating agencies, whose ratings have historically been protected by the First Amendment.

As part of the Firm's litigation team, Lau helped secure a $388 million recovery for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.* The resulting settlement is, on a percentage basis, the largest recovery ever achieved in a class action brought on behalf of purchasers of RMBS. She was part of the litigation team that obtained a landmark $272 million recovery from the Second Circuit Court of Appeals in its precedent-setting *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* decision, which dramatically expanded the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of mortgage-backed securities investors. Additionally, Lau also helped to obtain a landmark settlement, on the eve of trial, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the structured investment vehicles in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.* Prior to joining the Firm, Lau worked at an investment bank in New York, with experience in arbitrage trading and securitized products.

Education

B.A., Stanford University, 1994; J.D., University of San Diego School of Law, 2012

Arthur C. Leahy | Partner

Art Leahy is a founding partner in the Firm's San Diego office and a member of the Firm's Executive and Management Committees. He has over 20 years of experience successfully litigating securities actions and derivative cases. Leahy has recovered well over two billion dollars for the Firm's clients and has negotiated comprehensive pro-investor corporate governance reforms at several large public companies. Most recently, Leahy helped secure a $272 million recovery on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* In the *Goldman* Sachs case, he helped achieve favorable decisions in the Second Circuit Court of Appeals on behalf of investors of Goldman Sachs mortgage-backed securities and again in the Supreme Court, which denied Goldman Sachs' petition for certiorari, or review, of the Second Circuit's reinstatement of the plaintiff's case. He was also part of the Firm's trial team in the AT&T securities litigation, which AT&T and its former officers paid $100 million to settle after two weeks of trial. Prior to joining the Firm, he served as a judicial extern for the Honorable J. Clifford Wallace of the United States Court of Appeals for the Ninth Circuit, and served as a judicial law clerk for the Honorable Alan C. Kay of the United States District Court for the District of Hawaii.

Education

B.A., Point Loma Nazarene University, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Super Lawyer, 2016-2017; J.D., *Cum Laude*, University of San Diego School of Law, 1990; Managing Editor, *San Diego Law Review*, University of San Diego School of Law

Nathan R. Lindell | Partner

Nate Lindell is a partner in the Firm's San Diego office, where his practice focuses on representing aggrieved investors in complex civil litigation. He has helped achieve numerous significant recoveries for investors, including: *In re Enron Corp. Sec. Litig.* ($***7.2*** billion recovery); *In re HealthSouth Corp. Sec. Litig.* ($671 million recovery); *Luther v. Countrywide Fin. Corp.* ($500 million recovery); *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.* ($388 million recovery); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* ($272 million recovery); *In re Morgan Stanley Mortgage Pass-Through Certificates Litig.* ($95 million recovery); *Massachusetts Bricklayers and Masons Trust Funds v. Deutsche Alt-A Securities, Inc.* ($32.5 million recovery); *City of Ann Arbor Employees' Ret. Sys. v. Citigroup Mortgage Loan Trust Inc.* ($24.9 million recovery); and *Plumbers' Union Local No. 12 Pension Fund v. Nomura Asset Acceptance Corp.* ($21.2 million recovery). In October 2016, Lindell successfully argued in front of the New York Supreme Court, Appellate Division, First Judicial Department, for the reversal of an earlier order granting defendants' motion to dismiss in *Phoenix Light SF Limited, et al. v. Morgan Stanley, et al.*

Lindell was also a member of the litigation team responsible for securing a landmark victory from the Second Circuit Court of Appeals in its precedent-setting *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* decision, which dramatically expanded the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of mortgage-backed securities investors, and ultimately resulted in a $272 million recovery for investors.

Education

B.S., Princeton University, 2003; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; Charles W. Caldwell Alumni Scholarship, University of San Diego School of Law; CALI/AmJur Award in Sports and the Law

Ryan Llorens | Partner

Ryan Llorens is a partner in the Firm's San Diego office. Llorens' practice focuses on litigating complex securities fraud cases. He has worked on a number of securities cases that have resulted in significant recoveries for investors, including *In re HealthSouth Corp. Sec. Litig.* ($670 million); *AOL Time Warner* ($629 million); *In re AT&T Corp. Sec. Litig.* ($100 million); *In re Fleming Cos. Sec. Litig.* ($95 million); and *In re Cooper Cos., Inc. Sec Litig.* ($27 million).

Education

B.A., Pitzer College, 1997; J.D., University of San Diego School of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2015

Andrew S. Love | Partner

Andrew Love is a partner in the Firm's San Francisco office. His practice focuses primarily on appeals of securities fraud class action cases. Love has briefed and argued cases on behalf of defrauded investors and consumers in several U.S. Courts of Appeal, as well as in the California appellate courts. Prior to joining the Firm, Love represented inmates on California's death row in appellate and habeas corpus proceedings, successfully arguing capital cases in both the California Supreme Court and the Ninth Circuit. During his many years as a death penalty lawyer, he co-chaired the Capital Case Defense Seminar (2004-2013), recognized as the largest conference for death penalty practitioners in the country. He regularly presented at the seminar and at other conferences on a wide variety of topics geared towards effective appellate practice. Additionally, he was on the faculty of the National Institute for Trial Advocacy's Post-Conviction Skills Seminar. Love has also written several articles on appellate advocacy and capital punishment that have appeared in *The Daily Journal*, *CACJ Forum*, *American Constitution Society*, and other publications.

Education

University of Vermont, 1981; J.D., University of San Francisco School of Law, 1985

Honors / Awards

J.D., *Cum Laude*, University of San Francisco School of Law, 1985; McAuliffe Honor Society, University of San Francisco School of Law, 1982-1985

Erik W. Luedeke | Partner

Erik Luedeke is a partner in the Firm's San Diego office, where his practice focuses on the prosecution of complex securities and shareholder derivative litigation. Luedeke was a member of the trial team in *Jaffe v. Household Int'l, Inc.*, No. 02-C-5893 (N.D. Ill.), a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. He was also part of the litigation teams in *In re UnitedHealth Grp. Inc. PSLRA Litig.*, No. 06-CV-1691 (D. Minn.) ($925 million recovery), and *In re Questcor Pharm., Inc. Sec. Litig.*, No. 8:12-cv-01623 (C.D. Cal.) ($38 million recovery).

Currently, Luedeke is involved in prosecuting a variety of shareholder derivative actions on behalf of corporations and shareholders injured by wayward corporate fiduciaries. Notable shareholder derivative actions in which he participated and the recoveries he helped to achieve include *In re Community Health Sys., Inc. S'holder Derivative Litig.* ($60 million in financial relief and unprecedented corporate governance reforms), *In re Lumber Liquidators Holdings, Inc. S'holder Derivative Litig.* ($26 million in financial relief plus substantial governance) and *In re Google Inc. S'holder Derivative Litig.* ($250 million in financial relief to fund substantial governance).

Education

B.S./B.A., University of California Santa Barbara, 2001; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; Student Comment Editor, *San Diego International Law Journal*, University of San Diego School of Law

Carmen A. Medici | Partner

Carmen Medici is a partner in the Firm's San Diego office and focuses on complex antitrust class action litigation and unfair competition law. He represents businesses and consumers who are the victims of price-fixing, monopolization, collusion, and other anticompetitive and unfair business practices. Medici specializes in litigation against giants in the financial, pharmaceutical and commodities industries.

A veteran of litigation in the credit card industry, Medici is currently representing merchants in *In re Payment Card Interchange Fee and Merchant Discount Litig.*, in which a settlement of up to $6.26 billion was recently preliminarily approved by the Eastern District of New York. Thought to be the largest antitrust class action case in history, the case charges Visa, MasterCard and the country's major banks with violating federal law in the allegedly collusive manner in which rules are set in the industry, including rules requiring payment of ever-increasing interchange fees by merchants. He is also a part of the co-lead counsel team in *In re SSA Bonds Antitrust Litig.*, pending in the Southern District of New York, representing bond purchasers who were defrauded by a brazen price-fixing scheme perpetrated by traders at some of the nation's largest banks. Medici is also a member of the litigation team in *In re Dealer Management Systems Antitrust Litig.*, a lawsuit brought on behalf of car dealerships pending in federal court in Chicago, where one defendant has settled for nearly $30 million.

Education

B.S., Arizona State University, 2003; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2019

Matthew S. Melamed | Partner

Matt Melamed is a partner in the Firm's San Francisco office, where he focuses on complex securities litigation and whistleblower representation. Since joining the Firm, he has been a member of litigation teams responsible for substantial investor recoveries, including *Jones v. Pfizer* (S.D.N.Y.), *In re St. Jude Medical, Inc. Securities Litigation* (D. Minn.), *Oklahoma Police Pension & Retirement System v. Sientra, Inc.* (Cal. Super. Ct., San Mateo Cty.) and *In re Willbros Group, Inc. Securities Litigation* (S.D. Tex.). He has also contributed to the Firm's appellate work, including in *Mineworkers' Pension Scheme, British Coal Staff Superannuation v. First Solar, Inc.* (9th Cir.) and *China Development Industrial Bank v. Morgan Stanley & Co. Incorporated* (N.Y. App. Div.). Melamed, along with other Robbins Geller attorneys, is currently leading the effort on behalf of cities and counties around the country in *In re National Prescription Opiate Litigation*.

Education

B.A., Wesleyan University, 1996; J.D., University of California, Hastings College of the Law, 2008

Honors / Awards

Super Lawyer "Rising Star," 2015-2018; J.D., *Magna Cum Laude*, University of California, Hastings College of the Law, 2008; Tony Patino Fellow, University of California, Hastings College of the Law; Order of the Coif, University of California, Hastings College of the Law; Senior Articles Editor, *Hastings Law Journal*, University of California, Hastings College of the Law; Student Director, General Assistance Advocacy Project, University of California, Hastings College of the Law

Mark T. Millkey | Partner

Mark Millkey is a partner in the Firm's Melville office. He has significant experience in the areas of securities and consumer litigation, as well as in federal and state court appeals.

During his career, Millkey has worked on a major consumer litigation against MetLife that resulted in a benefit to the class of approximately $1.7 billion, as well as a securities class action against Royal Dutch/Shell that settled for a minimum cash benefit to the class of $130 million and a contingent value of more than $180 million. Since joining Robbins Geller, he has worked on securities class actions that have resulted in approximately $300 million in settlements.

Education

B.A., Yale University, 1981; M.A., University of Virginia, 1983; J.D., University of Virginia, 1987

Honors / Awards

Super Lawyer, 2013-2018

David W. Mitchell | Partner

David Mitchell is a partner in the Firm's San Diego office and focuses his practice on antitrust and securities fraud litigation. As head of the Firm's Antitrust and Competition Law Practice Group, he has served as lead or co-lead counsel in numerous cases and has helped achieve substantial settlements for shareholders. His most notable cases include *Dahl v. Bain Capital Partners, LLC*, obtaining more than $590 million for shareholders, and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, in which a settlement of up to $6.26 billion was recently preliminarily approved by the Eastern District of New York. Thought to be the largest antitrust class action case in history, the case charges Visa, MasterCard and the country's major banks with violating federal law in the allegedly collusive manner in which rules are set in the industry, including rules requiring payment of ever-increasing interchange fees by merchants.

Additionally, Mitchell served as class counsel in the ISDAfix Benchmark action against 14 major banks and broker ICAP plc, obtaining $504.5 million for plaintiffs. Currently, Mitchell serves as court-appointed counsel in *In re Aluminum Warehousing Antitrust Litig.*, *City of Providence, Rhode Island v. BATS Global Markets Inc.*, *In re SSA Bonds Antitrust Litig.*, *In re Remicade Antitrust Litig.* and *In re 1-800 Contacts Antitrust Litig.*

Education

B.A., University of Richmond, 1995; J.D., University of San Diego School of Law, 1998

Honors / Awards

Member, Enright Inn of Court; Best Lawyer in America, *Best Lawyers*®, 2018-2019; Super Lawyer, 2016-2019; Honoree, Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2018; Antitrust Trailblazer, *The National Law Journal*, 2015; "Best of the Bar," *San Diego Business Journal*, 2014

Maureen E. Mueller | Partner

Maureen Mueller is a partner in the Firm's Boca Raton office, where her practice focuses on complex securities litigation. Mueller has helped recover more than $3 billion for investors. She was a member of the Firm's trial team in *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.), a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. She was also a member of the team of attorneys responsible for recovering a record-breaking $925 million for investors in the *UnitedHealth* litigation, *In re UnitedHealth Grp. Inc. PSLRA Litig.*, No. 06-CV-1216 (JMR/FLN) (D. Minn.), and served as co-lead counsel in *In re Wachovia Preferred Securities and Bond/Notes Litig.*, No. 09 Civ. 6351 (RJS) (S.D.N.Y.), which recovered $627 million. More recently, Mueller was part of the litigation team that secured a $64 million recovery for shareholders of Dana Corp. in *Plumbers & Pipefitters National Pension Fund v. Burns*, No. 3:05-cv-07393-JGC (N.D. Ohio), in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action. She was also a member of the team of attorneys that recovered $13 million in *Burges v. BancorpSouth, Inc.*, No. 3:14-cv-01564 (M.D. Tenn.), and represented investors in *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031-TSE-MSN (E.D. Va.), in which the district court has preliminarily approved a $108 million settlement.

Education

B.S., Trinity University, 2002; J.D., University of San Diego School of Law, 2007

Honors / Awards

Next Generation Lawyer, *The Legal 500*, 2018; Top Litigator Under 40, *Benchmark Litigation*, 2017; Top Women Lawyer, *Daily Journal*, 2017; Recommended Lawyer, *The Legal 500*, 2017; Super Lawyer "Rising Star," 2015-2017; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2010; Lead Articles Editor, *San Diego Law Review*, University of San Diego School of Law

Danielle S. Myers | Partner

Danielle Myers is a partner in the Firm's San Diego office, and focuses her practice on complex securities litigation. Myers is one of the partners that oversees the Portfolio Monitoring Program® and provides legal recommendations to the Firm's institutional investor clients on their options to maximize recoveries in securities litigation, both within the United States and internationally, from inception to settlement. In addition, Myers advises the Firm's clients in connection with lead plaintiff applications and has secured appointment of the Firm's clients as lead plaintiff in over 100 cases, including *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031 (E.D. Va.), *Evellard v. LendingClub Corp.*, No. 3:16-cv-02627 (N.D. Cal.), *In re Plains All American Pipeline, L.P. Sec. Litig.*, No. 4:15-cv-02404 (S.D. Tex.), *Marcus v. J.C. Penney Co., Inc.*, No. 6:13-cv-00736 (E.D. Tex.), *In re Hot Topic, Inc. Sec. Litig.*, No. 2:13-cv-02939 (C.D. Cal.), *Smilovits v. First Solar, Inc.*, No. 2:12-cv-00555 (D. Ariz.), and *In re Goldman Sachs Grp., Inc. Sec. Litig.*, No. 1:10-cv-03461 (S.D.N.Y.). Myers has obtained significant recoveries for shareholders in several cases, including: *Marcus v. J.C. Penney Co., Inc.*, No. 13-cv-00736 (E.D. Tex.) ($97.5 million recovery); *In re Hot Topic, Inc. Sec. Litig.*, No. 2:13-cv-02939 (C.D. Cal.) ($14.9 million recovery); *Genesee Cty. Emps.' Ret. Sys. v. Thornburg Mortg., Inc.*, No. 1:09-cv-00300 (D.N.M.) ($11.25 million recovery); *Goldstein v. Tongxin Int'l Ltd.*, No. 2:11-cv-00348 (C.D. Cal.) ($3 million recovery); and *Lane v. Page*, No. Civ-06-1071 (D.N.M.) (pre-merger increase in cash consideration and post-merger cash settlement). Myers is also a frequent lecturer on securities fraud and corporate governance reform at conferences and events around the world.

Education

B.A., University of California at San Diego, 1997; J.D., University of San Diego, 2008

Honors / Awards

Future Star, *Benchmark Litigation*, 2019; Super Lawyer "Rising Star," 2015-2018; Next Generation Lawyer, *The Legal 500*, 2017-2018; One of the "Five Associates to Watch in 2012," *Daily Journal*; Member, *San Diego Law Review*; CALI Excellence Award in Statutory Interpretation

Eric I. Niehaus | Partner

Eric Niehaus is a partner in the Firm's San Diego office, where his practice focuses on complex securities and derivative litigation. His efforts have resulted in numerous multi-million dollar recoveries to shareholders and extensive corporate governance changes. Recent examples include: *In re NYSE Specialists Sec. Litig.* (S.D.N.Y.); *In re Novatel Wireless Sec. Litig.* (S.D. Cal.); *Batwin v. Occam Networks, Inc.* (C.D. Cal.); *Commc'ns Workers of Am. Plan for Emps.' Pensions and Death Benefits v. CSK Auto Corp.* (D. Ariz.); *Marie Raymond Revocable Tr. v. Mat Five* (Del. Ch.); and *Kelleher v. ADVO, Inc.* (D. Conn.). Niehaus is currently prosecuting cases against several financial institutions arising from their role in the collapse of the mortgage-backed securities market. Prior to joining the Firm, Niehaus worked as a Market Maker on the American Stock Exchange in New York, and the Pacific Stock Exchange in San Francisco.

Education

B.S., University of Southern California, 1999; J.D., California Western School of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; J.D., *Cum Laude*, California Western School of Law, 2005; Member, *California Western Law Review*

Brian O. O'Mara | Partner

Brian O'Mara is a partner in the Firm's San Diego office. His practice focuses on complex securities and antitrust litigation. Since 2003, O'Mara has served as lead or co-lead counsel in numerous shareholder and antitrust actions, including: *Bennett v. Sprint Nextel Corp*. (D. Kan.) ($131 million recovery); *In re CIT Grp. Inc. Sec. Litig*. (S.D.N.Y.) ($75 million recovery); *In re MGM Mirage Sec. Litig*. (D. Nev.) ($75 million recovery); *C.D.T.S. No. 1 v. UBS AG* (S.D.N.Y.); *In re Aluminum Warehousing Antitrust Litig*. (S.D.N.Y.); and *Alaska Elec. Pension Fund v. Bank of Am. Corp*. (S.D.N.Y.). Most recently, O'Mara served as class counsel in the ISDAfix Benchmark action against 14 major banks and broker ICAP plc, obtaining $504.5 million for plaintiffs.

O'Mara has been responsible for a number of significant rulings, including*: Alaska Elec. Pension Fund v. Bank of Am. Corp.*, 175 F. Supp. 3d 44 (S.D.N.Y. 2016); *Bennett v. Sprint Nextel Corp.*, 298 F.R.D. 498 (D. Kan. 2014); *In re MGM Mirage Sec. Litig.*, 2013 U.S. Dist. LEXIS 139356 (D. Nev. 2013*); In re Constar Int'l, Inc. Sec. Litig.*, 2008 U.S. Dist. LEXIS 16966 (E.D. Pa. 2008), *aff'd*, 585 F.3d 774 (3d Cir. 2009); *In re Direct Gen. Corp. Sec. Litig.*, 2006 U.S. Dist. LEXIS 56128 (M.D. Tenn. 2006); and *In re Dura Pharm., Inc. Sec. Litig.*, 452 F. Supp. 2d 1005 (S.D. Cal. 2006). Prior to joining the Firm, he served as law clerk to the Honorable Jerome M. Polaha of the Second Judicial District Court of the State of Nevada.

Education

B.A., University of Kansas, 1997; J.D., DePaul University, College of Law, 2002

Honors / Awards

Super Lawyer, 2016-2019; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2018; CALI Excellence Award in Securities Regulation, DePaul University, College of Law

Lucas F. Olts | Partner

Luke Olts is a partner in the Firm's San Diego office, where his practice focuses on securities litigation on behalf of individual and institutional investors. Olts has recently focused on litigation related to residential mortgage-backed securities, and has served as lead counsel or co-lead counsel in some of the largest recoveries arising from the collapse of the mortgage market. For example, he was a member of the team that recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.*, and a member of the litigation team responsible for securing a $272 million settlement on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* Olts also served as co-lead counsel in *In re Wachovia Preferred Securities and Bond/Notes Litig.*, which recovered $627 million under the Securities Act of 1933. He also served as lead counsel in *Siracusano v. Matrixx Initiatives, Inc.*, in which the U.S. Supreme Court unanimously affirmed the decision of the Ninth Circuit that plaintiffs stated a claim for securities fraud under §10(b) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. Prior to joining the Firm, Olts served as a Deputy District Attorney for the County of Sacramento, where he tried numerous cases to verdict, including crimes of domestic violence, child abuse and sexual assault.

Education

B.A., University of California, Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Future Star, *Benchmark Litigation*, 2018-2019; Next Generation Lawyer, *The Legal 500*, 2017; Top Litigator Under 40, *Benchmark Litigation*, 2017; Under 40 Hotlist, *Benchmark Litigation*, 2016

Steven W. Pepich | Partner

Steve Pepich is a partner in the Firm's San Diego office. His practice has focused primarily on securities class action litigation, but has also included a wide variety of complex civil cases, including representing plaintiffs in mass tort, royalty, civil rights, human rights, ERISA and employment law actions. Pepich has participated in the successful prosecution of numerous securities class actions, including: *Carpenters Health & Welfare Fund v. Coca-Cola Co.*, No. 1:00-CV-2838 ($137.5 million recovery); *In re Fleming Cos. Inc. Sec. & Derivative Litig.*, No. 5-03-MD-1530 ($95 million recovered); *In re Boeing Sec. Litig.*, No. C-97-1715Z ($92 million recovery); *In re Louisiana-Pacific Corp. Sec. Litig.*, No. C-95-707 ($65 million recovery); *Haw. Structural Ironworkers Pension Trust Fund v. Calpine Corp.*, No. 1-04-CV-021465 ($43 million recovery); *In re Advanced Micro Devices Sec. Litig.*, No. C-93-20662 ($34 million recovery); and *Gohler v. Wood*, No. 92-C-181 ($17.2 million recovery). Pepich was a member of the plaintiffs' trial team in *Mynaf v. Taco Bell Corp.*, which settled after two months of trial on terms favorable to two plaintiff classes of restaurant workers for recovery of unpaid wages. He was also a member of the plaintiffs' trial team in *Newman v. Stringfellow* where, after a nine-month trial in Riverside, California, all claims for exposure to toxic chemicals were ultimately resolved for $109 million.

Education

B.S., Utah State University, 1980; J.D., DePaul University, 1983

Daniel J. Pfefferbaum | Partner

Daniel Pfefferbaum is a partner in the Firm's San Francisco office, where his practice focuses on complex securities litigation. He has been a member of litigation teams that have recovered more than $100 million for investors, including: *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* ($65 million recovery); *In re PMI Grp., Inc. Sec. Litig.* ($31.25 million recovery); *Cunha v. Hansen Natural Corp.* ($16.25 million recovery); *In re Accuray Inc. Sec. Litig.* ($13.5 million recovery); and *Twinde v. Threshold Pharm., Inc.* ($10 million recovery). Pfefferbaum was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members are eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Education

B.A., Pomona College, 2002; J.D., University of San Francisco School of Law, 2006; LL.M. in Taxation, New York University School of Law, 2007

Honors / Awards

Future Star, *Benchmark Litigation*, 2018-2019; 40 & Under Hot List, *Benchmark Litigation*, 2016-2018; Top 40 Under 40, *Daily Journal*, 2017; Super Lawyer "Rising Star," 2013-2017

Theodore J. Pintar | Partner

Ted Pintar is a partner in the Firm's San Diego office. Pintar has over 20 years of experience prosecuting securities fraud actions and derivative actions and over 15 years of experience prosecuting insurance-related consumer class actions, with recoveries in excess of $1 billion. He was part of the litigation team in the AOL Time Warner state and federal court securities opt-out actions, which arose from the 2001 merger of America Online and Time Warner. These cases resulted in a global settlement of $618 million. Pintar was also on the trial team in *Knapp v. Gomez*, which resulted in a plaintiff's verdict. Pintar has successfully prosecuted several RICO cases involving the deceptive sale of deferred annuities, including cases against Allianz Life Insurance Company of North America ($250 million), American Equity Investment Life Insurance Company ($129 million), Midland National Life Insurance Company ($80 million) and Fidelity & Guarantee Life Insurance Company ($53 million). He has participated in the successful prosecution of numerous other insurance and consumer class actions, including: (i) actions against major life insurance companies such as Manufacturer's Life ($555 million initial estimated settlement value) and Principal Mutual Life Insurance Company ($380+ million) involving the deceptive sale of life insurance; (ii) actions against major homeowners insurance companies such as Allstate ($50 million) and Prudential Property and Casualty Co. ($7 million); (iii) actions against automobile insurance companies such as the Auto Club and GEICO; and (iv) actions against Columbia House ($55 million) and BMG Direct, direct marketers of CDs and cassettes. Additionally, Pintar has served as a panelist for numerous Continuing Legal Education seminars on federal and state court practice and procedure.

Education

B.A., University of California, Berkeley, 1984; J.D., University of Utah College of Law, 1987

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Super Lawyer, 2014-2017; CAOC Consumer Attorney of the Year Award Finalist, 2015; Note and Comment Editor, *Journal of Contemporary Law*, University of Utah College of Law; Note and Comment Editor, *Journal of Energy Law and Policy*, University of Utah College of Law

Willow E. Radcliffe | Partner

Willow Radcliffe is a partner in the Firm's San Francisco office and concentrates her practice on securities class action litigation in federal court. Radcliffe has been significantly involved in the prosecution of numerous securities fraud claims, including actions filed against Flowserve, NorthWestern and Ashworth, and has represented plaintiffs in other complex actions, including a class action against a major bank regarding the adequacy of disclosures made to consumers in California related to Access Checks. Prior to joining the Firm, she clerked for the Honorable Maria-Elena James, Magistrate Judge for the United States District Court for the Northern District of California.

Education

B.A., University of California, Los Angeles 1994; J.D., Seton Hall University School of Law, 1998

Honors / Awards

J.D., *Cum Laude*, Seton Hall University School of Law, 1998; Most Outstanding Clinician Award; Constitutional Law Scholar Award

Mark S. Reich | Partner

Mark Reich is a partner in the Firm's Melville office. Reich focuses his practice on challenging unfair mergers and acquisitions in courts throughout the country. Reich's notable cases include: *In re Aramark Corp. S'holders Litig.*, where he achieved a $222 million increase in consideration paid to shareholders of Aramark and a substantial reduction to management's voting power – from 37% to 3.5% – in connection with the approval of the going-private transaction; *In re Delphi Fin. Grp. S'holders Litig.*, resulting in a $49 million post-merger settlement for Class A Delphi shareholders; and *In re TD Banknorth S'holders Litig.*, where Reich played a significant role in raising the inadequacy of the $3 million initial settlement, which the court rejected as wholly inadequate, and later resulted in a vastly increased $50 million recovery.

Reich has also played a central role in other shareholder related litigation. His cases include *In re Gen. Elec. Co. ERISA Litig.*, resulting in structural changes to company's 401(k) plan valued at over $100 million, benefiting current and future plan participants, and *In re Doral Fin. Corp. Sec. Litig.*, obtaining a $129 million recovery for shareholders in a securities fraud litigation.

Education

B.A., Queens College, 1997; J.D., Brooklyn Law School, 2000

Honors / Awards

Super Lawyer, 2013-2018; Member, *The Journal of Law and Policy*, Brooklyn Law School; Member, Moot Court Honor Society, Brooklyn Law School

Jack Reise | Partner

Jack Reise is a partner in the Firm's Boca Raton office. Devoted to protecting the rights of those who have been harmed by corporate misconduct, his practice focuses on class action litigation (including securities fraud, shareholder derivative actions, consumer protection, antitrust, and unfair and deceptive insurance practices). Reise also dedicates a substantial portion of his practice to representing shareholders in actions brought under the federal securities laws. He is currently serving as lead counsel in more than a dozen cases nationwide. As lead counsel, Reise represented investors in a series of cases involving mutual funds charged with improperly valuating their net assets, which settled for a total of more than $50 million. Other notable actions include: *In re NewPower Holdings Sec. Litig.* ($41 million settlement); *In re Red Hat Sec. Litig.* ($20 million settlement); and *In re AFC Enters., Inc. Sec. Litig.* ($17.2 million settlement). Prior to joining the Firm, Reise represented individuals suffering the debilitating effects of asbestos exposure back in the 1950s and 1960s.

Education

B.A., Binghamton University, 1992; J.D., University of Miami School of Law, 1995

Honors / Awards

American Jurisprudence Book Award in Contracts; J.D., *Cum Laude*, University of Miami School of Law, 1995; *University of Miami Inter-American Law Review*, University of Miami School of Law

Darren J. Robbins | Partner

Darren Robbins is a founding partner of Robbins Geller Rudman & Dowd LLP. Over the last two decades, he has served as lead counsel in more than 100 securities class actions and has recovered billions of dollars for injured shareholders. Robbins has obtained significant recoveries in a number of actions arising out of wrongdoing related to the issuance of residential mortgage-backed securities, including the case against Goldman Sachs ($272 million recovery). Robbins also served as co-lead counsel in connection with a $627 million recovery for investors in *In re Wachovia Preferred Securities & Bond/Notes Litig.*, one of the largest credit-crisis settlements involving Securities Act claims. Robbins also recently served as lead counsel in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders.

One of the hallmarks of Robbins' practice has been his focus on corporate governance reform. In *UnitedHealth*, a securities fraud class action arising out of an options backdating scandal, Robbins represented lead plaintiff CalPERS and was able to obtain the cancellation of more than 3.6 million stock options held by the company's former CEO and secure a record $925 million cash recovery for shareholders. Robbins also negotiated sweeping corporate governance reforms, including the election of a shareholder-nominated director to the company's board of directors, a mandatory holding period for shares acquired via option exercise, and compensation reforms that tied executive pay to performance. Recently, Robbins led a shareholder derivative action brought by several pension funds on behalf of Community Health Systems, Inc. The case yielded a $60 million payment to Community Health, as well as corporate governance reforms that included two shareholder-nominated directors, the creation and appointment of a Healthcare Law Compliance Coordinator, the implementation of an executive compensation clawback in the event of a restatement, the establishment of an insider trading controls committee, and the adoption of a political expenditure disclosure policy.

Education

B.S., University of Southern California, 1990; M.A., University of Southern California, 1990; J.D., Vanderbilt Law School, 1993

Honors / Awards

Leading Lawyer in America, *Lawdragon*, 2006-2007, 2009-2019; Benchmark California Star, *Benchmark Litigation*, 2019; State Litigation Star, *Benchmark Litigation*, 2019; Best Lawyer in America, *Best Lawyers®*, 2010-2019; Super Lawyer, 2013-2019; Leading Lawyer, *Chambers USA*, 2014-2018; Local Litigation Star, *Benchmark Litigation*, 2013-2018; Lawyer of the Year, *Best Lawyers®*, 2017; Influential Business Leader, *San Diego Business Journal*, 2017; Litigator of the Year, *Our City San Diego,* 2017; Recommended Lawyer, *The Legal 500*, 2011, 2017; Top 50 Lawyers in San Diego, *Super Lawyers Magazine*, 2015; One of the Top 100 Lawyers Shaping the Future, *Daily Journal*; One of the "Young Litigators 45 and Under," *The American Lawyer*; Attorney of the Year, *California Lawyer*; Managing Editor, *Vanderbilt Journal of Transnational Law*, Vanderbilt Law School

Robert J. Robbins | Partner

Robert Robbins is a partner in the Firm's Boca Raton office. He focuses his practice on investigating securities fraud, initiating securities class actions, and helping institutional and individual shareholders litigate their claims to recover investment losses caused by fraud. Representing shareholders in all aspects of class actions brought pursuant to the federal securities laws, Robbins provides counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for investors. Robbins has been a member of litigation teams responsible for the successful prosecution of many securities class actions, including *Hospira* ($60 million recovery); *3D Systems* ($50 million); *CVS Caremark* ($48 million recovery); *Baxter International* ($42.5 million recovery); *R.H. Donnelley* ($25 million recovery); *Spiegel* ($17.5 million recovery); *TECO Energy* ($17.35 million recovery); *AFC Enterprises* ($17.2 million recovery); *Accretive Health* ($14 million recovery); *Lender Processing Services* ($14 million recovery); *Imperial Holdings* ($12 million recovery); *Mannatech* ($11.5 million recovery); *Newpark Resources* ($9.24 million recovery); *Gilead Sciences* ($8.25 million recovery); *TCP International* ($7.175 million recovery); *Cryo Cell International* ($7 million recovery); *Gainsco* ($4 million recovery); and *Body Central* ($3.425 million recovery). Robbins is currently representing investors in securities fraud litigation against Valeant Pharmaceuticals International, Inc. (D.N.J.).

Education

B.S., University of Florida, 1999; J.D., University of Florida College of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; J.D., High Honors, University of Florida College of Law, 2002; Member, *Journal of Law and Public Policy*, University of Florida College of Law; Member, *Phi Delta Phi*, University of Florida College of Law; *Pro bono* certificate, Circuit Court of the Eighth Judicial Circuit of Florida; Order of the Coif

Henry Rosen | Partner

Henry Rosen is a partner in the Firm's San Diego office, where he is a member of the Hiring Committee and Technology Committee, the latter of which focuses on applications to digitally manage documents produced during litigation and internally generate research files. He has significant experience prosecuting every aspect of securities fraud class actions and has obtained more than $1 billion on behalf of defrauded investors. Prominent cases include *In re Cardinal Health, Inc. Sec. Litig.*, in which Rosen recovered $600 million for defrauded shareholders. This $600 million settlement is the largest recovery ever in a securities fraud class action in the Sixth Circuit, and remains one of the largest settlements in the history of securities fraud litigation. Additional recoveries include: *Jones v. Pfizer Inc.* ($400 million); *In re First Energy* ($89.5 million); *In re CIT Grp. Inc. Sec. Litig* ($75 million); *Stanley v. Safeskin Corp.* ($55 million); *In re Storage Tech. Corp. Sec. Litig.* ($55 million); and *Rasner v. Sturm* (FirstWorld Communications) ($25.9 million).

Education

B.A., University of California, San Diego, 1984; J.D., University of Denver, 1988

Honors / Awards

Editor-in-Chief, *University of Denver Law Review*, University of Denver

David A. Rosenfeld | Partner

David Rosenfeld is a partner in the Firm's Melville office. He has focused his practice of law for more than 15 years in the areas of securities litigation and corporate takeover litigation. He has been appointed as lead counsel in dozens of securities fraud lawsuits and has successfully recovered hundreds of millions of dollars for defrauded shareholders. Rosenfeld works on all stages of litigation, including drafting pleadings, arguing motions and negotiating settlements. Most recently, he was on the team of Robbins Geller attorneys who obtained a $34.5 million recovery in *Patel v. L-3 Communications Holdings, Inc.*, which represents a high percentage of damages that plaintiffs could reasonably expect to be recovered at trial and is more than eight times higher than the average settlement of cases with comparable investor losses.

Additionally, Rosenfeld led the Robbins Geller team in recovering in excess of $34 million for investors in Overseas Shipholding Group, which represented an outsized recovery of 93% of bond purchasers' damages and 28% of stock purchasers' damages. The creatively structured settlement included more than $15 million paid by a bankrupt entity. Rosenfeld also led the effort that resulted in the recovery of nearly 90% of losses for investors in Austin Capital, a sub-feeder fund of Bernard Madoff. In connection with this lawsuit, Rosenfeld met with and interviewed Madoff in federal prison. Rosenfeld has also achieved remarkable recoveries against companies in the financial industry. In addition to recovering $70 million for investors in Credit Suisse Group, and having been appointed lead counsel in the securities fraud lawsuit against First BanCorp (which provided shareholders with a $74.25 million recovery), he recently settled claims against Barclays for $14 million, or 20% of investors' damages, for statements made about its LIBOR practices.

Education

B.S., Yeshiva University, 1996; J.D., Benjamin N. Cardozo School of Law, 1999

Honors / Awards

Advisory Board Member of *Stafford's Securities Class Action Reporter*; Future Star, *Benchmark Litigation*, 2016-2019; Recommended Lawyer, *The Legal 500*, 2018; Super Lawyer, 2014-2018; Super Lawyer "Rising Star," 2011-2013

Robert M. Rothman | Partner

Robert Rothman is a partner in the Firm's Melville office. Rothman has extensive experience litigating cases involving investment fraud, consumer fraud and antitrust violations. He also lectures to institutional investors throughout the world. Rothman has served as lead counsel in numerous class actions alleging violations of securities laws, including cases against First Bancorp ($74.25 million recovery), CVS ($48 million recovery), Popular, Inc. ($37.5 million recovery), and iStar Financial, Inc. ($29 million recovery). He actively represents shareholders in connection with going-private transactions and tender offers. For example, in connection with a tender offer made by Citigroup, Rothman secured an increase of more than $38 million over what was originally offered to shareholders.

Education

B.A., State University of New York at Binghamton, 1990; J.D., Hofstra University School of Law, 1993

Honors / Awards

Super Lawyer, 2011, 2013-2018; Dean's Academic Scholarship Award, Hofstra University School of Law; J.D., with Distinction, Hofstra University School of Law, 1993; Member, *Hofstra Law Review*, Hofstra University School of Law

Samuel H. Rudman | Partner

Sam Rudman is a founding member of the Firm, a member of the Firm's Executive and Management Committees, and manages the Firm's New York offices. His 25-year securities practice focuses on recognizing and investigating securities fraud, and initiating securities and shareholder class actions to vindicate shareholder rights and recover shareholder losses. A former attorney with the SEC, Rudman has recovered hundreds of millions of dollars for shareholders, including a $200 million recovery in *Motorola*, a $129 million recovery in *Doral Financial*, an $85 million recovery in *Blackstone*, a $74 million recovery in *First BanCorp*, a $65 million recovery in *Forest Labs*, a $50 million recovery in *TD Banknorth*, a $48 million recovery in *CVS Caremark*, and a $34.5 million recovery in *L-3 Communications Holdings*.

Education

B.A., Binghamton University, 1989; J.D., Brooklyn Law School, 1992

Honors / Awards

National Practice Area Star, *Benchmark Litigation*, 2019; Leading Lawyer in America, *Lawdragon*, 2016-2019; Local Litigation Star, *Benchmark Litigation*, 2013-2019; Litigation Star, *Benchmark Litigation*, 2013, 2017-2019; Leading Lawyer, *Chambers USA*, 2014-2018; Recommended Lawyer, *The Legal 500*, 2018; Super Lawyer, 2007-2018; Dean's Merit Scholar, Brooklyn Law School; Moot Court Honor Society, Brooklyn Law School; Member, *Brooklyn Journal of International Law*, Brooklyn Law School

Joseph Russello | Partner

Joseph Russello is a partner in the Firm's Melville office. He principally prosecutes violations of the federal securities laws and breaches of fiduciary duty on behalf of individual and institutional investors. During his tenure at the Firm, Russello has achieved significant results in complex and challenging cases.

Currently, Russello is leading the Firm's efforts in litigating securities claims against several companies in the Commercial Division of the New York State Supreme Court, New York County, in the wake of the U.S. Supreme Court's decision in *Cyan, Inc. v. Beaver Cty. Emps.' Ret. Fund*, _ U.S. _, 138 S. Ct. 1061 (2018), which confirmed that state courts have concurrent jurisdiction of claims under the Securities Act of 1933. He is also prosecuting federal securities fraud cases against Telefonaktiebolaget LM Ericsson (known as Ericsson) and former executives and directors of Allied Nevada Gold Corporation, the latter of which was the subject of a favorable decision from the Ninth Circuit Court of Appeals reversing dismissal and reinstating the claims in their entirety (*In re Allied Nev. Gold Corp. Sec. Litig.*, 743 F. App'x 887 (9th Cir. 2018) (summary order)).

Recently, Russello led the team responsible for recovering $50 million in litigation against BHP Billiton, an Australian-based mining company accused of failing to disclose significant safety problems at the Fundão iron-ore dam, in Brazil. Together with Brazilian mining company Vale S.A., BHP owned Samarco Mineração S.A., which operated the mining complex at which the Fundão dam was located. On November 5, 2015, the dam collapsed and unleashed a torrent of mining waste, resulting in the death of 19 people, the destruction of the town of Bento Rodrigues, and the decimation of the surrounding environment. Even today, this event is regarded as the worst environmental disaster in Brazil's history. Russello and a team from Robbins Geller represented two institutional investors and an individual in defeating BHP's motion to dismiss (*In re BHP Billiton Ltd. Sec. Litig.*, 276 F. Supp. 3d 65 (S.D.N.Y. 2017)), and prosecuted and ultimately resolved the case on behalf of two sets of purchasers of American Depositary Shares (ADSs) trading on the New York Stock Exchange. The proposed settlement – which represents, by some estimates, almost 20% of total recoverable damages – is pending final approval, and the hearing is scheduled to take place in April 2019.

Education

B.A., Gettysburg College, 1998; J.D., Hofstra University School of Law, 2001

Honors / Awards

Super Lawyer, 2014-2018; *Law360* Securities Editorial Advisory Board, 2017

Scott H. Saham | Partner

Scott Saham is a partner in the Firm's San Diego office, where his practice focuses on complex securities litigation. He is licensed to practice law in both California and Michigan. Most recently, Saham was a member of the litigation team that obtained a $125 million settlement in *In re LendingClub Securities Litigation*, a settlement that ranks among the top ten largest securities recoveries ever in the Northern District of California. He was also part of the litigation teams in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee, and *Luna v. Marvell Tech. Grp., Ltd.*, which resulted in a $72.5 million settlement that represents approximately 24% to 50% of the best estimate of classwide damages suffered by investors. He also served as lead counsel prosecuting the *Pharmacia* securities litigation in the District of New Jersey, which resulted in a $164 million recovery. Additionally, Saham was lead counsel in the *In re Coca-Cola Sec. Litig.* in the Northern District of Georgia, which resulted in a $137.5 million recovery after nearly eight years of litigation. He also obtained reversal from the California Court of Appeal of the trial court's initial dismissal of the landmark *Countrywide* mortgage-backed securities action. This decision is reported as *Luther v. Countrywide Fin. Corp.*, 195 Cal. App. 4th 789 (2011), and following this ruling that revived the action the case settled for $500 million.

Education

B.A., University of Michigan, 1992; J.D., University of Michigan Law School, 1995

Jessica T. Shinnefield | Partner

Jessica Shinnefield is a partner in the Firm's San Diego office and currently focuses on initiating, investigating and prosecuting new securities fraud class actions. Shinnefield was a member of the litigation teams that obtained significant recoveries for investors in cases such as *AOL Time Warner*, *Cisco Systems*, *Aon* and *Petco*. Shinnefield was also a member of the litigation team prosecuting actions against investment banks and leading national credit rating agencies for their roles in structuring and rating structured investment vehicles backed by toxic assets. These cases are among the first to successfully allege fraud against the rating agencies, whose ratings have traditionally been protected by the First Amendment. She is currently litigating several securities actions, including an action against Omnicare, in which she helped obtain a favorable ruling from the U.S. Supreme Court.

Education

B.A., University of California at Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Super Lawyer "Rising Star," 2015-2019; 40 & Under Hot List, *Benchmark Litigation*, 2018; B.A., *Phi Beta Kappa*, University of California at Santa Barbara, 2001

Elizabeth A. Shonson | Partner

Elizabeth Shonson is a partner in the Firm's Boca Raton office. She concentrates her practice on representing investors in class actions brought pursuant to the federal securities laws. Shonson has litigated numerous securities fraud class actions nationwide, helping achieve significant recoveries for aggrieved investors. She was a member of the litigation teams responsible for recouping millions of dollars for defrauded investors, including: *In re Massey Energy Co. Sec. Litig.* (S.D. W.Va.) ($265 million); *Nieman v. Duke Energy Corp.* (W.D.N.C.) ($146.25 million recovery); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps. Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Education

B.A., Syracuse University, 2001; J.D., University of Florida Levin College of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2016-2018; J.D., *Cum Laude*, University of Florida Levin College of Law, 2005; Editor-in-Chief, *Journal of Technology Law & Policy*; Phi Delta Phi; B.A., with Honors, *Summa Cum Laude*, Syracuse University, 2001; Phi Beta Kappa

Trig Smith | Partner

Trig Smith is a partner in the Firm's San Diego office where he focuses his practice on complex securities litigation. He has been involved in the prosecution of numerous securities class actions that have resulted in over a billion dollars in recoveries for investors. His cases have included: *In re Cardinal Health, Inc. Sec. Litig.* ($600 million recovery); *Jones v. Pfizer Inc.* ($400 million recovery); *Silverman v. Motorola, Inc.* ($200 million recovery); and *City of Livonia Emps.' Ret. Sys. v. Wyeth* ($67.5 million). Most recently, he was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Education

B.S., University of Colorado, Denver, 1995; M.S., University of Colorado, Denver, 1997; J.D., Brooklyn Law School, 2000

Honors / Awards

Member, *Brooklyn Journal of International Law*, Brooklyn Law School; CALI Excellence Award in Legal Writing, Brooklyn Law School

Mark Solomon | Partner

Mark Solomon is a founding partner in the Firm's San Diego office and leads its international litigation practice. Over the last 23 years, he has regularly represented United States- and United Kingdom-based pension funds, and asset managers in class and non-class securities litigation in federal and state courts throughout the United States. He has been admitted to the Bars of England and Wales (Barrister), Ohio and California, but now practices exclusively in California, as well as in various United States federal district and appellate courts.

Solomon has spearheaded the prosecution of many significant securities fraud cases. He has obtained multi-hundred million dollar recoveries for plaintiffs in pre-trial settlements and significant corporate governance reforms designed to limit recidivism and promote appropriate standards. He litigated, through the rare event of trial, the securities class action against Helionetics Inc. and its executives, where he won a $15.4 million federal jury verdict. Prior to the most recent financial crisis, he was instrumental in obtaining some of the first mega-recoveries in the field in California and Texas, serving as co-lead counsel in *In re Informix Corp. Sec. Litig.* (N.D. Cal.) and recovering $131 million for Informix investors; and serving as co-lead counsel in *Schwartz v. TXU Corp.* (N.D. Tex.), where he helped obtain a recovery of over $149 million for a class of purchasers of TXU securities. Solomon is currently counsel to a number of pension funds serving as lead plaintiffs in cases throughout the United States.

Education

B.A., Trinity College, Cambridge University, England, 1985; L.L.M., Harvard Law School, 1986; Inns of Court School of Law, Degree of Utter Barrister, England, 1987

Honors / Awards

Super Lawyer, 2017-2018; Recommended Lawyer, *The Legal 500*, 2016-2017; Lizette Bentwich Law Prize, Trinity College, 1983 and 1984; Hollond Travelling Studentship, 1985; Harvard Law School Fellowship, 1985-1986; Member and Hardwicke Scholar of the Honourable Society of Lincoln's Inn

Douglas Wilens | Partner

Douglas Wilens is a partner in the Firm's Boca Raton office. Wilens is a member of the Firm's appellate practice group, participating in numerous appeals in federal and state courts across the country. Most notably, Wilens handled successful appeals in the First Circuit Court of Appeals in *Mass. Ret. Sys. v. CVS Caremark Corp.*, 716 F.3d 229 (1st Cir. 2013) (reversal of order granting motion to dismiss), and in the Fifth Circuit Court of Appeals in *Lormand v. US Unwired, Inc.*, 565 F.3d 228 (5th Cir. 2009) (reversal of order granting motion to dismiss). Wilens is also involved in the Firm's lead plaintiff practice group, handling lead plaintiff issues arising under the PSLRA.

Prior to joining the Firm, Wilens was an associate at a nationally recognized firm, where he litigated complex actions on behalf of numerous professional sports leagues, including the National Basketball Association, the National Hockey League and Major League Soccer. He has also served as an adjunct professor at Florida Atlantic University and Nova Southeastern University, where he taught undergraduate and graduate-level business law classes.

Education

B.S., University of Florida, 1992; J.D., University of Florida College of Law, 1995

Honors / Awards

Book Award for Legal Drafting, University of Florida College of Law; J.D., with Honors, University of Florida College of Law, 1995

Shawn A. Williams | Partner

Shawn Williams is a partner in the Firm's San Francisco office and a member of the Firm's Management Committee. His practice focuses on securities class actions. Williams was among the lead class counsel for the Firm recovering investor losses in notable cases, including: *In re Krispy Kreme Doughnuts, Inc. Sec. Litig.* ($75 million); *In re Veritas Software Corp. Sec. Litig.* ($35 million); and *In re Cadence Design Sys. Sec. Litig.* ($38 million). Williams is also among the Firm's lead attorneys prosecuting shareholder derivative actions, securing tens of millions of dollars in cash recoveries and negotiating the implementation of comprehensive corporate governance enhancements, such as *In re McAfee, Inc. Derivative Litig.*; *In re Marvell Tech. Grp. Ltd. Derivative Litig.*; *In re KLA Tencor S'holder Derivative Litig.*; and *The Home Depot, Inc. Derivative Litig*. Prior to joining the Firm in 2000, Williams served for 5 years as an Assistant District Attorney in the Manhattan District Attorney's Office, where he tried over 20 cases to New York City juries and led white-collar fraud grand jury investigations.

Education

B.A., The State of University of New York at Albany, 1991; J.D., University of Illinois, 1995

Honors / Awards

Leading Lawyer in America, *Lawdragon*, 2018-2019; Super Lawyer, 2014-2017; Board Member, California Bar Foundation, 2012-2014

David T. Wissbroecker | Partner

David Wissbroecker is a partner in the Firm's San Diego and Chicago offices. He focuses his practice on securities class action litigation in the context of mergers and acquisitions, representing both individual shareholders and institutional investors. As part of the litigation team at Robbins Geller, Wissbroecker has helped secure monetary recoveries for shareholders that collectively exceed $1 billion. Wissbroecker has litigated numerous high profile cases in Delaware and other jurisdictions, including shareholder class actions challenging the acquisitions of Dole, Kinder Morgan, Del Monte Foods, Affiliated Computer Services, Intermix and Rural Metro. His practice has recently expanded to include numerous proxy fraud cases in federal court, along with shareholder document demand litigation in Delaware. Before joining the Firm, Wissbroecker served as a staff attorney for the United States Court of Appeals for the Seventh Circuit, and then as a law clerk for the Honorable John L. Coffey, Circuit Judge for the Seventh Circuit.

Education

B.A., Arizona State University, 1998; J.D., University of Illinois College of Law, 2003

Honors / Awards

Super Lawyer "Rising Star," 2015; J.D., *Magna Cum Laude*, University of Illinois College of Law, 2003; B.A., *Cum Laude*, Arizona State University, 1998

Christopher M. Wood | Partner

Christopher Wood is a partner in the Firm's Nashville office, where his practice focuses on complex securities litigation. He has been a member of litigation teams responsible for recovering hundreds of millions of dollars for investors, including: *In re Massey Energy Co. Sec. Litig.* ($265 million recovery); *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery); *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* ($65 million recovery); *In re Micron Tech., Inc. Sec. Litig.* ($42 million recovery); and *Winslow v. BancorpSouth, Inc.* ($29.5 million recovery).

Wood has provided *pro bono* legal services through the San Francisco Bar Association's Volunteer Legal Services Program, the Ninth Circuit's Pro Bono Program, Volunteer Lawyers & Professionals for the Arts, and Tennessee Justice for Our Neighbors.

Education

B.A., Vanderbilt University, 2003; J.D., University of San Francisco School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2011-2013, 2015-2018

Debra J. Wyman | Partner

Debra Wyman is a partner in the Firm's San Diego office. She specializes in securities litigation and has litigated numerous cases against public companies in state and federal courts that have resulted in over $1 billion in securities fraud recoveries. Wyman was a member of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery achieved approximately 70% of classwide damages, which as a percentage of damages significantly exceeds the median class action recovery of 2%-3% of damages. Wyman prosecuted the complex securities and accounting fraud case *In re HealthSouth Corp. Sec. Litig.*, one of the largest and longest-running corporate frauds in history, in which $671 million was recovered for defrauded HealthSouth investors. She was also part of the trial team that litigated *In re AT&T Corp. Sec. Litig.*, which was tried in the United States District Court, District of New Jersey, and settled after only two weeks of trial for $100 million. Most recently, Wyman was part of the litigation team that secured a $64 million recovery for Dana Corp. shareholders in *Plumbers & Pipefitters National Pension Fund v. Burns*, in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

Education

B.A., University of California Irvine, 1990; J.D., University of San Diego School of Law, 1997

Honors / Awards

Top Women Lawyer, *Daily Journal*, 2017; Litigator of the Year, *Our City San Diego*, 2017; Super Lawyer, 2016-2017

Laura M. Andracchio | Of Counsel

Laura Andracchio is Of Counsel in the Firm's San Diego office. Having first joined the Firm in 1997, she was a Robbins Geller partner for ten years prior to her role as Of Counsel. As a partner with the Firm, Andracchio led countless securities fraud cases against public companies throughout the country, recovering hundreds of millions of dollars for injured investors. Her current focus remains securities fraud litigation under the federal securities laws.

Andracchio was a lead member of the trial team in *In re AT&T Corp. Sec. Litig.*, recovering $100 million for the class after two weeks of trial in district court in New Jersey. Prior to trial, she managed and litigated the case, which was pending for four years. She also led the trial team in *Brody v. Hellman*, a case against Qwest and former directors of U.S. West seeking an unpaid dividend, recovering $50 million for the class, which was largely comprised of U.S. West retirees. Other cases Andracchio has litigated include *City of Hialeah Emps.' Ret. Sys. v. Toll Bros., Inc.*, *Ross v. Abercrombie & Fitch Co.*, *In re GMH Cmtys. Tr. Sec. Litig.*, *In re Vicuron Pharm., Inc. Sec. Litig.* and *In re Navarre Corp. Sec. Litig.* Most recently, her focus is residential mortgage-backed securities litigation on behalf of investors against Wall Street financial institutions.

Education

B.A., Bucknell University, 1986; J.D., Duquesne University School of Law, 1989

Honors / Awards

Order of the Barristers, J.D., with honors, Duquesne University School of Law, 1989

Randi D. Bandman | Of Counsel

Randi Bandman is Of Counsel in the Firm's Boca Raton office. Throughout her career, she has represented and advised hundreds of clients, including pension funds, managers, banks and hedge funds, such as the Directors Guild of America, Screen Actors Guild, Writers Guild of America and Teamster funds. Bandman's cases have yielded billions of dollars of recoveries. Notable cases include the AOL Time Warner, Inc. merger ($629 million), *In re Enron Corp. Sec. Litig.* ($7.2 billion), Private Equity litigation (*Dahl v. Bain Capital Partners, LLC*) ($590.5 million) and *In re WorldCom Sec. Litig.* ($657 million).

Bandman is currently representing plaintiffs in the Foreign Exchange Litigation pending in the Southern District of New York which alleges collusive conduct by the world's largest banks to fix prices in the $5.3 trillion a day foreign exchange market and in which billions of dollars have been recovered to date for injured plaintiffs. Bandman is part of the Robbins Geller Co-Lead Counsel team representing the class in the "High Frequency Trading" case, which accuses stock exchanges of giving unfair advantages to high-speed traders versus all other investors, resulting in billions of dollars being diverted. Bandman is also currently a member of the trial team in *In re Facebook Biometric Information Privacy Litigation*, concerning Facebook's alleged privacy violations through its collection of user's biometric identifiers without informed consent. Bandman was instrumental in the landmark state settlement with the tobacco companies for $12.5 billion. Bandman also led an investigation with congressional representatives on behalf of artists into allegations of "pay for play" tactics, represented Emmy winning writers with respect to their claims involving a long-running television series, represented a Hall of Fame sports figure, and negotiated agreements in connection with a major motion picture. Recently, Bandman was chosen to serve on the Law Firm Advisory Board of the Association of Media & Entertainment Counsel, an organization made up of thousands of attorneys from studios, networks, guilds, talent agencies and top media companies, dealing with protecting content distributed through a variety of formats worldwide.

Education

B.A., University of California, Los Angeles; J.D., University of Southern California

Lea Malani Bays | Of Counsel

Lea Malani Bays is Of Counsel in the Firm's San Diego office. She focuses on e-discovery issues, from preservation through production, and provides counsel to the Firm's multi-disciplinary, e-discovery team consisting of attorneys, forensic analysts and database professionals. Through her role as counsel to the e-discovery team, Bays is very familiar with the various stages of e-discovery, including identification of relevant electronically stored information, data culling, predictive coding protocols, privilege and responsiveness reviews, as well as having experience in post-production discovery through trial preparation. Through speaking at various events, she is also a leader in shaping the broader dialogue on e-discovery issues.

Bays was recently part of the litigation team that earned the approval of a $131 million settlement in favor of plaintiffs in *Bennett v. Sprint Nextel Corp*. The settlement, which resolved claims arising from Sprint Corporation's ill-fated merger with Nextel Communications in 2005, represents a significant recovery for the plaintiff class, achieved after five years of tireless effort by the Firm. Prior to joining Robbins Geller, Bays was a Litigation Associate at Kaye Scholer LLP's New York office. She has experience in a wide range of litigation, including complex securities litigation, commercial contract disputes, business torts, antitrust, civil fraud, and trust and estate litigation.

Education

B.A., University of California, Santa Cruz, 1997; J.D., New York Law School, 2007

Honors / Awards

J.D., *Magna Cum Laude*, New York Law School, 2007; Executive Editor, *New York Law School Law Review*; Legal Aid Society's Pro Bono Publico Award; NYSBA Empire State Counsel; Professor Stephen J. Ellmann Clinical Legal Education Prize; John Marshall Harlan Scholars Program, Justice Action Center

Mary K. Blasy | Of Counsel

Mary Blasy is Of Counsel to the Firm and is based in the Firm's Melville and Washington, D.C. offices. Her practice focuses on the investigation, commencement, and prosecution of securities fraud class actions and shareholder derivative suits. Blasy has recovered hundreds of millions of dollars for investors in securities fraud class actions against Reliance Acceptance Corp. ($66 million); Sprint Corp. ($50 million); Titan Corporation ($15+ million); Martha Stewart Omni-Media, Inc. ($30 million); and Coca-Cola Co. ($137.5 million). Blasy has also been responsible for prosecuting numerous complex shareholder derivative actions against corporate malefactors to address violations of the nation's securities, environmental and labor laws, obtaining corporate governance enhancements valued by the market in the billions of dollars.

In 2014, the Presiding Justice of the Appellate Division of the Second Department of the Supreme Court of the State of New York appointed Blasy to serve as a member of the Independent Judicial Election Qualification Commission, which reviews the qualifications of candidates seeking public election to New York State Supreme Courts in the 10th Judicial District. She also served on the *Law360* Securities Editorial Advisory Board from 2015 to 2016.

Education

B.A., California State University, Sacramento, 1996; J.D., UCLA School of Law, 2000

Honors / Awards

Super Lawyer, 2016-2018; *Law360* Securities Editorial Advisory Board, 2015-2016; Member, Independent Judicial Election Qualification Commission, 2014-present

Bruce Boyens | Of Counsel

Bruce Boyens is Of Counsel to the Firm. A private practitioner in Denver, Colorado since 1990, he specializes in consulting with labor unions on issues relating to labor and environmental law, labor organizing, labor education, union elections, internal union governance and alternative dispute resolutions. Boyens was a Regional Director for the International Brotherhood of Teamsters elections in 1991 and 1995. He developed and taught collective bargaining and labor law courses for the George Meany Center, the United Mine Workers of America, Transportation Workers Local 260, the Kentucky Nurses Association, among others.

In addition, Boyens served as the Western Regional Director and Counsel for the United Mine Workers from 1983-1990, where he was the chief negotiator in over 30 major agreements, and represented the United Mine Workers in all legal matters. From 1973-1977, he served as General Counsel to District 17 of the United Mine Workers Association, and also worked as an underground coal miner during that time.

Education

J.D., University of Kentucky College of Law, 1973; Harvard University, Certificate in Environmental Policy and Management

William K. Cavanagh, Jr. | Of Counsel

Bill Cavanagh is Of Counsel in the Firm's Washington, D.C. office. Cavanagh concentrates his practice in employee benefits law and works with the Firm's Institutional Outreach Team. Prior to joining Robbins Geller, Cavanagh was employed by Ullico for the past nine years, most recently as President of Ullico Casualty Group. The Ullico Casualty Group is the leading provider of fiduciary liability insurance for trustees in both the private as well as the public sector. Prior to that he was President of the of Ullico Investment Company.

Preceding Cavanagh's time at Ullico, he was a partner at the labor and employee benefits firm Cavanagh and O'Hara in Springfield, Illinois for 28 years. In that capacity, Cavanagh represented public pension funds, jointly trusteed Taft-Hartley, health, welfare, pension and joint apprenticeship funds advising on fiduciary and compliance issues both at the Board level as well as in administrative hearings, federal district courts and the United States Courts of Appeals. During the course of his practice, Cavanagh had extensive trial experience in state and the relevant federal district courts. Additionally, Cavanagh served as co-counsel on a number of cases representing trustees seeking to recover plan assets lost as a result of fraud in the marketplace.

Education

B.A., Georgetown University, 1974; J.D., John Marshall Law School, 1978

Christopher Collins | Of Counsel

Christopher Collins is Of Counsel in the Firm's San Diego office and his practice focuses on antitrust and consumer protection. Collins served as co-lead counsel in *Wholesale Elec. Antitrust Cases I & II*, charging an antitrust conspiracy by wholesale electricity suppliers and traders of electricity in California's newly deregulated wholesale electricity market wherein plaintiffs secured a global settlement for California consumers, businesses and local governments valued at more than $1.1 billion. He was also involved in California's tobacco litigation, which resulted in the $25.5 billion recovery for California and its local entities. Collins is currently counsel on the California Energy Manipulation antitrust litigation, the Memberworks upsell litigation, as well as a number of consumer actions alleging false and misleading advertising and unfair business practices against major corporations. He formerly served as a Deputy District Attorney for Imperial County where he was in charge of the Domestic Violence Unit.

Education

B.A., Sonoma State University, 1988; J.D., Thomas Jefferson School of Law, 1995

Patrick J. Coughlin | Of Counsel

Patrick Coughlin is Of Counsel to the Firm and is based in the San Diego office. He has been lead counsel for several major securities matters, including one of the earliest and largest class action securities cases to go to trial, *In re Apple Computer Sec. Litig.*, No. C-84-20148 (N.D. Cal.). Most recently, Coughlin was a member of the Firm's trial team in *Hsu v. Puma Biotechnology, Inc.*, No. SACV15-0865 (C.D. Cal.), a securities fraud class action that resulted in a verdict in favor of investors after a two-week jury trial.

Coughlin is currently representing merchants in *In re Payment Card Interchange Fee and Merchant Discount Litig.*, in which a settlement of up to $6.26 billion was recently preliminarily approved by the Eastern District of New York. Thought to be the largest antitrust class action case in history, the case charges Visa, MasterCard and the country's major banks with violating federal law in the allegedly collusive manner in which rules are set in the industry, including rules requiring payment of ever-increasing interchange fees by merchants. Coughlin was one of the lead attorneys who secured a historic $25 million recovery on behalf of approximately 7,000 Trump University students in two class actions against President Donald J. Trump, which means individual class members are eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Additional prominent securities class actions prosecuted by Coughlin include the *Enron* litigation, in which $7.2 billion was recovered; the *Qwest* litigation, in which a $445 million recovery was obtained; and the *HealthSouth* litigation, in which a $671 million recovery was obtained. Coughlin has also handled a number of large antitrust cases including the *Currency Conversion* cases in which $360 million was recovered for consumers and the Private Equity litigation (*Dahl v. Bain Capital Partners, LLC*) in which $590.5 million was recovered for investors. He also served as class counsel in the ISDAfix Benchmark action against 14 major banks and broker ICAP plc, obtaining $504.5 million for plaintiffs.

Education

B.S., Santa Clara University, 1977; J.D., Golden Gate University, 1983

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers*®, 2006-2019; Super Lawyer, 2004-2019; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Outstanding Antitrust Litigation Achievement in Private Law Practice, American Antitrust Institute, 2018; Senior Statesman, *Chambers USA*, 2014-2018; Antitrust Trailblazer, *The National Law Journal*, 2015; Top 100 Lawyers, *Daily Journal*, 2008; Leading Lawyers in America, *Lawdragon*, 2006, 2008-2009

Vicki Multer Diamond | Of Counsel

Vicki Multer Diamond is Of Counsel to the Firm and is based in the Firm's Melville office. She has over 25 years of experience as an investigator and attorney. Her practice at the Firm focuses on the initiation, investigation and prosecution of securities fraud class actions. Diamond played a significant role in the factual investigations and successful oppositions to the defendants' motions to dismiss in a number of cases, including *Tableau*, *One Main*, *Valeant* and *Orbital ATK*.

Diamond has served as an investigative consultant to several prominent law firms, corporations and investment firms. Before joining the Firm, she was an Assistant District Attorney in Brooklyn, New York where she served as a senior Trial Attorney in the Felony Trial Bureau, and was special counsel to the Special Commissioner of Investigations for the New York City schools, where she investigated and prosecuted crime and corruption within the New York City school system.

Education

B.A., State University of New York at Binghamton, 1990; J.D., Hofstra University School of Law, 1993

Honors / Awards

Member, *Hofstra Property Law Journal*, Hofstra University School of Law

Michael J. Dowd | Of Counsel

Mike Dowd was a founding partner of the Firm. He has practiced in the area of securities litigation for 20 years, prosecuting dozens of complex securities cases and obtaining significant recoveries for investors in cases such as *UnitedHealth* ($925 million), *WorldCom* ($657 million), *AOL Time Warner* ($629 million), *Qwest* ($445 million) and *Pfizer* ($400 million). Dowd served as lead trial counsel in *Jaffe v. Household Int'l, Inc.* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Dowd also served as the lead trial lawyer in *In re AT&T Corp. Sec. Litig.*, which was tried in the District of New Jersey and settled after only two weeks of trial for $100 million.

Dowd served as an Assistant United States Attorney in the Southern District of California from 1987-1991, and again from 1994-1998.

Education

B.A., Fordham University, 1981; J.D., University of Michigan School of Law, 1984

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Best Lawyer in America, *Best Lawyers*®, 2015-2019; Super Lawyer, 2010-2019; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Hall of Fame, *Lawdragon*, 2018; Recommended Lawyer, *The Legal 500*, 2016-2018; Litigator of the Year, *Our City San Diego*, 2017; Leading Lawyer in America, *Lawdragon*, 2014-2016; Litigator of the Week, *The American* Lawyer, 2015; Litigation Star, *Benchmark Litigation* 2013; Directorship 100, NACD Directorship, 2012; Attorney of the Year, *California Lawyer*, 2010; Top 100 Lawyers, *Daily Journal*, 2009; Director's Award for Superior Performance, United States Attorney's Office; B.A., *Magna Cum Laude*, Fordham University, 1981

L. Thomas Galloway | Of Counsel

Thomas Galloway is Of Counsel in the Firm's Washington D.C. office. He is the founding partner of Galloway & Associates, a law firm that concentrates in the representation of institutional investors – namely, public and multi-employer pension funds.

Galloway has authored several books and articles, including: *The American Response to Revolutionary Change: A Study of Diplomatic Recognition* (AEI Institute 1978); *American's Energy: Reports from the Nation* (Pantheon 1980); Contributor, *Coal Treastise* (Matthew Bender 1981); Contributor, *Mining in Germany, Great Britian, Australia, and the United States* 4 Harv. Envtl. L. Rev. 261 (Spring 1980); *A Miner's Bill of Rights*, 80 W. Va. L. Rev. 397 (1978); and Contributor, *Golden Dreams, Poisoned Streams* (Mineral Policy Center Washington D.C. 1997).

Galloway represents and/or provides consulting services for the following: National Wildlife Federation, Sierra Club, Friends of the Earth, United Mine Workers of America, Trout Unlimited, National Audubon Society, Natural Resources Defense Council, German Marshal Fund, Northern Cheyenne Indian Tribe, and Council of Energy Resource Tribes.

Education

B.A., Florida State University, 1967; J.D., University of Virginia School of Law, 1972

Honors / Awards

Articles Editor, *University of Virginia Law Review*, University of Virginia School of Law; *Phi Beta Kappa*, University of Virginia School of Law; Trial Lawyer of the Year in the United States, 2003

John K. Grant | Of Counsel

John Grant is Of Counsel in the Firm's San Francisco office where he devotes his practice to representing investors in securities fraud class actions. Grant has been lead or co-lead counsel in numerous securities actions and recovered tens of millions of dollars for shareholders. His cases include: *In re Micron Tech, Inc. Sec. Litig.* ($42 million recovery); *Perera v. Chiron Corp.* ($40 million recovery); *King v. CBT Grp., PLC* ($32 million recovery); and *In re Exodus Commc'ns, Inc. Sec. Litig.* ($5 million recovery).

Education

B.A., Brigham Young University, 1988; J.D., University of Texas at Austin, 1990

Mitchell D. Gravo | Of Counsel

Mitchell Gravo is Of Counsel to the Firm and is a member of the Firm's institutional investor client services group. With more than 30 years of experience as a practicing attorney, he serves as liaison to the Firm's institutional investor clients throughout the United States and Canada, advising them on securities litigation matters.

Gravo's clients include Anchorage Economic Development Corporation, Anchorage Convention and Visitors Bureau, UST Public Affairs, Inc., International Brotherhood of Electrical Workers, Alaska Seafood International, Distilled Spirits Council of America, RIM Architects, Anchorage Police Department Employees Association, Fred Meyer, and the Automobile Manufacturer's Association. Prior to joining the Firm, he served as an intern with the Municipality of Anchorage, and then served as a law clerk to Superior Court Judge J. Justin Ripley.

Education

B.A., Ohio State University; J.D., University of San Diego School of Law

Helen J. Hodges | Of Counsel

Helen Hodges is Of Counsel in the Firm's San Diego office. She specializes in securities fraud litigation. Hodges has been involved in numerous securities class actions, including: *Dynegy*, which settled for $474 million; *Thurber v. Mattel*, which was settled for $122 million; *Nat'l Health Labs*, which was settled for $64 million; and *Knapp v. Gomez*, Civ. No. 87-0067-H(M) (S.D. Cal.), in which a plaintiffs' verdict was returned in a Rule 10b-5 class action. Additionally, beginning in 2001, Hodges focused on the prosecution of *Enron*, where a record $7.2 billion recovery was obtained for investors.

Education

B.S., Oklahoma State University, 1979; J.D., University of Oklahoma, 1983

Honors / Awards

Rated AV by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Super Lawyer, 2007; Oklahoma State University Foundation Board of Trustees, 2013

David J. Hoffa | Of Counsel

David Hoffa is Of Counsel in the Firm's Washington D.C. office. He has served as a liaison to over 110 institutional investors in portfolio monitoring, securities litigation and claims filing matters. His practice focuses on providing a variety of legal and consulting services to U.S. state and municipal employee retirement systems and single and multi-employer U.S. Taft-Hartley benefit funds. In addition to serving as a leader on the Firm's Israel Institutional Investor Outreach Team, Hoffa also serves as a member of the Firm's lead plaintiff advisory team, and advises public and multi-employer pension funds around the country on issues related to fiduciary responsibility, legislative and regulatory updates, and "best practices" in the corporate governance of publicly traded companies.

Early in his legal career, Hoffa worked for a law firm based in Birmingham, Michigan, where he appeared regularly in Michigan state court in litigation pertaining to business, construction and employment related matters. Hoffa has also appeared before the Michigan Court of Appeals on several occasions.

Education

B.A., Michigan State University, 1993; J.D., Michigan State University College of Law, 2000

Andrew W. Hutton | Of Counsel

Drew Hutton is Of Counsel in the Firm's San Diego and New York offices, responsible for simplifying cases of complex financial fraud. Hutton has prosecuted a variety of securities actions, achieving high-profile recoveries and results. Representative cases against corporations and their auditors include *In re AOL Time Warner Sec. Litig.* ($2.5 billion) and *In re Williams Cos. Sec. Litig.* ($311 million). Representative cases against corporations and their executives include *In re Broadcom Sec. Litig.* ($150 million) and *In re Clarent Corp. Sec. Litig.* (class plaintiff's 10b-5 jury verdict against former CEO). Hutton is also active in shareholder derivative litigation, achieving monetary recoveries and governance changes, including *In re Affiliated Computer Servs. Derivative Litig.* ($30 million), *In re KB Home S'holder Derivative Litig.* ($30 million) and *In re KeyCorp Derivative Litig.* (modified CEO stock options and governance). Hutton has also litigated securities cases in bankruptcy court (*In re WorldCom, Inc.* – $15 million for individual claimant) and a complex options case before FINRA (eight-figure settlement for individual investor). Hutton is also experienced in complex, multi-district consumer litigation. Representative nationwide insurance cases include *In re Prudential Sales Practices Litig.* ($4 billion), *In re Metro. Life Ins. Co. Sales Practices Litig.* ($2 billion) and *In re Conseco Life Ins. Co. Cost of Ins. Litig.* ($200 million). Representative nationwide consumer lending cases include a $30 million class settlement of Truth-in-Lending claims against American Express and a $24 million class settlement of RICO and RESPA claims against Community Bank of Northern Virginia (now PNC Bank).

Hutton is the founder of Hutton Law Group, a plaintiffs' litigation practice currently representing retirees, individual investors and businesses, and is also the founder of Hutton Investigative Accounting, a financial forensics and investigation firm. Prior founding Hutton Law and joining Robbins Geller, Hutton was a public company accountant, Certified Public Accountant, and broker of stocks, options and insurance products. Hutton has also served as an expert litigation consultant in both financial and corporate governance capacities. Hutton is often responsible for working with experts retained by the Firm in litigation and has conducted dozens of depositions of financial professionals, including audit partners, CFOs, directors, bankers, actuaries and opposing experts.

Education

B.A., University of California, Santa Barbara, 1983; J.D., Loyola Law School, 1994

Frank J. Janecek, Jr. | Of Counsel

Frank Janecek is Of Counsel in the Firm's San Diego office and practices in the areas of consumer/antitrust, Proposition 65, taxpayer and tobacco litigation. He served as co-lead counsel, as well as court appointed liaison counsel, in *Wholesale Elec. Antitrust Cases I & II*, charging an antitrust conspiracy by wholesale electricity suppliers and traders of electricity in California's newly deregulated wholesale electricity market. In conjunction with the Governor of the State of California, the California State Attorney General, the California Public Utilities Commission, the California Electricity Oversight Board, a number of other state and local governmental entities and agencies, and California's large, investor-owned electric utilities, plaintiffs secured a global settlement for California consumers, businesses and local governments valued at more than $1.1 billion. Janecek also chaired several of the litigation committees in California's tobacco litigation, which resulted in the $25.5 billion recovery for California and its local entities, and also handled a constitutional challenge to the State of California's Smog Impact Fee in *Ramos v. Dep't of Motor Vehicles*, which resulted in more than a million California residents receiving full refunds and interest, totaling $665 million.

Education

B.S., University of California, Davis, 1987; J.D., Loyola Law School, 1991

Honors / Awards

Super Lawyer, 2013-2018

Nancy M. Juda | Of Counsel

Nancy Juda is Of Counsel to the Firm and is based in the Firm's Washington, D.C. office. Her practice focuses on advising Taft-Hartley pension and welfare funds on issues related to corporate fraud in the United States securities markets. Juda's experience as an ERISA attorney provides her with unique insight into the challenges faced by pension fund trustees as they endeavor to protect and preserve their funds' assets.

Prior to joining Robbins Geller, Juda was employed by the United Mine Workers of America Health & Retirement Funds, where she began her practice in the area of employee benefits law. She was also associated with a union-side labor law firm in Washington, D.C., where she represented the trustees of Taft-Hartley pension and welfare funds on qualification, compliance, fiduciary, and transactional issues under ERISA and the Internal Revenue Code.

Using her extensive experience representing employee benefit funds, Juda advises trustees regarding their options for seeking redress for losses due to securities fraud. She currently advises trustees of funds providing benefits for members of unions affiliated with North America's Building Trades of the AFL-CIO. Juda also represents funds in ERISA class actions involving breach of fiduciary claims.

Education

B.A., St. Lawrence University, 1988; J.D., American University, 1992

Francis P. Karam | Of Counsel

Frank Karam is Of Counsel to the Firm and is based in the Firm's Melville office. Karam is a trial lawyer with 30 years of experience. His practice focuses on complex class action litigation involving shareholders' rights and securities fraud. He also represents a number of landowners and royalty owners in litigation against large energy companies. He has tried complex cases involving investment fraud and commercial fraud, both on the plaintiff and defense side, and has argued numerous appeals in state and federal courts. Throughout his career, Karam has tried more than 100 cases to verdict.

Karam has served as a partner at several prominent plaintiffs' securities firms. From 1984 to 1990, Karam was an Assistant District Attorney in the Bronx, New York, where he served as a senior Trial Attorney in the Homicide Bureau. He entered private practice in 1990, concentrating on trial and appellate work in state and federal courts.

Education

A.B., College of the Holy Cross; J.D., Tulane University School of Law

Honors / Awards

"Who's Who" for Securities Lawyers, *Corporate Governance Magazine*, 2015

Ashley M. Kelly | Of Counsel

Ashley Kelly is Of Counsel in the San Diego office, where she represents large institutional and individual investors as a member of the Firm's antitrust and securities fraud practices. Her work is primarily federal and state class actions involving the federal antitrust and securities laws, common law fraud, breach of contract and accounting violations. Kelly's case work has been in the financial services, oil & gas, e-commerce and technology industries. In addition to being an attorney, she is a Certified Public Accountant. Kelly was an important member of the litigation team that obtained a $500 million settlement on behalf of investors in *Luther v. Countrywide Fin. Corp.*, which was the largest residential mortgage-backed securities purchaser class action recovery in history.

Education

B.S., Pennsylvania State University, 2005; J.D., Rutgers University-Camden, 2011

Honors / Awards

Super Lawyer, "Rising Star," 2016, 2018-2019

Matthew J. Langley | Of Counsel

Matthew Langley is Of Counsel in the Firm's Chicago office. He focuses his practice on securities fraud and other complex civil litigation. Prior to joining Robbins Geller, Langley served as an Assistant United States Attorney in the Southern District of Florida. He tried cases before the United States District Court and argued before the Eleventh Circuit Court of Appeals. Langley was a member of the Economic Crimes Division and prosecuted cases involving financial fraud, tax fraud, health care fraud, narcotics trafficking and firearm offenses. Before that, Langley was an associate at K&L Gates LLP in Miami from 2011 to 2014 and at Kirkland and Ellis LLP in New York from 2008 to 2011 where he concentrated in complex commercial litigation.

Education

B.A., University of Connecticut, 1997; J.D., Columbia Law School, 2008

Honors / Awards

Super Lawyer "Rising Star," 2013-2014

Jerry E. Martin | Of Counsel

Jerry Martin is Of Counsel in the Firm's Nashville office. He specializes in representing individuals who wish to blow the whistle to expose fraud and abuse committed by federal contractors, health care providers, tax cheats or those who violate the securities laws. Martin was a member of the litigation team that obtained a $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade.

Prior to joining the Firm, Martin served as the presidentially appointed United States Attorney for the Middle District of Tennessee from May 2010 to April 2013. As U.S. Attorney, he made prosecuting financial, tax and health care fraud a top priority. During his tenure, Martin co-chaired the Attorney General's Advisory Committee's Health Care Fraud Working Group. Martin has been recognized as a national leader in combatting fraud and has addressed numerous groups and associations, such as Taxpayers Against Fraud and the National Association of Attorney Generals, and was a keynote speaker at the American Bar Association's Annual Health Care Fraud Conference.

Education

B.A., Dartmouth College, 1996; J.D., Stanford University, 1999

Honors / Awards

Super Lawyer, 2016-2018

Ruby Menon | Of Counsel

Ruby Menon is Of Counsel to the Firm and serves as a member of the Firm's legal, advisory and business development group. She also serves as the liaison to the Firm's many institutional investor clients in the United States and abroad. For over 12 years, Menon served as Chief Legal Counsel to two large multi-employer retirement plans, developing her expertise in many areas of employee benefits and pension administration, including legislative initiatives and regulatory affairs, investments, tax, fiduciary compliance and plan administration.

Education

B.A., Indiana University, 1985; J.D., Indiana University School of Law, 1988

Eugene Mikolajczyk | Of Counsel

Eugene Mikolajczyk is Of Counsel to the Firm and is based in the Firm's San Diego Office. Mikolajczyk has over 30 years' experience prosecuting shareholder and securities litigation cases as both individual and class actions. Among the cases are *Heckmann v. Ahmanson*, in which the court granted a preliminary injunction to prevent a corporate raider from exacting greenmail from a large domestic media/entertainment company.

Mikolajczyk was a primary litigation counsel in an international coalition of attorneys and human rights groups that won a historic settlement with major U.S. clothing retailers and manufacturers on behalf of a class of over 50,000 predominantly female Chinese garment workers, in an action seeking to hold the Saipan garment industry responsible for creating a system of indentured servitude and forced labor. The coalition obtained an unprecedented agreement for supervision of working conditions in the Saipan factories by an independent NGO, as well as a substantial multi-million dollar compensation award for the workers.

Education

B.S., Elizabethtown College, 1974; J.D., Dickinson School of Law, Penn State University, 1978

Roxana Pierce | Of Counsel

Roxana Pierce is Of Counsel in the Firm's Washington D.C. office. She is an international lawyer whose practice focuses on securities litigation, arbitration, negotiations, contracts, international trade, real estate transactions and project development. She has represented clients in over 75 countries, with extensive experience in the Middle East, Asia, Russia, the former Soviet Union, Germany, Belgium, the Caribbean and India. Pierce's client base includes large institutional investors, international banks, asset managers, foreign governments, multi-national corporations, sovereign wealth funds and high net worth individuals.

Pierce has counseled international clients since 1994. She has spearheaded the contract negotiations for hundreds of projects, including several valued at over $1 billion, and typically conducts her negotiations with the leadership of foreign governments and the leadership of Fortune 500 corporations, foreign and domestic. Pierce presently represents several European legacy banks in litigation concerning the 2008 financial crisis.

Education

B.A., Pepperdine University, 1988; J.D., Thomas Jefferson School of Law, 1994

Honors / Awards

Certificate of Accomplishment, Export-Import Bank of the United States

Svenna Prado | Of Counsel

Svenna Prado is Of Counsel in the Firm's San Diego office, where she focuses on various aspects of international securities and consumer litigation. She was part of the litigation teams that secured settlements against German defendant IKB, as well as Deutsche Bank and Deutsche Bank/West LB for their role in structuring residential mortgage-backed securities and their subsequent collapse. Prior to joining the Firm, Prado was Head of the Legal Department for a leading international staffing agency in Germany where she focused on all aspects of employment litigation and corporate governance. After she moved to the United States, Prado worked with an internationally oriented German law firm as Counsel to corporate clients establishing subsidiaries in the United States and Germany. As a law student, Prado worked directly for several years for one of the appointed Trustees winding up Eastern German operations under receivership in the aftermath of the German reunification. Utilizing her experience in this area of law, Prado later helped many clients secure successful outcomes in U.S. Bankruptcy Court.

Education

J.D., University of Erlangen-Nuremberg, Germany, 1996; Qualification for Judicial Office, Upper Regional Court Nuremberg, Germany, 1998; New York University, "U.S. Law and Methodologies," 2001

Stephanie Schroder | Of Counsel

Stephanie Schroder is Of Counsel in the Firm's San Diego office and focuses her practice on advising institutional investors, including public and multi-employer pension funds, on issues related to corporate fraud in the United States and worldwide financial markets. Schroder has been with the Firm since its formation in 2004, and has over 17 years of securities litigation experience.

Schroder has obtained millions of dollars on behalf of defrauded investors. Prominent cases include: *In re AT&T Corp. Sec. Litig.* ($100 million recovery at trial); *In re FirstEnergy Corp. Sec. Litig.* ($89.5 million recovery); *Rasner v. Sturm* (*FirstWorld Communications*); and *In re Advanced Lighting Sec. Litig.* Schroder also specializes in derivative litigation for breaches of fiduciary duties by corporate officers and directors. Significant litigation includes *In re OM Group S'holder Litig.* and *In re Chiquita S'holder Litig.* Schroder also represented clients that suffered losses from the Madoff fraud in the *Austin Capital* and *Meridian Capital* litigations, which were successfully resolved. In addition, Schroder is a frequent lecturer on securities fraud, shareholder litigation, and options for institutional investors seeking to recover losses caused by securities and accounting fraud.

Education

B.A., University of Kentucky, 1997; J.D., University of Kentucky College of Law, 2000

Christopher P. Seefer | Of Counsel

Christopher Seefer is Of Counsel in the Firm's San Francisco office. He concentrates his practice in securities class action litigation, including cases against Verisign, UTStarcom, VeriFone, Nash Finch, NextCard, Terayon and America West. Seefer served as an Assistant Director and Deputy General Counsel for the Financial Crisis Inquiry Commission, which reported to Congress in January 2011 its conclusions as to the causes of the global financial crisis. Prior to joining the Firm, he was a Fraud Investigator with the Office of Thrift Supervision, Department of the Treasury (1990-1999), and a field examiner with the Office of Thrift Supervision (1986-1990).

Education

B.A., University of California Berkeley, 1984; M.B.A., University of California, Berkeley, 1990; J.D., Golden Gate University School of Law, 1998

Arthur L. Shingler III | Of Counsel

Arthur Shingler is Of Counsel to the Firm and is based in the Firm's San Diego office. Shingler has successfully represented both public and private sector clients in hundreds of complex, multi-party actions with billions of dollars in dispute. Throughout his career, he has obtained outstanding results for those he has represented in cases generally encompassing shareholder derivative and securities litigation, unfair business practices litigation, publicity rights and advertising litigation, ERISA litigation, and other insurance, health care, employment and commercial disputes.

Representative matters in which Shingler served as lead litigation or settlement counsel include, among others: *In re Royal Dutch/Shell ERISA Litig.* ($90 million settlement); *In re Priceline.com Sec. Litig.* ($80 million settlement); *In re General Motors ERISA Litig.* ($37.5 million settlement, in addition to significant revision of retirement plan administration); *Wood v. Ionatron, Inc.* ($6.5 million settlement); *In re Lattice Semiconductor Corp. Derivative Litig.* (corporate governance settlement, including substantial revision of board policies and executive management); *In re 360networks Class Action Sec. Litig.* ($7 million settlement); and *Rothschild v. Tyco Int'l (US), Inc.*, 83 Cal. App. 4th 488 (2000) (shaped scope of California's Unfair Practices Act as related to limits of State's False Claims Act).

Education

B.A., Point Loma Nazarene College, 1989; J.D., Boston University School of Law, 1995

Honors / Awards

B.A., *Cum Laude*, Point Loma Nazarene College, 1989

Leonard B. Simon | Of Counsel

Leonard Simon is Of Counsel in the Firm's San Diego office. His practice has been devoted to litigation in the federal courts, including both the prosecution and the defense of major class actions and other complex litigation in the securities and antitrust fields. Simon has also handled a substantial number of complex appellate matters, arguing cases in the United States Supreme Court, several federal Courts of Appeals, and several California appellate courts. He has also represented large, publicly traded corporations. Simon served as plaintiffs' co-lead counsel *in In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, MDL No. 834 (D. Ariz.) (settled for $240 million), and *In re NASDAQ Market-Makers Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.) (settled for more than $1 billion). He was also in a leadership role in several of the state court antitrust cases against Microsoft, and the state court antitrust cases challenging electric prices in California. He was centrally involved in the prosecution of *In re Washington Pub. Power Supply Sys. Sec. Litig.*, MDL No. 551 (D. Ariz.), the largest securities class action ever litigated.

Simon is an Adjunct Professor of Law at Duke University, the University of San Diego, and the University of Southern California Law Schools. He has lectured extensively on securities, antitrust, and complex litigation in programs sponsored by the American Bar Association Section of Litigation, the Practicing Law Institute, and ALI-ABA, and at the UCLA Law School, the University of San Diego Law School, and the Stanford Business School. He is an Editor of *California Federal Court Practice* and has authored a law review article on the PSLRA.

Education

B.A., Union College, 1970; J.D., Duke University School of Law, 1973

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2016-2019; Super Lawyer, 2008-2016; J.D., Order of the Coif and with Distinction, Duke University School of Law, 1973

Laura S. Stein | Of Counsel

Laura Stein is Of Counsel in the Firm's Philadelphia office. Since 1995, she has practiced in the areas of securities class action litigation, complex litigation and legislative law. Stein has served for over 20 years as Special Counsel to the Institute for Law and Economic Policy (ILEP), a think tank which develops policy positions on selected issues involving the administration of justice within the American legal system. She has also served as Counsel to the Annenberg Institute of Public Service at the University of Pennsylvania.

In a unique partnership with her mother, attorney Sandra Stein, also Of Counsel to the Firm, the Steins have served as the Firm's and the nation's top asset recovery experts. The Steins focus on minimizing losses suffered by shareholders due to corporate fraud and breaches of fiduciary duty. The Steins also seek to deter future violations of federal and state securities laws by reinforcing the standards of good corporate governance. The Steins work with over 500 institutional investors across the nation and abroad, and their clients have served as lead plaintiff in successful cases where billions of dollars were recovered for defrauded investors against such companies as: AOL Time Warner, TYCO, Cardinal Health, AT&T, Hanover Compressor, 1st Bancorp, Enron, Dynegy, Inc., Honeywell International and Bridgestone, to name a few. Many of the cases led by the Steins' clients have accomplished groundbreaking corporate governance achievements, including obtaining shareholder-nominated directors.

Education

B.A., University of Pennsylvania, 1992; J.D., University of Pennsylvania Law School, 1995

Sandra Stein | Of Counsel

Sandra Stein is Of Counsel in the Firm's Philadelphia office. She concentrates her practice in securities class action litigation, legislative law and antitrust litigation. In a unique partnership with her daughter, Laura Stein, also Of Counsel to the Firm, the Steins have served as the Firm's and the nation's top asset recovery experts. The Steins focus on minimizing losses suffered by shareholders due to corporate fraud and breaches of fiduciary duty.

Previously, Stein served as Counsel to United States Senator Arlen Specter of Pennsylvania. During her service in the United States Senate, Stein was a member of Senator Specter's legal staff and a member of the United States Senate Judiciary Committee staff. She is also the Founder of the Institute for Law and Economic Policy (ILEP), a think tank that develops policy positions on selected issues involving the administration of justice within the American legal system. Stein has also produced numerous public service documentaries for which she was nominated for an Emmy and received an ACE award, cable television's highest award for excellence in programming.

Education

B.S., University of Pennsylvania, 1961; J.D., Temple University School of Law, 1966

Honors / Awards

Nominated for an Emmy and received an ACE award for public service documentaries

John J. Stoia, Jr. | Of Counsel

John Stoia is Of Counsel to the Firm and is based in the Firm's San Diego office. He is one of the founding partners and former managing partner of the Firm. He focuses his practice on insurance fraud, consumer fraud and securities fraud class actions. Stoia has been responsible for over $10 billion in recoveries on behalf of victims of insurance fraud due to deceptive sales practices such as "vanishing premiums" and "churning." He has worked on dozens of nationwide complex securities class actions, including *In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, which arose out of the collapse of Lincoln Savings & Loan and Charles Keating's empire. Stoia was a member of the plaintiffs' trial team that obtained verdicts against Keating and his co-defendants in excess of $3 billion and settlements of over $240 million.

He also represented numerous large institutional investors who suffered hundreds of millions of dollars in losses as a result of major financial scandals, including AOL Time Warner and WorldCom. Currently, Stoia is lead counsel in numerous cases against online discount voucher companies for violations of both federal and state laws including violation of state gift card statutes.

Education

B.S., University of Tulsa, 1983; J.D., University of Tulsa, 1986; LL.M., Georgetown University Law Center, 1987

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2019; Super Lawyer, 2007-2017; Litigator of the Month, *The National Law Journal*, July 2000; LL.M. Top of Class, Georgetown University Law Center

David C. Walton | Of Counsel

David Walton was a founding partner of Robbins Geller Rudman & Dowd LLP. For over 20 years, he has prosecuted class actions and private actions on behalf of defrauded investors, particularly in the area of accounting fraud. He has investigated and participated in the litigation of highly complex accounting scandals within some of America's largest corporations, including Enron ($7.2 billion), HealthSouth ($671 million), WorldCom ($657 million), AOL Time Warner ($629 million), Countrywide ($500 million), and Dynegy ($474 million), as well as numerous companies implicated in stock option backdating.

Walton is a member of the Bar of California, a Certified Public Accountant (California 1992), a Certified Fraud Examiner, and is fluent in Spanish. In 2003-2004, he served as a member of the California Board of Accountancy, which is responsible for regulating the accounting profession in California.

Education

B.A., University of Utah, 1988; J.D., University of Southern California Law Center, 1993

Honors / Awards

Super Lawyer, 2015-2016; California Board of Accountancy, Member, 2003-2004; *Southern California Law Review*, Member, University of Southern California Law Center; Hale Moot Court Honors Program, University of Southern California Law Center

Bruce Gamble | Special Counsel

Bruce Gamble is Special Counsel to the Firm in the Firm's Washington D.C. office and is a member of the Firm's institutional investor client services group. He serves as liaison with the Firm's institutional investor clients in the United States and abroad, advising them on securities litigation matters. Gamble formerly served as Of Counsel to the Firm, providing a broad array of highly specialized legal and consulting services to public retirement plans. Prior to working with Robbins Geller, Gamble was General Counsel and Chief Compliance Officer for the District of Columbia Retirement Board, where he served as chief legal advisor to the Board of Trustees and staff. Gamble's experience also includes serving as Chief Executive Officer of two national trade associations and several senior level staff positions on Capitol Hill.

Education

B.S., University of Louisville, 1979; J.D., Georgetown University Law Center, 1989

Honors / Awards

Executive Board Member, National Association of Public Pension Attorneys, 2000-2006; American Banker selection as one of the most promising U.S. bank executives under 40 years of age, 1992

Carlton R. Jones | Special Counsel

Carlton Jones is Special Counsel to the Firm and is a member of the Intellectual Property group in the Atlanta office. Although Jones primarily focuses on patent litigation, he has experience handling a variety of legal matters of a technical nature, including performing invention patentability analysis and licensing work for the Centers for Disease Control as well as litigation involving internet streaming-audio licensing disputes and medical technologies. He is a registered Patent Attorney with the United States Patent and Trademark Office.

Education

B.S., Georgia Institute of Technology, 2006; J.D., Georgia State University College of Law, 2009

Tricia L. McCormick | Special Counsel

Tricia McCormick is Special Counsel to the Firm and focuses primarily on the prosecution of securities class actions. McCormick has litigated numerous cases against public companies in the state and federal courts which resulted in hundreds of millions of dollars in recoveries to investors. She is also a member of a team that is in constant contact with clients who wish to become actively involved in the litigation of securities fraud. In addition, McCormick is active in all phases of the Firm's lead plaintiff motion practice.

Education

B.A., University of Michigan, 1995; J.D., University of San Diego School of Law, 1998

Honors / Awards

J.D., *Cum Laude*, University of San Diego School of Law, 1998

R. Steven Aronica | Forensic Accountant

Steven Aronica is a Certified Public Accountant licensed in the States of New York and Georgia and is a member of the American Institute of Certified Public Accountants, the Institute of Internal Auditors and the Association of Certified Fraud Examiners. Aronica has been instrumental in the prosecution of numerous financial and accounting fraud civil litigation claims against companies that include Lucent Technologies, Tyco, Oxford Health Plans, Computer Associates, Aetna, WorldCom, Vivendi, AOL Time Warner, Ikon, Doral Financial, First BanCorp, Acclaim Entertainment, Pall Corporation, iStar Financial, Hibernia Foods, NBTY, Tommy Hilfiger, Lockheed Martin, the Blackstone Group and Motorola. In addition, he assisted in the prosecution of numerous civil claims against the major United States public accounting firms.

Aronica has been employed in the practice of financial accounting for more than 30 years, including public accounting, where he was responsible for providing clients with a wide range of accounting and auditing services; the investment bank Drexel Burnham Lambert, Inc., where he held positions with accounting and financial reporting responsibilities; and at the SEC, where he held various positions in the divisions of Corporation Finance and Enforcement and participated in the prosecution of both criminal and civil fraud claims.

Education

B.B.A., University of Georgia, 1979

Andrew J. Rudolph | Forensic Accountant

Andrew Rudolph is the Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting expertise in connection with securities fraud litigation against national and foreign companies. He has directed hundreds of financial statement fraud investigations, which were instrumental in recovering billions of dollars for defrauded investors. Prominent cases include *Qwest*, *HealthSouth*, *WorldCom*, *Boeing*, *Honeywell*, *Vivendi*, *Aurora Foods*, *Informix*, *Platinum Software*, *AOL Time Warner*, and *UnitedHealth*.

Rudolph is a Certified Fraud Examiner and a Certified Public Accountant licensed to practice in California. He is an active member of the American Institute of Certified Public Accountants, California's Society of Certified Public Accountants, and the Association of Certified Fraud Examiners. His 20 years of public accounting, consulting and forensic accounting experience includes financial fraud investigation, auditor malpractice, auditing of public and private companies, business litigation consulting, due diligence investigations and taxation.

Education

B.A., Central Connecticut State University, 1985

Christopher Yurcek | Forensic Accountant

Christopher Yurcek is the Assistant Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting and litigation expertise in connection with major securities fraud litigation. He has directed the Firm's forensic accounting efforts on numerous high-profile cases, including *In re Enron Corp. Sec. Litig.* and *Jaffe v. Household Int'l, Inc.*, which obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases include *HealthSouth*, *UnitedHealth*, *Vesta*, *Informix*, *Mattel*, *Coca-Cola* and *Media Vision*.

Yurcek has over 20 years of accounting, auditing, and consulting experience in areas including financial statement audit, forensic accounting and fraud investigation, auditor malpractice, turn-around consulting, business litigation and business valuation. He is a Certified Public Accountant licensed in California, holds a Certified in Financial Forensics (CFF) Credential from the American Institute of Certified Public Accountants, and is a member of the California Society of CPAs and the Association of Certified Fraud Examiners.

Education

B.A., University of California, Santa Barbara, 1985

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
ROBBINS GELLER RUDMAN & DOWD LLP
Reported Expenses/Charges on Behalf of IPPs

EXPENSES/CHARGES

CATEGORY	AMOUNT
Attorney Service	80.00
Court Fees (Filing, etc.)	350.00
Lexis/Westlaw	162.00
Messenger/Delivery	147.05
Photocopies – In House ($0.15 per copy)	52.50
Postage	152.89
Telephone/Telecopier	29.35
Travel	2,125.40
TOTAL:	**$ 3,099.19**

EXHIBIT 55

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF ALEXANDRA S. BERNAY IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF ROBBINS GELLER RUDMAN & DOWD LLP**

I, Alexandra S. Bernay declare:

1. I am a member of Robbins Geller Rudman & Dowd LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel former named class representative David Beson and as counsel for IPPs throughout the course of this litigation. The background and experience of Robbins Geller Rudman & Dowd LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Robbins Geller Rudman & Dowd LLP has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While Robbins Geller Rudman & Dowd LLP devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Robbins Geller Rudman & Dowd LLP performed the following work: drafted the opposition to the motion to dismiss defendant NEC, conducted significant document review and coding of defendants' productions for use in depositions and in various pleadings including amended complaints, participated in weekly conference calls regarding discovery, produced discovery from plaintiff David Beson, including defending the deposition of Mr. Beson and answering interrogatories and discovery requests related to class certification.

5. Attached hereto as **Exhibit B** is a billing summary of Robbins Geller Rudman & Dowd LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Robbins Geller Rudman & Dowd LLP during this period of time was

623.40 with a corresponding lodestar based on current rates of $$254,521.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Robbins Geller Rudman & Dowd LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Robbins Geller Rudman & Dowd LLP has incurred during the course of this litigation. Robbins Geller Rudman & Dowd LLP expended a total of $3,099.19 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Robbins Geller Rudman & Dowd LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Robbins Geller Rudman & Dowd LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at San Diego, California

/s/ Alexandra S. Bernay

Alexandra S. Bernay

ATTESTATION

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

By: */s/ Steven N. Williams*
Steven N. Williams

EXHIBIT A

Robbins Geller Rudman & Dowd LLP

THE RIGHT CHOICE



Global Antitrust and Unfair Competition Practice Resume

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Introduction

Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or the "Firm") is a 200-lawyer firm with offices in Atlanta, Boca Raton, Chicago, Manhattan, Melville, Nashville, San Diego, San Francisco, Philadelphia and Washington, D.C. (www.rgrdlaw.com). The Firm is actively engaged in complex litigation, emphasizing antitrust, securities, consumer, insurance, healthcare, human rights and employment discrimination class actions, as well as intellectual property disputes. The Firm's unparalleled experience and capabilities in these fields are based upon the talents of its attorneys, who have successfully prosecuted thousands of class action lawsuits and numerous individual cases, recovering billions of dollars.

The Firm's record of success includes some of the largest recoveries in history, including (i) the largest securities class action recovery: $7.2 billion (*Enron*); and the largest securities class action recovery following a trial: $1.575 billion (*HSBC Finance Corp.*).

This successful track record stems from our experienced attorneys, including many who came to the Firm from federal or state law enforcement agencies. The Firm also includes several dozen former federal and state judicial clerks. The depth and breadth of the Firm's resources are unequalled. With hundreds of highly skilled attorneys and employees, including forensic accountants, economists, damage analysts, investigators, paralegals, database programmers and computer security experts, Robbins Geller is able to give the highest level of attention and professionalism to each case and client.

The Firm is committed to practicing law with the highest level of integrity in an ethical and professional manner. We are a diverse firm with lawyers and staff from all walks of life. Our lawyers and other employees are hired and promoted based on the quality of their work and their ability to treat others with respect and dignity.

We strive to be good corporate citizens and work with a sense of global responsibility. Contributing to our communities and environment is important to us. We often take cases on a pro bono basis and are committed to the rights of workers, and to the extent possible, we contract with union vendors. We care about civil rights, workers' rights and treatment, workplace safety and environmental protection. Indeed, while we have built a reputation as the finest securities and consumer class action law firm in the nation, our lawyers have also worked tirelessly in less high-profile, but no less important, cases involving human rights and other social issues.

Private antitrust "suits provide a significant supplement to the limited resources available to the Department of Justice for enforcing the antitrust laws and deterring violations."

- *Reiter v. Sonotone Corp.*, 442 U.S. 330, 344 (1979).

Antitrust

Robbins Geller's antitrust attorneys have successfully prosecuted some of the nation's most complicated antitrust actions. Able to draw on exceptional resources and experience, the Firm's cadre of antitrust specialists are willing and able to bring each case to trial. Several of the Firm's antitrust attorneys, including Patrick J. Coughlin and David W. Mitchell, are former Assistant U.S. Attorneys with extensive criminal and civil trial experience, and the Firm's roll of attorneys includes more than 25 former federal and state judicial clerks. Robbins Geller also features a strong appellate department with U.S. Supreme Court experience.

Robbins Geller has been appointed lead counsel in numerous federal antitrust class actions, and has achieved some of the largest recoveries on behalf of antitrust plaintiffs. For example:

- *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass). Co-lead counsel. Settled for $590.5 million.
- *In re Currency Conversion Fee Antitrust Litig.*, 01 MDL No. 1409 (S.D.N.Y.). Co-lead counsel. Settled for $336 million.
- *In re NASDAQ Market-Makers Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.). Co-lead counsel. Settled for $1.027 billion.
- *Thomas & Thomas Rodmakers, Inc. v. Newport Adhesives & Composites, Inc.* (Carbon Fiber Antitrust Litigation), No. CV-99-07796 (C.D. Cal.). Co-lead counsel. Settled for $67.5 million.
- *Hall v. NCAA* (Restricted Earnings Coach Antitrust Litigation), No. 94-2392 (D. Kan.). Lead counsel for one of the three classes of coaches. After successful jury trial, settled for more than $70 million.

Courts have recognized Robbins Geller's attorneys for the results they have achieved. In approving an antitrust class action settlement in which Robbins Geller served as co-lead counsel, the court praised counsel for providing "***extraordinarily high-quality representation***" and for litigating with "***enormous attention to detail and unflagging devotion to the cause***." *In re Currency Conversion Fee Antitrust Litig.*, 263 F.R.D. 110, 129 (S.D.N.Y. 2009). The judge said the attorneys "***represented the Class with a high degree of professionalism, and vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar***." *Id.*

Antitrust Attorneys

Samuel H. Rudman, *Partner*. Sam Rudman is a founding member of the Firm, a member of the Firm's Executive and Management Committees, and manages the Firm's Manhattan and Melville offices.

Rudman is co-lead counsel in several multi-district antitrust class actions pending in federal courts around the country, including *In re Aluminum Warehousing Antitrust Litig.*, No. 13-md-2481 (S.D.N.Y.), and leads the Firm's litigation teams *In re Domestic Airline Travel Antitrust Litig.*, No. 15-mc-01404 (D.D.C.), and *In re Treasury Sec. Auction Litig.*, No. 15-cv-05794 (S.D.N.Y.).

In addition to antitrust litigation, Rudman's practice focuses on recognizing and investigating securities fraud, and initiating securities and shareholder class actions to vindicate shareholder rights and recover shareholder losses. A former attorney with the U.S. Securities and Exchange Commission, Rudman has recovered hundreds of millions of dollars for shareholders, including: $129 million recovery in *In re Doral Fin. Corp. Sec. Litig.*, No. 05 MD 1706 (S.D.N.Y.); $74 million recovery in *In re First BanCorp Sec. Litig.*, No. 05-CV-2148 (D.P.R.); $65 million recovery in *In re Forest Labs., Inc. Sec. Litig.*, No. 05-CV-2827 (S.D.N.Y.); and $50 million recovery in *In re TD Banknorth S'holders Litig.*, No. 2557-VCL (Del. Ch.).

In the *TD Banknorth* litigation, the court appointed Rudman and the Firm to be lead counsel for the plaintiff class only after rejecting as "wholly inadequate" the settlement negotiated for the class by another law firm. When the Firm later achieved a $50 million recovery for the class, the court stated: "This is one of the cases – there's probably been a half a dozen since I've been a judge that I handled which have – really through the sheer diligence and effort of plaintiffs' counsel – resulted in substantial awards for plaintiffs, after overcoming serious procedural and other barriers. . . . [I]t appears plainly from the papers that you and your co-counsel have diligently, and at great personal expense and through the devotion of many thousands of hours of your time, prosecuted this case to a successful conclusion." The court also credited the Firm with raising the inadequacy of the initial settlement.

David W. Mitchell, *Partner*. David Mitchell is a former Assistant U.S. Attorney in the Southern District of California. While at the U.S. Attorney's Office, Mitchell worked on cases involving narcotics trafficking, bank robbery, murder-for-hire, alien smuggling, and terrorism. He tried nearly 20 cases to verdict before federal criminal juries and made numerous appellate arguments before the Ninth Circuit Court of Appeals.

Mitchell's practice focuses on antitrust and securities fraud litigation. He leads the Firm's antitrust benchmark rate litigations as well as the Firm's pay-for-delay actions. He has served as lead or co-lead counsel in numerous cases and has helped achieve substantial settlements for shareholders. His recent cases include *Dahl v. Bain Capital Partners, LLC*, obtaining more than $590 million for shareholders, and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* Currently, Mitchell serves as court-appointed counsel in the ISDAfix Benchmark action, *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, No. 1:14-cv-07126 (S.D.N.Y.), and *In re Aluminum Warehousing Antitrust Litig.*, No. 13 MD 2481 (S.D.N.Y.).

Mitchell is a member of the prestigious Enright Inn of Court and was nationally recognized for his legal work and named an "Antitrust Trailblazer" by *The National Law Journal*, which honored attorneys for their achievements in various specialties. Mitchell was also named to the "Best of the Bar – The Most Outstanding Lawyers in San Diego" list by the *San Diego Business Journal*, the Super Lawyers list, and the 2014 Global Directory of Who's Who.

Patrick J. Coughlin, *Of Counsel*. Patrick Coughlin has been lead counsel for several major antitrust and securities matters, including one of the earliest and largest class action securities cases to go to trial, *In re Apple Comput. Sec. Litig.*, No. C-84-20148 (N.D. Cal.). Coughlin also served as co-lead counsel in *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, 05 MDL No. 1720 (E.D.N.Y.), and is

plaintiffs' trial counsel in the ISDAfix Benchmark antitrust litigation *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, No. 1:14-cv-07126 (S.D.N.Y.).

Coughlin was recently one of the lead attorneys who secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members will be eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Additional prominent complex class actions prosecuted by Coughlin include the *Enron* litigation, in which $7.2 billion was recovered; the *Qwest* litigation, in which a $445 million recovery was obtained; and the *HealthSouth* litigation, in which a $671 million recovery was obtained.

Formerly, Coughlin was an Assistant U.S. Attorney in the District of Columbia and the Southern District of California, handling complex white-collar fraud matters. During this time, Coughlin helped try one of the largest criminal RICO cases ever prosecuted by the United States, *United States v. Brown*, No. 86-3056-SWR (D.D.C.), as well as an infamous oil fraud scheme resulting in a complex murder-for-hire trial, *United States v. Boeckman*, No. 87-cr-00676 (S.D. Cal.).

Coughlin's additional trials involving securities violations include cases against Wells Fargo and California Amplifier. Both cases settled in trial. Cases that settled on the eve of trial include cases against Alcatel and America West. Coughlin has tried more than 50 jury and non-jury trials, including a large private RICO trial against the major tobacco companies on behalf of hundreds of thousands of Ohio Taft-Hartley health and welfare fund participants. Coughlin also helped end the Joe Camel ad campaign, a cartoon ad campaign that targeted children, and secured a $12.5 billion recovery for the cities and counties of California in the landmark 1998 state settlement with the tobacco companies.

In 2015, *The National Law Journal* recognized Coughlin as an "Antitrust Trailblazer."

Brian O. O'Mara, *Partner*. Brian O'Mara's practice focuses on complex securities and antitrust litigation. Since 2003, O'Mara has served as lead or co-lead counsel in numerous shareholder and antitrust actions, including: *Bennett v. Sprint Nextel Corp.* (D. Kan.) ($131 million recovery); *In re CIT Grp. Inc. Sec. Litig.* (S.D.N.Y.) ($75 million recovery); *In re MGM Mirage Sec. Litig.* (D. Nev.) ($75 million recovery); *C.D.T.S. No. 1 v. UBS AG* (S.D.N.Y.); *In re Aluminum Warehousing Antitrust Litig.* (S.D.N.Y.); and *Alaska Electrical Pension Fund v. Bank of America Corp.* (S.D.N.Y.).

O'Mara has been responsible for a number of significant rulings, including: *Alaska Elec. Pension Fund v. Bank of Am. Corp.*, 175 F. Supp. 3d 44 (S.D.N.Y. 2016); *Bennett v. Sprint Nextel Corp.*, 298 F.R.D. 498 (D. Kan. 2014); *In re MGM Mirage Sec. Litig.*, 2013 U.S. Dist. LEXIS 139356 (D. Nev. 2013*); In re Constar Int'l, Inc. Sec. Litig.*, 2008 U.S. Dist. LEXIS 16966 (E.D. Pa. 2008), *aff'd*, 585 F.3d 774 (3d Cir. 2009); *In re Direct Gen. Corp. Sec. Litig.*, 2006 U.S. Dist. LEXIS 56128 (M.D. Tenn. 2006); and *In re Dura Pharm., Inc. Sec. Litig.*, 452 F. Supp. 2d 1005 (S.D. Cal. 2006).

O'Mara is the co-author of *Whether Alleging "Motive and Opportunity" Can Satisfy the Heightened Pleading Standards of the Private Securities Litigation Reform Act of 1995: Much Ado About Nothing*, 1 DePaul Bus. & Com. L.J. 313 (2003).

Prior to joining the Firm, O'Mara served as law clerk to the Honorable Jerome M. Polaha of the Second Judicial District Court of the State of Nevada. He earned a Bachelor of Arts degree from the University of Kansas and a Juris Doctor degree from DePaul University College of Law, where he was the recipient of a CALI Excellence Award in Securities Regulation.

Mark J. Dearman, *Partner*. Mark Dearman is a partner in the Firm's Boca Raton office. Dearman's practice focuses on consumer fraud, securities fraud, mass torts, antitrust, whistleblower and corporate takeover litigation. Some of Dearman's recent representative cases include: *In re NHL Players' Concussion Injury Litig.*, 2015 U.S. Dist. LEXIS 38755 (D. Minn. 2015); *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, 903 F. Supp. 2d 942 (S.D. Cal. 2012); *In re Volkswagen "Clean Diesel" Mktg. Sales Practice, & Prods. Liab. Litig.*, 2016 U.S. Dist. LEXIS 1357 (N.D. Cal. 2016); *In re Ford Fusion & C-Max Fuel Econ. Litig.*, 2015 U.S. Dist. LEXIS 155383 (S.D.N.Y. 2015*); Looper v. FCA US LLC*, No. 5:14-cv-00700 (C.D. Cal.); *In re Aluminum Warehousing Antitrust Litig.*, 95 F. Supp. 3d 419 (S.D.N.Y. 2015), *aff'd*, 833 F.3d 151 (2d Cir. 2016); *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J.); *In re Winn-Dixie Stores, Inc. S'holder Litig.*, No. 16-2011-CA-010616 (Fla. 4th Jud. Cir. Ct., Duval Cty.); *Gemelas v. Dannon Co. Inc.*, No. 1:08-cv-00236 (N.D. Ohio); and *In re AuthenTec, Inc. S'holder Litig.*, No. 05-2012-CA-57589 (Fla. 18th Jud. Cir. Ct., Brevard Cty.).

Dearman is AV rated by Martindale-Hubbell, and has been recognized as a Florida Super Lawyer in *Super Lawyers Magazine*. He has also been recognized by his peers as being in the top 1.5% of Florida Civil Trial Lawyers as published in *Florida Trend*'s Florida Legal Elite.

Prior to joining the Firm, Dearman spent several years defending Fortune 500 companies in all aspects of litigation, with an emphasis in complex commercial litigation, consumer claims, and mass torts (products liability and personal injury). Dearman went on to found the firm of Dearman & Gerson where he continued to defend many publicly traded corporations for over 12 years. Within the last 17 years of practice, Dearman has obtained extensive jury trial experience on the plaintiffs' side, protecting the rights of investors throughout the United States.

Dearman received a Bachelor of Arts degree from the University of Florida. He earned his Juris Doctor degree from Nova Southeastern University. Upon graduation from law school, he worked in the Miami office of Ruden, McClosky, Smith, Schuster & Russell.

Alexandra S. Bernay, *Partner*. Xan Bernay is a partner in the Firm's San Diego office, where she specializes in antitrust and unfair competition class-action litigation. She has also worked on some of the Firm's largest securities fraud class actions, including the *Enron* litigation, which recovered an unprecedented $7.3 billion for investors.

Bernay's current practice focuses on the prosecution of antitrust and consumer fraud cases. She was on the litigation team that prosecuted *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* She is also a member of the litigation team involved in *In re Digital Music Antitrust Litig.*, as well as a member of the Co-Lead Counsel team in *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London*, pending in federal court in New Jersey, where she represents buyers of insurance in an action against insurance companies in the London market. She is also involved in a number of other cases in the Firm's antitrust practice area.

Bernay was actively involved in the consumer action on behalf of bank customers who were overcharged for debit card transactions. That case, *In re Checking Account Overdraft Litig.*, resulted in more than $500 million in settlements with major banks that manipulated customers' debit transactions to maximize overdraft fees. She was also part of the trial team in an antitrust monopolization case against a multinational computer and software company.

Susan G. Taylor, *Partner*. Susan Goss Taylor is a former Special Assistant U.S. Attorney for the Southern District of California, where she obtained considerable trial experience prosecuting drug smuggling and alien smuggling cases.

Taylor served as counsel on the *Microsoft*, *DRAM* and *Dahl* antitrust litigation teams, as well as on a number of consumer actions alleging false and misleading advertising and unfair business practices against major corporations such as General Motors, Saturn, Mercedes-Benz USA, LLC, BMG Direct Marketing, Inc., and Ameriquest Mortgage Company. As a partner with Robbins Geller, Taylor has also been responsible for prosecuting securities fraud class actions and has obtained recoveries for investors in litigation involving WorldCom, Qwest and AOL Time Warner.

Steven M. Jodlowski, *Partner*. Steven Jodlowski is a partner in the Firm's San Diego office. Jodlowski has been actively involved in a variety of cases involving consumer fraud, antitrust, employment, and complex insurance class action litigation. Jodlowski has participated in a series of nationwide actions brought against life insurance carriers for fraudulent and deceptive conduct in connection with the marketing and sale of deferred annuities to senior citizens. In two of these matters, federal district courts certified nationwide Racketeer Influenced and Corrupt Organizations Act litigation classes comprised of tens of thousands of deferred annuity policyholders, and California subclasses predicated on the same factual allegations. Jodlowski's efforts have resulted in recoveries of nearly $600 million in benefits for policyholders, including *Negrete v. Allianz Life Ins. Co. of N. Am.* (estimated settlement value of $250 million), *In re Nat'l W. Life Ins. Deferred Annuities Litig.* (estimated settlement value of $21.02 million), *In re Midland Nat'l Life Ins. Co. Annuity Sales Practices Litig.* (estimated settlement value of $79.538 million), *Negrete v. Fidelity & Guar. Life Ins. Co.* (estimated settlement value of $52.7 million), and *In re Am. Equity Annuity Practices & Sales Litig.* (estimated settlement value of $129 million). In *Liberty Mutual Overtime Cases*, Jodlowski represented and ultimately helped secure $65 million for a class of current and former insurance claims adjusters in California.

Jodlowski also represents institutional and individual shareholders in corporate takeover actions and breach of fiduciary litigation in state and federal court. He has handled pre- and post-merger litigation stemming from the acquisition of publicly listed companies in the biotechnology, oil and gas, information technology, specialty retail, electrical, banking, finance and real estate industries, among others. Additionally, Jodlowski served on the trial team in an antitrust monopolization case against a multinational computer and software company and represents individuals and businesses in other antitrust litigation.

Jodlowski received a Bachelor of Management degree in Information Systems from the University of Central Oklahoma. He earned a Juris Doctor degree, *cum laude*, from California Western School of Law. While in law school Jodlowski was a clerk at the Firm and joined Robbins Geller after graduating.

Carmen A. Medici, *Partner*. Carmen Medici is a partner in the Firm's San Diego office. He represents businesses and consumers who are the victims of price-fixing, monopolization, collusion, and other anticompetitive and unfair business practices. Medici is currently part of the co-lead counsel team prosecuting *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig*. He is also part of the co-lead counsel team in *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London*, where Medici represents buyers of insurance in an antitrust action against insurance companies in the London market. He is also a member of the co-lead litigation team in *In re Aluminum Warehousing Antitrust Litig*. Medici was a member of the discovery team in *In re NCAA Student-Athlete Name & Likeness Licensing Litig.*, which culminated in a trial victory for student athletes against the NCAA. He is also on the litigation teams in *In re Fresh & Process Potatoes Antitrust Litig.* and *In re Digital Music Antitrust Litig*. In addition, he is involved in a number of the Firm's other major antitrust and consumer actions. Medici regularly identifies and pursues potential new antitrust matters and drafts complaints on behalf of individual and class plaintiffs.

Medici graduated from Arizona State University in 2003 with a degree in Business Management. In 2006, he received his J.D. from the University of San Diego School of Law. He is licensed to practice law in both Arizona and California.

Lonnie A. Browne, *Associate*. Lonnie Browne is an associate in the Firm's San Diego office, where his practice focuses on complex antitrust and securities litigation. Among others, Browne is a member of the teams prosecuting *In re Aluminum Warehousing Litig.*, No. 1:13-md-02481 (S.D.N.Y.), *Alaska Elec. Pension Fund v. Bank of America*, No. 14-cv-07126 (S.D.N.Y.), and *In re Text Messaging Antitrust Litig.*, No. 08-cv-07082 (N.D. Ill.).

Browne earned his Bachelor of Arts in History from Stanford University in 2008. After teaching and coaching at Damien High School in La Verne, California, Browne attended the University of San Diego School of Law, receiving his Juris Doctor in 2013. During law school, Browne served as comments editor on the *San Diego International Law Journal* and as a teaching assistant for Professor Alastair J. Agcaoili. Browne also earned a Community Service Grant from the School of Law to work with San Diego's Employee Rights Center and advocate for members of the United Domestic Workers of America. In addition, he worked at the Law Offices of Robert Vaage and served as a judicial extern for the Honorable William McCurine, Jr. of the United States District Court for the Southern District of California.

Vincent M. Serra, *Associate*. Vincent Serra is an associate at the Firm's Melville office and focuses his practice on complex antitrust, consumer, employment and securities litigation. His efforts have contributed to the recovery of billions of dollars on behalf of aggrieved plaintiffs and class members. Serra has contributed to several significant antitrust recoveries, including *In re Currency Conversion Fee Antitrust Litig.* ($336 million recovery) and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*

Serra was also a member of the team of attorneys who recently secured a $590.5 million settlement on behalf of investors in *Dahl v. Bain Capital Partners, LLC*, an antitrust action against some of the world's largest and most powerful private equity firms in the world alleging collusive practices in multi-billion dollar leveraged buyouts. He is currently litigating with others on the ISDAfix Benchmark case and *In re Treasuries Sec. Auction Antitrust Litig.*, and represents consumers in several actions against manufacturers and retailers for the improper marketing, sale and/or warranting of their products. Additionally, Serra was part of the litigation team that obtained a $22.75 million settlement fund on behalf of route drivers in an action asserting violations of federal and state overtime laws against Cintas Corp. He was also part of the successful trial team in *Lebrilla v. Farmers Grp., Inc.*, which involved Farmers' practice of using inferior imitation parts when repairing insureds' vehicles. Other notable cases include *Alaska Elec. Pension Fund v. Pharmacia Corp.* ($164 million recovery) and *In re Priceline.com Sec. Litig.* ($80 million recovery).

Serra earned his Bachelor of Arts degree in International Relations with a minor in History from the University of Delaware and his Juris Doctor degree from California Western School of Law, where he received the Wiley W. Manuel award for pro bono legal services. He interned and clerked at the Firm during law school.

Notable Antitrust Achievements and Recoveries

Robbins Geller's antitrust practice focuses on representing businesses and individuals who have been the victims of price-fixing, unlawful monopolization, market allocation, tying and other anti-competitive conduct. The Firm has taken a leading role in many of the largest federal and state price-fixing, monopolization, market allocation and tying cases throughout the United States.

- ***Dahl v. Bain Capital Partners, LLC***, No. 07-cv-12388-EFH (D. Mass). Robbins Geller attorneys served as co-lead counsel on behalf of shareholders in this action against the nation's largest private equity firms who colluded to restrain competition to suppress prices paid to shareholders of public companies in connection with leveraged buyouts. After nearly seven years of hard-fought litigation, in March 2015, the court approved several settlements totaling $590.5 million. The aggregate settlement is the largest antitrust class action settlement involving market allocation in which no government antitrust action was taken.

- ***Alaska Elec. Pension Fund v. Bank of America Corporation***, No. 14-cv-07126-JMF (S.D.N.Y.). Robbins Geller attorneys are prosecuting antitrust claims against 13 major banks and broker ICAP plc who are alleged to have conspired to manipulate the ISDAfix rate, the key interest rate for a broad range of interest rate derivatives and other financial instruments. The class action is brought on behalf of investors and market participants who entered into an interest rate derivative transaction during an eight-year period from 2006 to 2014.

- ***In re Currency Conversion Fee Antitrust Litig.***, 01 MDL No. 1409 (S.D.N.Y.). Robbins Geller attorneys recovered $336 million for credit and debit cardholders in this multi-district litigation in which the Firm served as co-lead counsel. The court praised the Firm as "indefatigable" and noted that the Firm's lawyers "represented the Class with a high degree of professionalism, and vigorously litigated every issue against some of the ablest lawyers in the antitrust defense bar."

- ***In re Aftermarket Automotive Lighting Products Antitrust Litig.***, 09 MDL No. 2007 (C.D. Cal.). Robbins Geller attorneys are co-lead counsel in this multi-district litigation in which plaintiffs allege that defendants conspired to fix prices and allocate markets for automotive lighting products. The last defendants settled just before the scheduled trial, resulting in total settlements of more than $50 million. Commenting on the quality of representation, the court commended the Firm for "expend[ing] substantial and skilled time and efforts in an efficient manner to bring this action to conclusion."

- ***In re Dig. Music Antitrust Litig.***, 06 MDL No. 1780 (S.D.N.Y.). Robbins Geller attorneys are co-lead counsel in an action against the major music labels (Sony-BMG, EMI, Universal and Warner Music Group) in a case involving music that can be downloaded digitally from the Internet. Plaintiffs allege that defendants restrained the development of digital downloads and agreed to fix the distribution price of digital downloads at supracompetitive prices. Plaintiffs also allege that as a result of defendants' restraint of the development of digital downloads, and the market and price for downloads, defendants were able to maintain the prices of their CDs at supracompetitive levels. The Second Circuit Court of Appeals upheld plaintiffs' complaint, reversing the trial court's dismissal. Discovery is ongoing.

- ***In re NASDAQ Market-Makers Antitrust Litig.***, MDL No. 1023 (S.D.N.Y.). Robbins Geller attorneys served as co-lead counsel in this case in which investors alleged that NASDAQ market-makers set and maintained artificially wide spreads pursuant to an industry-wide conspiracy. After years of intense litigation, the case settled for a total of $1.027 billion, at the time the largest ever antitrust settlement.

- ***In re Dynamic Random Access Memory (DRAM) Antitrust Litig.***, 02 MDL No. 1486 (N.D. Cal.). Robbins Geller attorneys served on the executive committee in this multi-district class action in which a class of purchasers of dynamic random access memory (or DRAM) chips alleged that the leading manufacturers of semiconductor products fixed the price of DRAM chips from the fall of 2001 through at least the end of June 2002. The case settled for more than $300 million.

- ***Microsoft I-V Cases***, JCCP No. 4106 (Cal. Super. Ct., San Francisco Cty.). Robbins Geller attorneys served on the executive committee in these consolidated cases in which California indirect

purchasers challenged Microsoft's illegal exercise of monopoly power in the operating system, word processing and spreadsheet markets. In a settlement approved by the court, class counsel obtained an unprecedented $1.1 billion worth of relief for the business and consumer class members who purchased the Microsoft products.

Additional Practice Areas and Services

Securities Fraud

As recent corporate scandals demonstrate clearly, it has become all too common for companies and their executives – often with the help of their advisors, such as bankers, lawyers and accountants – to manipulate the market price of their securities by misleading the public about the company's financial condition or prospects for the future. This misleading information has the effect of artificially inflating the price of the company's securities above their true value. When the underlying truth is eventually revealed, the prices of these securities plummet, harming those innocent investors who relied upon the company's misrepresentations.

Robbins Geller is the leader in the fight to protect investors from corporate securities fraud. We utilize a wide range of federal and state laws to provide investors with remedies, either by bringing a class action on behalf of all affected investors or, where appropriate, by bringing individual cases.

The Firm's reputation for excellence has been repeatedly noted by courts and has resulted in the appointment of Firm attorneys to lead roles in hundreds of complex class-action securities and other cases. In the securities area alone, the Firm's attorneys have been responsible for a number of outstanding recoveries on behalf of investors. Currently, Robbins Geller attorneys are lead or named counsel in hundreds of securities class action or large institutional-investor cases. Some notable current and past cases include:

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest aggregate class action settlement not only in a securities class action, but in class action history***.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill.). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in the Seventh Circuit and the seventh-largest settlement ever in a post-PSLRA securities fraud case.*** According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. The Firm obtained an $895 million recovery on behalf of the UnitedHealth shareholders, and former CEO William A. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders, bringing the total recovery for the class to over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a

shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a $500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). On behalf of investors in bonds and preferred securities issued between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company and Wachovia auditor KPMG LLP. ***The total settlement – $627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 20 largest securities class action recoveries in history***. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis. The lawsuit focused on Wachovia's exposure to "pick-a-pay" loans, which the bank's offering materials said were of "pristine credit quality," but which were actually allegedly made to subprime borrowers, and which ultimately massively impaired the bank's mortgage portfolio. Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors on behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund. At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit.

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***In re HealthSouth Corp. Sec. Litig.***, No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder

plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer Inc. common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc. and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation.

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders –

the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved represents between 34% and 70% of the aggregate class wide damages, far exceeding the typical recovery in a securities class action.

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, the largest IPO in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million.

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement.

- ***Nieman v. Duke Energy Corp.,*** No. 3:12-cv-00456 (W.D.N.C.). Robbins Geller, along with co-counsel, obtained a $146.25 million settlement on behalf of Duke Energy Corporation investors. The settlement resolves accusations that defendants misled investors regarding Duke's future leadership following its merger with Progress Energy, Inc., and specifically, their premeditated coup to oust William D. Johnson (CEO of Progress) and replace him with Duke's then-CEO, John Rogers. This historic settlement represents the largest recovery ever in a North Carolina securities fraud action, and one of the five largest recoveries in the Fourth Circuit.

- ***Bennett v. Sprint Nextel Corp.***, No. 2:09-cv-02122 (D. Kan.). As co-lead counsel, Robbins Geller obtained a $131 million recovery for a class of Sprint investors. The settlement, secured after five years of hard-fought litigation, resolved claims that former Sprint executives misled investors concerning the success of Sprint's ill-advised merger with Nextel and the deteriorating credit quality of Sprint's customer base, artificially inflating the value of Sprint's securities.

- ***Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.***, No. 3:09-cv-00882 (M.D. Tenn.). In the *Psychiatric Solutions* case, Robbins Geller represented lead plaintiff and class representative Central States, Southeast and Southwest Areas Pension Fund in litigation spanning more than four years. Psychiatric Solutions and its top executives were accused of insufficiently staffing their in-patient hospitals, downplaying the significance of regulatory investigations and manipulating their malpractice reserves. Just days before trial was set to commence, attorneys from Robbins Geller achieved a $65 million settlement that was the third-largest securities recovery ever in the district and the largest in a decade.

- ***Plumbers & Pipefitters National Pension Fund v. Burns***, No. 3:05-cv-07393-JGC (N.D. Ohio). After 11 years of hard-fought litigation, Robbins Geller attorneys secured a $64 million recovery for shareholders in a case that accused the former heads of Dana Corp. of securities fraud for trumpeting the auto parts maker's condition while it actually spiraled toward bankruptcy. The Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

- ***In re St. Jude Med., Inc. Sec. Litig.***, No. 0:10-cv-00851 (D. Minn.). After four and one half years of litigation and mere weeks before the jury selection, Robbins Geller obtained a $50 million settlement on behalf of investors in medical device company St. Jude Medical. The settlement resolves accusations

that St. Jude Medical misled investors by utilizing heavily discounted end-of-quarter bulk sales to meet quarterly expectations, which created a false picture of demand by increasing customer inventory due of St. Jude Medical devices. The complaint alleged that the risk of St. Jude Medical's reliance on such bulk sales manifested when it failed to meet its forecast guidance for the third quarter of 2009, which the company had reaffirmed only weeks earlier.

Robbins Geller's securities practice is also strengthened by the existence of a strong appellate department, whose collective work has established numerous legal precedents. The securities practice also utilizes an extensive group of in-house economic and damage analysts, investigators and forensic accountants to aid in the prosecution of complex securities issues.

Shareholder Derivative and Corporate Governance Litigation

The Firm's shareholder derivative and corporate governance practice is focused on preserving corporate assets and enhancing long-term shareowner value. Shareowner derivative actions are often brought by institutional investors to vindicate the rights of the corporation injured by its executives' misconduct, which can effect violations of the nation's securities, anti-corruption, false claims, cyber-security, labor, environmental and/or health & safety laws.

Robbins Geller attorneys have aided Firm clients in significantly enhancing shareowner value by obtaining hundreds of millions of dollars in financial clawbacks and successfully negotiating corporate governance enhancements. Robbins Geller has worked with its institutional clients to address corporate misconduct such as options backdating, bribery of foreign officials, pollution, off-label marketing, and insider trading and related self-dealing. Additionally, the Firm works closely with noted corporate governance consultants Robert Monks, Richard Bennett and their firm, ValueEdge Advisors LLC, to shape corporate governance practices that will benefit shareowners.

Robbins Geller's efforts have conferred substantial benefits upon shareowners, and the market effect of these benefits measures in the billions of dollars. The Firm's significant achievements include:

- ***City of Westland Police and Fire Retirement System v. Stumpf (Wells Fargo Derivative Litigation)***, No. 3:11-cv-02369 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Wells Fargo & Co. alleging that Wells Fargo's executives allowed participation in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, *i.e.*, the execution and submission of false legal documents in courts across the country without verification of their truth or accuracy, and failed to disclose Wells Fargo's lack of cooperation in a federal investigation into the bank's mortgage and foreclosure practices. In settlement of the action, Wells Fargo agreed to provide $67 million in homeowner down-payment assistance, credit counseling and improvements to its mortgage servicing system. The initiatives will be concentrated in cities severely impacted by the bank's foreclosure practices and the ensuing mortgage foreclosure crisis. Additionally, Wells Fargo agreed to change its procedures for reviewing shareholder proposals and a strict ban on stock pledges by Wells Fargo board members.

- ***In re Ormat Techs., Inc. Derivative Litig.***, No. CV10-00759 (Nev. Dist. Ct., Washoe Cty.). Robbins Geller brought derivative claims for breach of fiduciary duty and unjust enrichment against the directors and certain officers of Ormat Technologies, Inc., a leading geothermal and recovered energy power business. During the relevant time period, these Ormat insiders caused the company to engage in accounting manipulations that ultimately required restatement of the company's financial statements. The settlement in this action includes numerous corporate governance reforms designed to, among other things: (i) increase director independence; (ii) provide continuing education to directors; (iii)

enhance the company's internal controls; (iv) make the company's board more independent; and (iv) strengthen the company's internal audit function.

- ***In re Alphatec Holdings, Inc. Derivative S'holder Litig.***, No. 37-2010-00058586 (Cal. Super. Ct., San Diego Cty.). Obtained sweeping changes to Alphatec's governance, including separation of the Chairman and CEO positions, enhanced conflict of interest procedures to address related-party transactions, rigorous director independence standards requiring that at least a majority of directors be outside independent directors, and ongoing director education and training.

- ***In re Finisar Corp. Derivative Litig.***, No. C-06-07660 (N.D. Cal.). Prosecuted shareholder derivative action on behalf of Finisar against certain of its current and former directors and officers for engaging in an alleged nearly decade-long stock option backdating scheme that was alleged to have inflicted substantial damage upon Finisar. After obtaining a reversal of the district court's order dismissing the complaint for failing to adequately allege that a pre-suit demand was futile, Robbins Geller lawyers successfully prosecuted the derivative claims to resolution obtaining over $15 million in financial clawbacks for Finisar. Robbins Geller attorneys also obtained significant changes to Finisar's stock option granting procedures and corporate governance. As a part of the settlement, Finisar agreed to ban the repricing of stock options without first obtaining specific shareholder approval, prohibit the retrospective selection of grant dates for stock options and similar awards, limit the number of other boards on which Finisar directors may serve, require directors to own a minimum amount of Finisar shares, annually elect a Lead Independent Director whenever the position of Chairman and CEO are held by the same person, and require the board to appoint a Trading Compliance officer responsible for ensuring compliance with Finisar's insider trading policies.

- ***Loizides v. Schramm (Maxwell Technology Derivative Litigation)***, No. 37-2010-00097953 (Cal. Super. Ct., San Diego Cty.). Prosecuted shareholder derivative claims arising from the company's alleged violations of the Foreign Corrupt Practices Act of 1977 ("FCPA"). As a result of Robbins Geller's efforts, Maxwell insiders agreed to adopt significant changes in Maxwell's internal controls and systems designed to protect Maxwell against future potential violations of the FCPA. These corporate governance changes included, establishing the following, among other things: a compliance plan to improve board oversight of Maxwell's compliance processes and internal controls; a clear corporate policy prohibiting bribery and subcontracting kickbacks, whereby individuals are accountable; mandatory employee training requirements, including the comprehensive explanation of whistleblower provisions, to provide for confidential reporting of FCPA violations or other corruption; enhanced resources and internal control and compliance procedures for the audit committee to act quickly if an FCPA violation or other corruption is detected; an FCPA and Anti-Corruption Compliance department that has the authority and resources required to assess global operations and detect violations of the FCPA and other instances of corruption; a rigorous ethics and compliance program applicable to all directors, officers and employees, designed to prevent and detect violations of the FCPA and other applicable anti-corruption laws; an executive-level position of Chief Compliance Officer with direct board-level reporting responsibilities, who shall be responsible for overseeing and managing compliance issues within the company; a rigorous insider trading policy buttressed by enhanced review and supervision mechanisms and a requirement that all trades are timely disclosed; and enhanced provisions requiring that business entities are only acquired after thorough FCPA and anti-corruption due diligence by legal, accounting and compliance personnel at Maxwell.

- ***In re SciClone Pharm., Inc. S'holder Derivative Litig.***, No. CIV 499030 (Cal. Super. Ct., San Mateo Cty.). Robbins Geller attorneys successfully prosecuted the derivative claims on behalf of nominal party SciClone Pharmaceuticals, Inc., resulting in the adoption of state-of-the-art corporate governance reforms. The corporate governance reforms included the establishment of an FCPA compliance coordinator; the adoption of an FCPA compliance program and code; and the adoption of additional internal controls and compliance functions.

- ***Policemen & Firemen Ret. Sys. of the City of Detroit v. Cornelison (Halliburton Derivative Litigation)***, No. 2009-29987 (Tex. Dist. Ct., Harris Cty.). Prosecuted shareholder derivative claims on behalf of Halliburton Company against certain Halliburton insiders for breaches of fiduciary duty arising from Halliburton's alleged violations of the FCPA. In the settlement, Halliburton agreed, among other things, to adopt strict intensive controls and systems designed to detect and deter the payment of bribes and other improper payments to foreign officials, to enhanced executive compensation clawback, director stock ownership requirements, a limitation on the number of other boards that Halliburton directors may serve, a lead director charter, enhanced director independence standards, and the creation of a management compliance committee.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, our client, CalPERS, obtained sweeping corporate governance improvements, including the election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercises, as well as executive compensation reforms that tie pay to performance. In addition, the class obtained $925 million, the largest stock option backdating recovery ever and four times the next largest options backdating recovery.

- ***In re Fossil, Inc. Derivative Litig.***, No. 3:06-cv-01672 (N.D. Tex.). The settlement agreement included the following corporate governance changes: declassification of elected board members; retirement of three directors and addition of five new independent directors; two-thirds board independence requirements; corporate governance guidelines providing for "Majority Voting" election of directors; lead independent director requirements; revised accounting measurement dates of options; addition of standing finance committee; compensation clawbacks; director compensation standards; revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; enhanced education and training; and audit engagement partner rotation and outside audit firm review.

- ***Pirelli Armstrong Tire Corp. Retiree Med. Benefits Tr. v. Sinegal (Costco Derivative Litigation),*** No. 2:08-cv-01450 (W.D. Wash.). The parties agreed to settlement terms providing for the following corporate governance changes: the amendment of Costco's bylaws to provide "Majority Voting" election of directors; the elimination of overlapping compensation and audit committee membership on common subject matters; enhanced Dodd-Frank requirements; enhanced internal audit standards and controls, and revised information-sharing procedures; revised compensation policies and procedures; revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; and enhanced ethics compliance standards and training.

- ***In re F5 Networks, Inc. Derivative Litig.***, No. C-06-0794 (W.D. Wash.). The parties agreed to the following corporate governance changes as part of the settlement: revised stock option plans and grant procedures; limited stock option granting authority, timing and pricing; "Majority Voting" election of directors; lead independent director requirements; director independence standards; elimination of director perquisites; and revised compensation practices.

Options Backdating Litigation

As has been widely reported in the media, the stock options backdating scandal suddenly engulfed hundreds of publicly traded companies throughout the country in 2006. Robbins Geller was at the forefront of investigating and prosecuting options backdating derivative and securities cases. The Firm has recovered over $1 billion in damages on behalf of injured companies and shareholders.

- ***In re KLA-Tencor Corp. S'holder Derivative Litig.***, No. C-06-03445 (N.D. Cal.). After successfully opposing the special litigation committee of the board of directors' motion to terminate the derivative claims, Robbins Geller recovered $43.6 million in direct financial benefits for KLATencor, including $33.2 million in cash payments by certain former executives and their directors' and officers' insurance carriers.

- ***In re Marvell Technology Grp. Ltd. Derivative Litig.***, No. C-06-03894 (N.D. Cal.). Robbins Geller recovered $54.9 million in financial benefits, including $14.6 million in cash, for Marvell, in addition to extensive corporate governance reforms related to Marvell's stock option granting practices, board of directors' procedures and executive compensation.

- ***In re KB Home S'holder Derivative Litig.***, No. 06-CV-05148 (C.D. Cal.). Robbins Geller served as co-lead counsel for the plaintiffs and recovered more than $31 million in financial benefits, including $21.5 million in cash, for KB Home, plus substantial corporate governance enhancements relating to KB Home's stock option granting practices, director elections and executive compensation practices.

Corporate Takeover Litigation

Robbins Geller has earned a reputation as the leading law firm in representing shareholders in corporate takeover litigation. Through its aggressive efforts in prosecuting corporate takeovers, the Firm has secured for shareholders billions of dollars of additional consideration as well as beneficial changes for shareholders in the context of mergers and acquisitions.

The Firm regularly prosecutes merger and acquisition cases post-merger, often through trial, to maximize the benefit for its shareholder class. Some of these cases include:

- ***In re Kinder Morgan, Inc. S'holders Litig.***, No. 06-C-801 (Kan. Dist. Ct., Shawnee Cty.). In the largest recovery ever for corporate takeover class action litigation, the Firm negotiated a settlement fund of $200 million in 2010.

- ***In re Dole Food Co., Inc. Stockholder Litig.***, No. 8703-VCL (Del. Ch.). Robbins Geller and co-counsel went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders. The litigation challenged the 2013 buyout of Dole by its billionaire Chief Executive Officer and Chairman, David H. Murdock. On August 27, 2015, the court issued a post-trial ruling that Murdock and fellow director C. Michael Carter – who also served as Dole's General Counsel, Chief Operating Officer and Murdock's top lieutenant – had engaged in fraud and other misconduct in connection with the buyout and are liable to Dole's former stockholders for over $148 million, the largest trial verdict ever in a class action challenging a merger transaction.

- ***In re Rural Metro Corp. Stockholders Litig.***, No. 6350-VCL (Del. Ch.). Robbins Geller and co-counsel were appointed lead counsel in this case after successfully objecting to an inadequate settlement that did not take into account evidence of defendants' conflicts of interest. In a post-trial opinion, Delaware Vice Chancellor J. Travis Laster found defendant RBC Capital Markets, LLC liable for aiding and abetting Rural/Metro's board of directors' fiduciary duty breaches in the $438 million buyout of Rural/Metro, citing "the magnitude of the conflict between RBC's claims and the evidence." RBC was ordered to pay nearly $110 million as a result of its wrongdoing, the largest damage award ever obtained against a bank over its role as a merger adviser. The Delaware Supreme Court issued a landmark opinion affirming the judgment on November 30, 2015, *RBC Capital Mkts., LLC v. Jervis*, 129 A.3d 816 (Del. 2015).

- ***In re Del Monte Foods Co. S'holders Litig.***, No. 6027-VCL (Del. Ch.). Robbins Geller exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. For efforts in achieving these results, the Robbins Geller lawyers prosecuting the case were named Attorneys of the Year by *California Lawyer* magazine in 2012.

- ***In re TD Banknorth S'holders Litig.***, No. 2557-VCL (Del. Ch.). After objecting to a modest recovery of just a few cents per share, the Firm took over the litigation and obtained a common fund settlement of $50 million.

- ***In re Chaparral Res., Inc. S'holders Litig.***, No. 2633-VCL (Del. Ch.). After a full trial and a subsequent mediation before the Delaware Chancellor, the Firm obtained a common fund settlement of $41 million (or 45% increase above merger price) for both class and appraisal claims.

- ***Laborers' Local #231 Pension Fund v. Websense, Inc.***, No. 37-2013-00050879-CU-BT-CTL (Cal. Super. Ct., San Diego Cty.). Robbins Geller successfully obtained a record-breaking $40 million in *Websense, Inc.*, which is believed to be the largest post-merger common fund settlement in California state court history. The class action challenged the May 2013 buyout of Websense by Vista Equity Partners (and affiliates) for $24.75 per share and alleged breach of fiduciary duty against the former Websense Board of Directors, and aiding and abetting against Websense's financial advisor, Merrill Lynch, Pierce, Fenner & Smith, Inc. Claims were pursued by the plaintiff in both California state court and the Delaware Court of Chancery.

- ***In re Onyx Pharm., Inc. S'holder Litig.***, No. CIV523789 (Cal. Super. Ct., San Mateo Cty.). Robbins Geller obtained $30 million in a case against the former Onyx Board of Directors for breaching its fiduciary duties in connection with the acquisition of Onyx by Amgen Inc. for $125 per share at the expense of shareholders. At the time of the settlement, it was believed to set the record for the largest post-merger common fund settlement in California state court history. Over the case's three years, Robbins Geller defeated defendants' motions to dismiss, obtained class certification, took over 20 depositions and reviewed over one million pages of documents. Further, the settlement was reached just days before a hearing on the defendants' motion for summary judgment was set to take place, and the result is now believed to be the second largest post-merger common fund settlement in California state court history.

- ***Harrah's Entertainment***, No. A529183 (Nev. Dist. Ct., Clark Cty.). The Firm's active prosecution of the case on several fronts, both in federal and state court, assisted Harrah's shareholders in securing an additional $1.65 billion in merger consideration.

- ***In re Chiron S'holder Deal Litig.***, No. RG 05-230567 (Cal. Super. Ct., Alameda Cty.). The Firm's efforts helped to obtain an additional $800 million in increased merger consideration for Chiron shareholders.

- ***In re Dollar Gen. Corp. S'holder Litig.***, No. 07MD-1 (Tenn. Cir. Ct., Davidson Cty.). As lead counsel, the Firm secured a recovery of up to $57 million in cash for former Dollar General shareholders on the eve of trial.

- ***In re Prime Hospitality, Inc. S'holders Litig.***, No. 652-N (Del. Ch.). The Firm objected to a settlement that was unfair to the class and proceeded to litigate breach of fiduciary duty issues involving a sale of hotels to a private equity firm. The litigation yielded a common fund of $25 million for shareholders.

- ***In re UnitedGlobalCom, Inc. S'holder Litig.***, No. 1012-VCS (Del. Ch.). The Firm secured a common fund settlement of $25 million just weeks before trial.

- ***In re eMachines, Inc. Merger Litig.***, No. 01-CC-00156 (Cal. Super. Ct., Orange Cty.). After four years of litigation, the Firm secured a common fund settlement of $24 million on the brink of trial.

- ***In re PeopleSoft, Inc. S'holder Litig.***, No. RG-03100291 (Cal. Super. Ct., Alameda Cty.). The Firm successfully objected to a proposed compromise of class claims arising from takeover defenses by PeopleSoft, Inc. to thwart an acquisition by Oracle Corp., resulting in shareholders receiving an increase of over $900 million in merger consideration.

- ***ACS S'holder Litig.***, No. CC-09-07377-C (Tex. Cty. Ct., Dallas Cty.). The Firm forced ACS's acquirer, Xerox, to make significant concessions by which shareholders would not be locked out of receiving more money from another buyer.

Insurance

Fraud and collusion in the insurance industry by executives, agents, brokers, lenders and others is one of the most costly crimes in the United States. Some experts have estimated the annual cost of white collar crime in the insurance industry to be over $120 billion nationally. Recent legislative proposals seek to curtail anti-competitive behavior within the industry. However, in the absence of comprehensive regulation, Robbins Geller has played a critical role as private attorney general in protecting the rights of consumers against insurance fraud and other unfair business practices within the insurance industry.

Robbins Geller attorneys have long been at the forefront of litigating race discrimination issues within the life insurance industry. For example, the Firm has fought the practice by certain insurers of charging African-Americans and other people of color more for life insurance than similarly situated Caucasians. The Firm recovered over $400 million for African-Americans and other minorities as redress for civil rights abuses, including landmark recoveries in *McNeil v. American General Life & Accident Insurance Company*; *Thompson v. Metropolitan Life Insurance Company*; and *Williams v. United Insurance Company of America*.

The Firm's attorneys fight on behalf of elderly victims targeted for the sale of deferred annuity products with hidden sales loads and illusory bonus features. Sales agents for life insurance companies such as Allianz Life Insurance Company of North America, Midland National Life Insurance Company, and National Western Life Insurance Company targeted senior citizens for these annuities with lengthy investment horizons and high sales commissions. The Firm recovered millions of dollars for elderly victims and seeks to ensure that senior citizens are afforded full and accurate information regarding deferred annuities.

Robbins Geller attorneys also stopped the fraudulent sale of life insurance policies based on misrepresentations about how the life insurance policy would perform, the costs of the policy, and whether premiums would "vanish." Purchasers were also misled about the financing of a new life insurance policy, falling victim to a "replacement" or "churning" sales scheme where they were convinced to use loans, partial surrenders or withdrawals of cash values from an existing permanent life insurance policy to purchase a new policy.

- **Brokerage "Pay to Play" Cases**. On behalf of individuals, governmental entities, businesses, and non-profits, Robbins Geller has sued the largest commercial and employee benefit insurance brokers and insurers for unfair and deceptive business practices. While purporting to provide independent, unbiased advice as to the best policy, the brokers failed to adequately disclose that they had entered into separate "pay to play" agreements with certain third-party insurance companies. These agreements provide additional compensation to the brokers based on such factors as profitability, growth and the

volume of insurance that they place with a particular insurer, and are akin to a profit-sharing arrangement between the brokers and the insurance companies. These agreements create a conflict of interest since the brokers have a direct financial interest in selling their customers only the insurance products offered by those insurance companies with which the brokers have such agreements.

Robbins Geller attorneys were among the first to uncover and pursue the allegations of these practices in the insurance industry in both state and federal courts. On behalf of the California Insurance Commissioner, the Firm brought an injunctive case against the biggest employee benefit insurers and local San Diego brokerage, ULR, which resulted in major changes to the way they did business. The Firm also sued on behalf of the City and County of San Francisco to recover losses due to these practices. Finally, Robbins Geller represents a putative nationwide class of individuals, businesses, employers, and governmental entities against the largest brokerage houses and insurers in the nation. To date, the Firm has obtained over $200 million on behalf of policyholders and enacted landmark business reforms.

- **Discriminatory Credit Scoring and Redlining Cases**. Robbins Geller attorneys have prosecuted cases concerning countrywide schemes of alleged discrimination carried out by Nationwide, Allstate, and other insurance companies against African-American and other persons of color who are purchasers of homeowner and automobile insurance policies. Such discrimination includes alleged redlining and the improper use of "credit scores," which disparately impact minority communities. Plaintiffs in these actions have alleged that the insurance companies' corporate-driven scheme of intentional racial discrimination includes refusing coverage and/or charging them higher premiums for homeowners and automobile insurance. On behalf of the class of aggrieved policyholders, the Firm has recovered over $400 million for these predatory and racist policies.

- **Senior Annuities**. Robbins Geller has prosecuted numerous cases against insurance companies and their agents who targeted senior citizens for the sale of deferred annuities. Plaintiffs alleged that the insurers misrepresented or failed to disclose to senior consumers material facts concerning the costs associated with their fixed and equity indexed deferred annuities and enticed seniors to buy the annuities by promising them illusory up-front bonuses. As a result of the Firm's efforts, hundreds of millions of dollars in economic relief has been made available to seniors who have been harmed by these practices. Notable recoveries include:

    - ***Negrete v. Allianz Life Ins. Co. of N. Am.***, No. CV-05-6838 (C.D. Cal.). Robbins Geller attorneys served as co-lead counsel on behalf of a nationwide RICO class consisting of over 200,000 senior citizens who had purchased deferred annuities issued by Allianz Life Insurance Company of North America. In March 2015, after nine years of litigation, District Judge Christina A. Snyder granted final approval of a class action settlement that made available in excess of $250 million in cash payments and other benefits to class members. In approving the settlement, the Court praised the effort of the Firm and noted that "counsel has represented their clients with great skill and they are to be complimented."

    - ***In re Am. Equity Annuity Practices & Sales Litig.***, No. CV-05-6735 (C.D. Cal.). As co-lead counsel, Robbins Geller attorneys secured a settlement that made available $129 million in economic benefits to a nationwide class of 114,000 senior citizens.

    - ***In re Midland Nat'l Life Ins. Co. Annuity Sales Practices Litig.***, MDL No. 07-1825 (C.D. Cal.). After four years of litigation, the Firm secured a settlement that made available $79.5 million in economic benefits to a nationwide class of 70,000 senior citizens.

- ***Negrete v. Fidelity & Guar. Life Ins. Co.***, No. CV-05-6837 (C.D. Cal.). The Firm's efforts resulted in a settlement under which Fidelity made available $52.7 in benefits to 56,000 class members across the country.

- ***In re Nat'l Western Life Ins. Deferred Annuities Litig.***, No. 05-CV-1018 (S.D. Cal.). The Firm litigated this action for more than eight years. On the eve of trial, the Firm negotiated a settlement providing over $21 million in value to a nationwide class of 12,000 senior citizens.

Consumer Fraud

In our consumer-based economy, working families who purchase products and services must receive truthful information so they can make meaningful choices about how to spend their hard-earned money. When financial institutions and other corporations deceive consumers or take advantage of unequal bargaining power, class action suits provide, in many instances, the only realistic means for an individual to right a corporate wrong.

Robbins Geller attorneys represent consumers around the country in a variety of important, complex class actions. Our attorneys have taken a leading role in many of the largest federal and state consumer fraud, environmental, human rights and public health cases throughout the United States. The Firm is also actively involved in many cases relating to banks and the financial services industry, pursuing claims on behalf of individuals victimized by abusive telemarketing practices, abusive mortgage lending practices, market timing violations in the sale of variable annuities, and deceptive consumer credit lending practices in violation of the Truth-In-Lending Act. Below are a few representative samples of our robust, nationwide consumer practice.

- ***Trump University***. After six and half years of tireless litigation and on the eve of trial, Robbins Geller, serving as co-lead counsel, secured a historic recovery on behalf of Trump University students around the country. The settlement provides $25 million to approximately 7,000 consumers, including senior citizens who accessed retirement accounts and maxed out credit cards to enroll in Trump University. The extraordinary result means individual class members will be eligible for upwards of $35,000 in restitution. The settlement resolves claims that President Donald J. Trump and Trump University violated federal and state laws by misleadingly marketing "Live Events" seminars and mentorships as teaching Trump's "real-estate techniques" through his "hand-picked" "professors" at his so-called "university." Robbins Geller represented the class on a *pro bono* basis.

- ***Bank Overdraft Fees Litigation***. The banking industry charges consumers exorbitant amounts for "overdraft" of their checking accounts, even if the customer did not authorize a charge beyond the available balance and even if the account would not have been overdrawn had the transactions been ordered chronologically as they occurred – that is, banks reorder transactions to maximize such fees. The Firm brought lawsuits against major banks to stop this practice and recover these false fees. These cases have recovered over $500 million thus far from a dozen banks and we continue to investigate other banks engaging in this practice.

- ***Chase Bank Home Equity Line of Credit Litigation***. In October 2008, after receiving $25 billion in TARP funding to encourage lending institutions to provide businesses and consumers with access to credit, Chase Bank began unilaterally suspending its customers' home equity lines of credit. Plaintiffs charged that Chase Bank did so using an unreliable computer model that did not reliably estimate the actual value of its customers' homes, in breach of the borrowers' contracts. The Firm brought a lawsuit to secure damages on behalf of borrowers whose credit lines were improperly suspended. In early 2013, the court approved a settlement that restored billions of dollars of credit to tens of thousands of borrowers, while requiring Chase to make cash payments to former customers. The total value of this settlement is projected to be between $3 and $4 billion.

- ***Visa and MasterCard Fees***. After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer-protection verdicts ever awarded in the United States. The Firm's attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***West Telemarketing Case***. Robbins Geller attorneys secured a $39 million settlement for class members caught up in a telemarketing scheme where consumers were charged for an unwanted membership program after purchasing Tae-Bo exercise videos. Under the settlement, consumers were entitled to claim between one and one-half to three times the amount of all fees they unknowingly paid.

- ***Dannon Activia***®. Robbins Geller attorneys secured the largest ever settlement for a false advertising case involving a food product. The case alleged that Dannon's advertising for its Activia® and DanActive® branded products and their benefits from "probiotic" bacteria were overstated. As part of the nationwide settlement, Dannon agreed to modify its advertising and establish a fund of up to $45 million to compensate consumers for their purchases of Activia® and DanActive®.

- ***Mattel Lead Paint Toys***. In 2006-2007, toy manufacturing giant Mattel and its subsidiary Fisher-Price announced the recall of over 14 million toys made in China due to hazardous lead and dangerous magnets. Robbins Geller attorneys filed lawsuits on behalf of millions of parents and other consumers who purchased or received toys for children that were marketed as safe but were later recalled because they were dangerous. The Firm's attorneys reached a landmark settlement for millions of dollars in refunds and lead testing reimbursements, as well as important testing requirements to ensure that Mattel's toys are safe for consumers in the future.

- ***Tenet Healthcare Cases***. Robbins Geller attorneys were co-lead counsel in a class action alleging a fraudulent scheme of corporate misconduct, resulting in the overcharging of uninsured patients by the Tenet chain of hospitals. The Firm's attorneys represented uninsured patients of Tenet hospitals nationwide who were overcharged by Tenet's admittedly "aggressive pricing strategy," which resulted in price gouging of the uninsured. The case was settled with Tenet changing its practices and making refunds to patients.

- ***Pet Food Products Liability Litigation***. Robbins Geller served as co-lead counsel in this massive, 100+ case products liability MDL in the District of New Jersey concerning the death of and injury to thousands of the nation's cats and dogs due to tainted pet food. The case settled for $24 million.

- ***Sony Gaming Networks & Customer Data Security Breach Litigation***. The Firm served as a member of the Plaintiffs' Steering Committee, helping to obtain a precedential opinion denying in part Sony's motion to dismiss plaintiffs' claims involving the breach of Sony's gaming network, leading to a pending $15 million settlement.

- ***Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation***. As a member of the Plaintiffs' Steering Committee, Robbins Geller partner Paul Geller reached a $14.7 billion settlement (which includes $2.7 billion for environmental remediation), plus a $1.6 billion settlement with dealers, for a total of over $17 billion for consumers affected by the illegal "defeat device" that Volkswagen installed on many of its diesel-engine vehicles. The device tricked regulators into believing the cars were complying with emissions standards, while the cars were actually emitting between 10 and 40 times the allowable limit for harmful pollutants.

Intellectual Property

Individual inventors, universities, and research organizations provide the fundamental research behind many existing and emerging technologies. Every year, the majority of U.S. patents are issued to this group of inventors. Through this fundamental research, these inventors provide a significant competitive advantage to this country. Unfortunately, while responsible for most of the inventions that issue into U.S. patents every year, individual inventors, universities and research organizations receive very little of the licensing revenues for U.S. patents. Large companies reap 99% of all patent licensing revenues.

Robbins Geller enforces the rights of these inventors by filing and litigating patent infringement cases against infringing entities. Our attorneys have decades of patent litigation experience in a variety of technical applications. This experience, combined with the Firm's extensive resources, gives individual inventors the ability to enforce their patent rights against even the largest infringing companies.

Our attorneys have experience handling cases involving a broad range of technologies, including:

- biochemistry
- telecommunications
- medical devices
- medical diagnostics
- networking systems
- computer hardware devices and software
- mechanical devices
- video gaming technologies
- audio and video recording devices

Human Rights, Labor Practices and Public Policy

Robbins Geller attorneys have a long tradition of representing the victims of unfair labor practices and violations of human rights. These include:

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts at bringing about the precedent-setting settlement of the actions.

- ***Liberty Mutual Overtime Cases***, No. JCCP 4234 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller attorneys served as co-lead counsel on behalf of 1,600 current and former insurance claims adjusters at Liberty Mutual Insurance Company and several of its subsidiaries. Plaintiffs brought the case to recover unpaid overtime compensation and associated penalties, alleging that Liberty Mutual

had misclassified its claims adjusters as exempt from overtime under California law. After 13 years of complex and exhaustive litigation, Robbins Geller secured a settlement in which Liberty Mutual agreed to pay $65 million into a fund to compensate the class of claims adjusters for unpaid overtime. The Liberty Mutual action is one of a few claims adjuster overtime actions brought in California or elsewhere to result in a successful outcome for plaintiffs since 2004.

- ***Veliz v. Cintas Corp.***, No. 5:03-cv-01180 (N.D. Cal.). Brought against one of the nation's largest commercial laundries for violations of the Fair Labor Standards Act for misclassifying truck drivers as salesmen to avoid payment of overtime.

- ***Kasky v. Nike, Inc.***, 27 Cal. 4th 939 (2002). The California Supreme Court upheld claims that an apparel manufacturer misled the public regarding its exploitative labor practices, thereby violating California statutes prohibiting unfair competition and false advertising. The Court rejected defense contentions that any misconduct was protected by the First Amendment, finding the heightened constitutional protection afforded to noncommercial speech inappropriate in such a circumstance.

Shareholder derivative litigation brought by Robbins Geller attorneys at times also involves stopping anti-union activities, including:

- ***Southern Pacific/Overnite***. A shareholder action stemming from several hundred million dollars in loss of value in the company due to systematic violations by Overnite of U.S. labor laws.

- ***Massey Energy***. A shareholder action against an anti-union employer for flagrant violations of environmental laws resulting in multi-million-dollar penalties.

- ***Crown Petroleum***. A shareholder action against a Texas-based oil company for self-dealing and breach of fiduciary duty while also involved in a union lockout.

Environment and Public Health

Robbins Geller attorneys have also represented plaintiffs in class actions related to environmental law. The Firm's attorneys represented, on a *pro bono* basis, the Sierra Club and the National Economic Development and Law Center as *amici curiae* in a federal suit designed to uphold the federal and state use of project labor agreements ("PLAs"). The suit represented a legal challenge to President Bush's Executive Order 13202, which prohibits the use of project labor agreements on construction projects receiving federal funds. Our *amici* brief in the matter outlined and stressed the significant environmental and socio-economic benefits associated with the use of PLAs on large-scale construction projects.

Attorneys with Robbins Geller have been involved in several other significant environmental cases, including:

- ***Public Citizen v. U.S. D.O.T.*** Robbins Geller attorneys represented a coalition of labor, environmental, industry and public health organizations including Public Citizen, The International Brotherhood of Teamsters, California AFL-CIO and California Trucking Industry in a challenge to a decision by the Bush administration to lift a Congressionally-imposed "moratorium" on cross-border trucking from Mexico on the basis that such trucks do not conform to emission controls under the Clean Air Act, and further, that the administration did not first complete a comprehensive environmental impact analysis as required by the National Environmental Policy Act. The suit was dismissed by the United States Supreme Court, the Court holding that because the D.O.T. lacked discretion to prevent crossborder trucking, an environmental assessment was not required.

- ***Sierra Club v. AK Steel***. Brought on behalf of the Sierra Club for massive emissions of air and water pollution by a steel mill, including homes of workers living in the adjacent communities, in violation of the Federal Clean Air Act, Resource Conservation Recovery Act and the Clean Water Act.

- ***MTBE Litigation***. Brought on behalf of various water districts for befouling public drinking water with MTBE, a gasoline additive linked to cancer.

- ***Exxon Valdez***. Brought on behalf of fisherman and Alaska residents for billions of dollars in damages resulting from the greatest oil spill in U.S. history.

- ***Avila Beach***. A citizens' suit against UNOCAL for leakage from the oil company pipeline so severe it literally destroyed the town of Avila Beach, California.

Federal laws such as the Clean Water Act, the Clean Air Act, and the Resource Conservation and Recovery Act and state laws such as California's Proposition 65 exist to protect the environment and the public from abuses by corporate and government organizations. Companies can be found liable for negligence, trespass or intentional environmental damage, be forced to pay for reparations and to come into compliance with existing laws. Prominent cases litigated by Robbins Geller attorneys include representing more than 4,000 individuals suing for personal injury and property damage related to the Stringfellow Dump Site in Southern California, participation in the Exxon Valdez oil spill litigation, and litigation involving the toxic spill arising from a Southern Pacific train derailment near Dunsmuir, California.

Robbins Geller attorneys have led the fight against Big Tobacco since 1991. As an example, Robbins Geller attorneys filed the case that helped get rid of Joe Camel, representing various public and private plaintiffs, including the State of Arkansas, the general public in California, the cities of San Francisco, Los Angeles and Birmingham, 14 counties in California, and the working men and women of this country in the Union Pension and Welfare Fund cases that have been filed in 40 states. In 1992, Robbins Geller attorneys filed the first case in the country that alleged a conspiracy by the Big Tobacco companies.

Pro Bono

Robbins Geller provides counsel to those unable to afford legal representation as part of a continuous and longstanding commitment to the communities in which it serves. Over the years the Firm has dedicated a considerable amount of time, energy, and a full range of its resources for many pro bono and charitable actions.

Robbins Geller has been honored for its pro bono efforts by the California State Bar (including a nomination for the President's Pro Bono Law Firm of the Year award) and the San Diego Volunteer Lawyer's Program, among others.

Some of the Firm's and its attorneys' pro bono and charitable actions include:

- Representing Trump University students in two class actions against President Donald J. Trump. The historic settlement provides $25 million to approximately 7,000 consumers. This means individual class members will be eligible for upwards of $35,000 in restitution – an extraordinary result.

- Representing children diagnosed with Autism Spectrum Disorder, as well as children with significant disabilities, in New York to remedy flawed educational policies and practices that cause substantial harm to these and other similar children year after year.

- Representing 19 San Diego County children diagnosed with Autism Spectrum Disorder in their appeal of the San Diego Regional Center's termination of funding for a crucial therapy. The victory resulted in a complete reinstatement of funding and set a precedent that allows other children to obtain the treatments they need.

- Serving as Northern California and Hawaii District Coordinator for the United States Court of Appeals for the Ninth Circuit's Pro Bono program since 1993.

- Representing the Sierra Club and the National Economic Development and Law Center as *amici curiae* before the U.S. Supreme Court.

- Obtaining political asylum, after an initial application had been denied, for an impoverished Somali family whose ethnic minority faced systematic persecution and genocidal violence in Somalia, as well as forced female mutilation.

- Working with the ACLU in a class action filed on behalf of welfare applicants subject to San Diego County's "Project 100%" program. Relief was had when the County admitted that food-stamp eligibility could not hinge upon the Project 100% "home visits," and again when the district court ruled that unconsented "collateral contacts" violated state regulations. The decision was noted by the *Harvard Law Review*, *The New York Times* and *The Colbert Report*.

- Filing numerous *amicus curiae* briefs on behalf of religious organizations and clergy that support civil rights, oppose government-backed religious-viewpoint discrimination, and uphold the American traditions of religious freedom and church-state separation.

- Serving as *amicus* counsel in a Ninth Circuit appeal from a Board of Immigration Appeals deportation decision. In addition to obtaining a reversal of the BIA's deportation order, the Firm consulted with the Federal Defenders' Office on cases presenting similar fact patterns, which resulted in a precedent-setting *en banc* decision from the Ninth Circuit resolving a question of state and federal law that had been contested and conflicted for decades.

E-Discovery

Robbins Geller has successfully litigated some of the largest and most complex shareholder and antitrust actions in history and has become the vanguard of a rapidly evolving world of e-discovery in complex litigation. The Firm has 200 attorneys supported by a large staff of forensic and e-discovery specialists and has a level of technological sophistication that is unmatched by any other firm. As the size and stakes of complex litigation continue to increase, it is more important than ever to retain counsel with a successful track record of results. Robbins Geller has consistently proven to be the right choice for anyone seeking representation in actions against the largest corporations in the world.

Led by 20-year litigation veteran Tor Gronborg, and advised by Lea Bays, e-discovery counsel, and Christine Milliron, Director of E-Discovery and Litigation Support, the Robbins Geller e-discovery practice group is a multi-disciplinary team of attorneys, forensic analysts and database professionals. No plaintiffs' firm is better equipped to develop the type of comprehensive and case specific e-discovery strategy that is necessary for today's complex litigation. The attorneys have extensive knowledge and experience in drafting and negotiating sophisticated e-discovery protocols, including those involving the use of predictive coding. High quality document review services are performed by a consistent group of staff attorneys who are experienced in the Firm's litigation practice areas and specialize in document review and analysis. A team of forensic and technology professionals work closely with the attorneys to ensure an effective and efficient e-discovery

strategy. The litigation support team includes six Relativity Certified Administrators. Collectively, the Robbins Geller forensic and technology professionals have more than 75 years of e-discovery experience.

Members of the practice group are also leaders in shaping the broader dialogue on e-discovery issues. They regularly contribute to industry publications, speak at conferences organized by leading e-discovery think tanks such as The Sedona Conference and Georgetown University Law Center's Advanced eDiscovery Institute, and play prominent roles in the local chapters of Women in eDiscovery and the Relativity Users Steering Committee. The e-discovery practice group also offers regular in-house training and education, ensuring that members of the Firm are always up-to-date on the evolving world of e-discovery law and technology.

Robbins Geller has always been a leader in document-intensive litigation. Boasting high-performing infrastructure resources, state-of-the-art technology, and a deep bench of some of the most highly trained Relativity Certified Administrators and network engineers, the Firm's capabilities rival, if not outshine, those of the top e-discovery vendors in the industry. Additionally, the Firm's implementation of advanced analytic technologies and custom workflows makes its work fast, smart and efficient. Combined with Robbins Geller's decision to manage and host its litigation support in-house, these technologies reduce the Firm's reliance on third-party vendors, enabling it to offer top-notch e-discovery services to clients at a fair and reasonable cost.

Security is a top priority at Robbins Geller. The Firm's hosted e-discovery is secured using bank-level 128 encryption and is protected behind state-of-the-art Cisco firewalls. All e-discovery data is hosted on Firm-owned equipment at an SSAE 16-compliant, SOC 1, 2, and 3 audited facility that features 9.1 megawatts of power, N+1 or better redundancy on all data center systems, and security protocols required by leading businesses in the most stringent verticals. Originally designed to support a large defense contractor, it is built to rigorous standards, complete with redundant power and cooling systems plus multiple generators.

Prominent Cases and Judicial Commendations

Prominent Cases

Robbins Geller attorneys obtained outstanding results in some of the most notorious and well-known cases, frequently earning judicial commendations for the quality of their representation.

- ***In re Enron Corp. Sec. Litig.***, No. H-01-3624 (S.D. Tex.). Investors lost billions of dollars as a result of the massive fraud at Enron. In appointing Robbins Geller lawyers as sole lead counsel to represent the interests of Enron investors, the court found that the Firm's zealous prosecution and level of "insight" set it apart from its peers. Robbins Geller attorneys and lead plaintiff The Regents of the University of California aggressively pursued numerous defendants, including many of Wall Street's biggest banks, and successfully obtained settlements in excess of ***$7.2 billion*** for the benefit of investors. ***This is the largest aggregate class action settlement not only in a securities class action, but in class action history***.

  The court overseeing this action had utmost praise for Robbins Geller's efforts and stated that "[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country." *In re Enron Corp. Sec., Derivative & "ERISA" Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008).

  The court further commented: "[I]n the face of extraordinary obstacles, the skills, expertise, commitment, and tenacity of [Robbins Geller] in this litigation cannot be overstated. Not to be overlooked are the unparalleled results, . . . which demonstrate counsel's clearly superlative litigating and negotiating skills." *Id.* at 789.

  The court stated that the Firm's attorneys "are to be commended for their zealousness, their diligence, their perseverance, their creativity, the enormous breadth and depth of their investigations and analysis, and their expertise in all areas of securities law on behalf of the proposed class." *Id.*

  In addition, the court noted, "This Court considers [Robbins Geller] 'a lion' at the securities bar on the national level," noting that the Lead Plaintiff selected Robbins Geller because of the Firm's "outstanding reputation, experience, and success in securities litigation nationwide." *Id.* at 790.

  The court further stated that "Lead Counsel's fearsome reputation and successful track record undoubtedly were substantial factors in . . . obtaining these recoveries." *Id.*

  Finally, Judge Harmon stated: "As this Court has explained [this is] an extraordinary group of attorneys who achieved the largest settlement fund ever despite the great odds against them." *Id.* at 828.

- ***Jaffe v. Household Int'l, Inc.***, No. 02-C-05893 (N.D. Ill). As sole lead counsel, Robbins Geller obtained a record-breaking settlement of ***$1.575 billion*** after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a securities fraud verdict in favor of the class. In 2015, the Seventh Circuit Court of Appeals upheld the jury's verdict that defendants made false or misleading statements of material fact about the company's business practices and financial results, but remanded the case for a new trial on the issue of whether the individual defendants "made" certain false statements, whether those false statements caused plaintiffs' losses, and the amount of damages. The parties reached an agreement to settle the case just hours before the retrial was scheduled to begin on June 6, 2016. ***The $1.575 billion settlement, approved in October 2016, is the largest ever following a securities fraud class action trial, the largest securities fraud settlement in***

the Seventh Circuit and the seventh-largest settlement ever in a post-PSLRA securities fraud case. According to published reports, the case was just the seventh securities fraud case tried to a verdict since the passage of the PSLRA.

In approving the settlement, the Honorable Jorge L. Alonso noted the team's "skill and determination" while recognizing that "Lead Counsel prosecuted the case vigorously and skillfully over 14 years against nine of the country's most prominent law firms" and "achieved an exceptionally significant recovery for the class." The court added that the team faced "significant hurdles" and "uphill battles" throughout the case and recognized that "[c]lass counsel performed a very high-quality legal work in the context of a thorny case in which the state of the law has been and is in flux." The court succinctly concluded that the settlement was "a spectacular result for the class." *Jaffe v. Household Int'l, Inc.*, No. 02-C-5892, 2016 U.S. Dist. LEXIS 156921, at *8 (N.D. Ill. Nov. 10, 2016); *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893, Transcript at 56, 65 (N.D. Ill. Oct. 20, 2016).

- ***In re NASDAQ Market-Makers Antitrust Litig.***, MDL No. 1023 (S.D.N.Y.). Robbins Geller attorneys served as court-appointed co-lead counsel for a class of investors. The class alleged that the NASDAQ market-makers set and maintained wide spreads pursuant to an industry-wide conspiracy in one of the largest and most important antitrust cases in recent history. After years of intense litigation, the case was settled for a total of $1.027 billion, at the time the largest ever antitrust settlement. An excerpt from the court's opinion reads:

  > Counsel for the Plaintiffs are preeminent in the field of class action litigation, and the roster of counsel for the Defendants includes some of the largest, most successful and well regarded law firms in the country. It is difficult to conceive of better representation than the parties to this action achieved.

  In re NASDAQ Market-Makers Antitrust Litig., 187 F.R.D. 465, 474 (S.D.N.Y. 1998).

- ***Hall v. NCAA (Restricted Earnings Coach Antitrust Litigation)***, No. 94-2392 (D. Kan.). Robbins Geller attorneys were lead counsel and lead trial counsel for one of three classes of coaches in these consolidated price-fixing actions against the National Collegiate Athletic Association. On May 4, 1998, the jury returned verdicts in favor of the three classes for more than $70 million.

- ***In re UnitedHealth Grp. Inc. PSLRA Litig.***, No. 06-CV-1691 (D. Minn.). In the *UnitedHealth* case, Robbins Geller represented the California Public Employees' Retirement System ("CalPERS") and demonstrated its willingness to vigorously advocate for its institutional clients, even under the most difficult circumstances. For example, in 2006, the issue of high-level executives backdating stock options made national headlines. During that time, many law firms, including Robbins Geller, brought shareholder derivative lawsuits against the companies' boards of directors for breaches of their fiduciary duties or for improperly granting backdated options. Rather than pursuing a shareholder derivative case, the Firm filed a securities fraud class action against the company on behalf of CalPERS. In doing so, Robbins Geller faced significant and unprecedented legal obstacles with respect to loss causation, *i.e.*, that defendants' actions were responsible for causing the stock losses. Despite these legal hurdles, Robbins Geller obtained an $895 million recovery on behalf of the UnitedHealth shareholders. Shortly after reaching the $895 million settlement with UnitedHealth, the remaining corporate defendants, including former CEO William A. McGuire, also settled. McGuire paid $30 million and returned stock options representing more than three million shares to the shareholders. The total recovery for the class was over $925 million, the largest stock option backdating recovery ever, and ***a recovery that is more than four times larger than the next largest options backdating recovery***. Moreover, Robbins Geller obtained unprecedented corporate governance reforms, including election of a shareholder-nominated member to the company's board of directors, a mandatory holding period for shares acquired by executives via option exercise, and executive compensation reforms that tie pay to performance.

- ***Alaska Elec. Pension Fund v. CitiGroup, Inc. (In re WorldCom Sec. Litig.)***, No. 03 Civ. 8269 (S.D.N.Y.). Robbins Geller attorneys represented more than 50 private and public institutions that opted out of the class action case and sued WorldCom's bankers, officers and directors, and auditors in courts around the country for losses related to WorldCom bond offerings from 1998 to 2001. The Firm's clients included major public institutions from across the country such as CalPERS, CalSTRS, the state pension funds of Maine, Illinois, New Mexico and West Virginia, union pension funds, and private entities such as AIG and Northwestern Mutual. Robbins Geller attorneys recovered more than $650 million for their clients, substantially more than they would have recovered as part of the class.

- ***Luther v. Countrywide Fin. Corp.***, No. 12-cv-05125 (C.D. Cal.). Robbins Geller attorneys secured a $500 million settlement for institutional and individual investors in what is the largest RMBS purchaser class action settlement in history, and one of the largest class action securities settlements of all time. The unprecedented settlement resolves claims against Countrywide and Wall Street banks that issued the securities. The action was the first securities class action case filed against originators and Wall Street banks as a result of the credit crisis. As co-lead counsel Robbins Geller forged through six years of hard-fought litigation, oftentimes litigating issues of first impression, in order to secure the landmark settlement for its clients and the class.

  In approving the settlement, Judge Mariana R. Pfaelzer repeatedly complimented plaintiffs' attorneys, noting that it was "beyond serious dispute that Class Counsel has vigorously prosecuted the Settlement Actions on both the state and federal level over the last six years." Judge Pfaelzer also commented that "[w]ithout a settlement, these cases would continue indefinitely, resulting in significant risks to recovery and continued litigation costs. It is difficult to understate the risks to recovery if litigation had continued." *Me. State Ret. Sys. v. Countrywide Fin. Corp.*, No. 2:10-CV-00302, 2013 U.S. Dist. LEXIS 179190, at *44, *56 (C.D. Cal. Dec. 5, 2013).

  Judge Pfaelzer further noted that the proposed $500 million settlement represents one of the "largest MBS class action settlements to date. Indeed, this settlement easily surpasses the next largest . . . MBS settlement." *Id.* at *59.

- ***In re Wachovia Preferred Sec. & Bond/Notes Litig.***, No. 09-cv-06351 (S.D.N.Y.). In litigation over bonds and preferred securities, issued by Wachovia between 2006 and 2008, Robbins Geller and co-counsel obtained a significant settlement with Wachovia successor Wells Fargo & Company ($590 million) and Wachovia auditor KPMG LLP ($37 million). ***The total settlement – $627 million – is one of the largest credit-crisis settlements involving Securities Act claims and one of the 20 largest securities class action recoveries in history***. The settlement is also one of the biggest securities class action recoveries arising from the credit crisis.

  As alleged in the complaint, the offering materials for the bonds and preferred securities misstated and failed to disclose the true nature and quality of Wachovia's mortgage loan portfolio, which exposed the bank and misled investors to tens of billions of dollars in losses on mortgage-related assets. In reality, Wachovia employed high-risk underwriting standards and made loans to subprime borrowers, contrary to the offering materials and their statements of "pristine credit quality." Robbins Geller served as co-lead counsel representing the City of Livonia Employees' Retirement System, Hawaii Sheet Metal Workers Pension Fund, and the investor class.

- ***In re Cardinal Health, Inc. Sec. Litig.***, No. C2-04-575 (S.D. Ohio). As sole lead counsel representing Cardinal Health shareholders, Robbins Geller obtained a recovery of $600 million for investors. On behalf of the lead plaintiffs, Amalgamated Bank, the New Mexico State Investment Council, and the California Ironworkers Field Trust Fund, the Firm aggressively pursued class claims and won notable courtroom victories, including a favorable decision on defendants' motion to dismiss. *In re Cardinal Health, Inc. Sec. Litigs.*, 426 F. Supp. 2d 688 (S.D. Ohio 2006). At the time, the $600 million settlement was the tenth-largest settlement in the history of securities fraud litigation and is the largest-ever recovery in a securities fraud action in the Sixth Circuit. Judge Marbley commented:

  > The quality of representation in this case was superb. Lead Counsel, [Robbins Geller], are nationally recognized leaders in complex securities litigation class actions. The quality of the representation is demonstrated by the substantial benefit achieved for the Class and the efficient, effective prosecution and resolution of this action. Lead Counsel defeated a volley of motions to dismiss, thwarting well-formed challenges from prominent and capable attorneys from six different law firms.

  In re Cardinal Health Inc. Sec. Litigs., 528 F. Supp. 2d 752, 768 (S.D. Ohio 2007).

- ***AOL Time Warner Cases I & II***, JCCP Nos. 4322 & 4325 (Cal. Super. Ct., Los Angeles Cty.). Robbins Geller represented The Regents of the University of California, six Ohio state pension funds, Rabo Bank (NL), the Scottish Widows Investment Partnership, several Australian public and private funds, insurance companies, and numerous additional institutional investors, both domestic and international, in state and federal court opt-out litigation stemming from Time Warner's disastrous 2001 merger with Internet high flier America Online. Robbins Geller attorneys exposed a massive and sophisticated accounting fraud involving America Online's e-commerce and advertising revenue. After almost four years of litigation involving extensive discovery, the Firm secured combined settlements for its opt-out clients totaling over $629 million just weeks before The Regents' case pending in California state court was scheduled to go to trial. The Regents' gross recovery of $246 million is the largest individual opt-out securities recovery in history.

- ***Abu Dhabi Commercial Bank v. Morgan Stanley & Co.***, No. 1:08-cv-07508-SAS-DCF (S.D.N.Y.), and ***King County, Washington v. IKB Deutsche Industriebank AG***, No. 1:09-cv-08387-SAS (S.D.N.Y.). The Firm represented multiple institutional investors in successfully pursuing recoveries from two failed structured investment vehicles, each of which had been rated "AAA" by Standard & Poors and Moody's, but which failed fantastically in 2007. The matter settled just prior to trial in 2013. This result was only made possible after Robbins Geller lawyers beat back the rating agencies' longtime argument that ratings were opinions protected by the First Amendment.

- ***In re HealthSouth Corp. Sec. Litig***., No. CV-03-BE-1500-S (N.D. Ala.). As court-appointed co-lead counsel, Robbins Geller attorneys obtained a combined recovery of $671 million from HealthSouth, its auditor Ernst & Young, and its investment banker, UBS, for the benefit of stockholder plaintiffs. The settlement against HealthSouth represents one of the larger settlements in securities class action history and is considered among the top 15 settlements achieved after passage of the PSLRA. Likewise, the settlement against Ernst & Young is one of the largest securities class action settlements entered into by an accounting firm since the passage of the PSLRA. HealthSouth and its financial advisors perpetrated one of the largest and most pervasive frauds in the history of U.S. healthcare, prompting Congressional and law enforcement inquiry and resulting in guilty pleas of 16 former HealthSouth executives in related federal criminal prosecutions. In March 2009, Judge Karon Bowdre commented in the *HealthSouth* class certification opinion: "The court has had many opportunities since November 2001 to examine the work of class counsel and the supervision by the Class Representatives. The court finds both to be far more than adequate." *In re HealthSouth Corp. Sec. Litig*., 257 F.R.D. 260, 275 (N.D. Ala. 2009).

- ***In re Dynegy Inc. Sec. Litig.***, No. H-02-1571 (S.D. Tex.). As sole lead counsel representing The Regents of the University of California and the class of Dynegy investors, Robbins Geller attorneys obtained a combined settlement of $474 million from Dynegy, Citigroup, Inc. and Arthur Andersen LLP for their involvement in a clandestine financing scheme known as Project Alpha. Given Dynegy's limited ability to pay, Robbins Geller attorneys structured a settlement (reached shortly before the commencement of trial) that maximized plaintiffs' recovery without bankrupting the company. Most notably, the settlement agreement provides that Dynegy will appoint two board members to be nominated by The Regents, which Robbins Geller and The Regents believe will benefit all of Dynegy's stockholders.

- ***Jones v. Pfizer Inc.***, No. 1:10-cv-03864 (S.D.N.Y.). Lead plaintiff Stichting Philips Pensioenfonds obtained a $400 million settlement on behalf of class members who purchased Pfizer Inc. common stock during the January 19, 2006 to January 23, 2009 class period. The settlement against Pfizer resolves accusations that it misled investors about an alleged off-label drug marketing scheme. As sole lead counsel, Robbins Geller attorneys helped achieve this exceptional result after five years of hard-fought litigation against the toughest and the brightest members of the securities defense bar by litigating this case all the way to trial.

  In approving the settlement, United States District Judge Alvin K. Hellerstein commended the Firm, noting that "[w]ithout the quality and the toughness that you have exhibited, our society would not be as good as it is with all its problems. So from me to you is a vote of thanks for devoting yourself to this work and doing it well. . . . You did a really good job. Congratulations."

- ***In re Qwest Commc'ns Int'l, Inc. Sec. Litig.***, No. 01-cv-1451 (D. Colo.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Qwest securities. In July 2001, the Firm filed the initial complaint in this action on behalf of its clients, long before any investigation into Qwest's financial statements was initiated by the SEC or Department of Justice. After five years of litigation, lead plaintiffs entered into a settlement with Qwest and certain individual defendants that provided a $400 million recovery for the class and created a mechanism that allowed the vast majority of class

members to share in an additional $250 million recovered by the SEC. In 2008, Robbins Geller attorneys recovered an additional $45 million for the class in a settlement with defendants Joseph P. Nacchio and Robert S. Woodruff, the CEO and CFO, respectively, of Qwest during large portions of the class period.

- ***Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.***, No. 1:09-cv-03701 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel for a class of investors and obtained court approval of a $388 million recovery in nine 2007 residential mortgage-backed securities offerings issued by J.P. Morgan. The settlement represents, on a percentage basis, the largest recovery ever achieved in an MBS purchaser class action. The result was achieved after more than five years of hard-fought litigation and an extensive investigation. In granting approval of the settlement, the court stated the following about Robbins Geller attorneys litigating the case: "[T]here is no question in my mind that this is a very good result for the class and that the plaintiffs' counsel fought the case very hard with extensive discovery, a lot of depositions, several rounds of briefing of various legal issues going all the way through class certification."

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, No. 1:08-cv-10783 (S.D.N.Y.). As sole lead counsel, Robbins Geller obtained a $272 million settlement on behalf of Goldman Sachs' shareholders. The settlement concludes one of the last remaining mortgage-backed securities purchaser class actions arising out of the global financial crisis. The remarkable result was achieved following seven years of extensive litigation. After the claims were dismissed in 2010, Robbins Geller secured a landmark victory from the Second Circuit Court of Appeals that clarified the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of MBS investors. Specifically, the Second Circuit's decision rejected the concept of "tranche" standing and concluded that a lead plaintiff in an MBS class action has class standing to pursue claims on behalf of purchasers of other securities that were issued from the same registration statement and backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities.

  In approving the settlement, the Honorable Loretta A. Preska of the Southern District of New York complimented Robbins Geller attorneys, noting:

  > Counsel, thank you for your papers. They were, by the way, extraordinary papers in support of the settlement, and I will particularly note Professor Miller's declaration in which he details the procedural aspects of the case and then speaks of plaintiffs' counsel's success in the Second Circuit essentially changing the law.
  >
> I will also note what counsel have said, and that is that this case illustrates the proper functioning of the statute.
  >
> * * *
  >
> Counsel, you can all be proud of what you've done for your clients. You've done an extraordinarily good job.

  NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co., No. 1:08-cv-10783, Transcript at 10-11 (S.D.N.Y. May 2, 2016).

- ***Schuh v. HCA Holdings, Inc.***, No. 3:11-cv-01033 (M.D. Tenn.). As sole lead counsel, Robbins Geller obtained a groundbreaking $215 million settlement for former HCA Holdings, Inc. shareholders – the largest securities class action recovery ever in Tennessee. Reached shortly before trial was scheduled to commence, the settlement resolves claims that the Registration Statement and

Prospectus HCA filed in connection with the company's massive $4.3 billion 2011 IPO contained material misstatements and omissions. The recovery achieved represents between 34% and 70% of the aggregate class wide damages, far exceeding the typical recovery in a securities class action. At the hearing on final approval of the settlement, the Honorable Kevin H. Sharp described Robbins Geller attorneys as "gladiators" and commented: "Looking at the benefit obtained, the effort that you had to put into it, [and] the complexity in this case . . . I appreciate the work that you all have done on this." *Schuh v. HCA Holdings, Inc.*, No. 3:11-CV-01033, Transcript at 12-13 (M.D. Tenn. Apr. 11, 2016).

- ***Silverman v. Motorola, Inc.***, No. 1:07-cv-04507 (N.D. Ill.). The Firm served as lead counsel on behalf of a class of investors in Motorola, Inc., ultimately recovering $200 million for investors just two months before the case was set for trial. This outstanding result was obtained despite the lack of an SEC investigation or any financial restatement. In May 2012, the Honorable Amy J. St. Eve of the Northern District of Illinois commented: "The representation that [Robbins Geller] provided to the class was significant, both in terms of quality and quantity." *Silverman v. Motorola, Inc.*, No. 07 C 4507, 2012 U.S. Dist. LEXIS 63477, at *11 (N.D. Ill. May 7, 2012), *aff'd*, 739 F.3d 956 (7th Cir. 2013).

  In affirming the district court's award of attorneys' fees, the Seventh Circuit noted that "no other law firm was willing to serve as lead counsel. Lack of competition not only implies a higher fee but also suggests that most members of the securities bar saw this litigation as too risky for their practices." *Silverman v. Motorola Sols., Inc.*, 739 F.3d 956, 958 (7th Cir. 2013).

- ***In re AT&T Corp. Sec. Litig.***, MDL No. 1399 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased AT&T common stock. The case charged defendants AT&T and its former Chairman and CEO, C. Michael Armstrong, with violations of the federal securities laws in connection with AT&T's April 2000 initial public offering of its wireless tracking stock, the largest IPO in American history. After two weeks of trial, and on the eve of scheduled testimony by Armstrong and infamous telecom analyst Jack Grubman, defendants agreed to settle the case for $100 million. In granting approval of the settlement, the court stated the following about the Robbins Geller attorneys handling the case:

  > Lead Counsel are highly skilled attorneys with great experience in prosecuting complex securities action[s], and their professionalism and diligence displayed during [this] litigation substantiates this characterization. The Court notes that Lead Counsel displayed excellent lawyering skills through their consistent preparedness during court proceedings, arguments and the trial, and their well-written and thoroughly researched submissions to the Court. Undoubtedly, the attentive and persistent effort of Lead Counsel was integral in achieving the excellent result for the Class.

  In re AT&T Corp. Sec. Litig., MDL No. 1399, 2005 U.S. Dist. LEXIS 46144, at *28-*29 (D.N.J. Apr. 25, 2005), *aff'd*, 455 F.3d 160 (3d Cir. 2006).

- ***In re Dollar Gen. Corp. Sec. Litig.***, No. 01-CV-00388 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel in this case in which the Firm recovered $172.5 million for investors. The *Dollar General* settlement was the largest shareholder class action recovery ever in Tennessee.

- ***Carpenters Health & Welfare Fund v. Coca-Cola Co.***, No. 00-CV-2838 (N.D. Ga.). As co-lead counsel representing Coca-Cola shareholders, Robbins Geller attorneys obtained a recovery of $137.5 million after nearly eight years of litigation. Robbins Geller attorneys traveled to three continents to uncover the evidence that ultimately resulted in the settlement of this hard-fought litigation. The case concerned Coca-Cola's shipping of excess concentrate at the end of financial reporting periods for the sole purpose of meeting analyst earnings expectations, as well as the company's failure to properly account for certain impaired foreign bottling assets.

- ***Schwartz v. TXU Corp.***, No. 02-CV-2243 (N.D. Tex.). As co-lead counsel, Robbins Geller attorneys obtained a recovery of over $149 million for a class of purchasers of TXU securities. The recovery compensated class members for damages they incurred as a result of their purchases of TXU securities at inflated prices. Defendants had inflated the price of these securities by concealing the fact that TXU's operating earnings were declining due to a deteriorating gas pipeline and the failure of the company's European operations.

- ***In re Doral Fin. Corp. Sec. Litig.***, 05 MDL No. 1706 (S.D.N.Y.). In July 2007, the Honorable Richard Owen of the Southern District of New York approved the $129 million settlement, finding in his order:

> The services provided by Lead Counsel [Robbins Geller] were efficient and highly successful, resulting in an outstanding recovery for the Class without the substantial expense, risk and delay of continued litigation. Such efficiency and effectiveness supports the requested fee percentage.
>
> Cases brought under the federal securities laws are notably difficult and notoriously uncertain. . . . Despite the novelty and difficulty of the issues raised, Lead Plaintiffs' counsel secured an excellent result for the Class.
>
> . . . Based upon Lead Plaintiff's counsel's diligent efforts on behalf of the Class, as well as their skill and reputations, Lead Plaintiff's counsel were able to negotiate a very favorable result for the Class. . . . The ability of [Robbins Geller] to obtain such a favorable partial settlement for the Class in the face of such formidable opposition confirms the superior quality of their representation . . . .

In re Doral Fin. Corp. Sec. Litig., No. 1:05-md-01706, Order at 4-5 (S.D.N.Y. July 17, 2007).

- ***In re Exxon Valdez***, No. A89 095 Civ. (D. Alaska), and ***In re Exxon Valdez Oil Spill Litig.***, No. 3 AN 89 2533 (Alaska Super. Ct., 3d Jud. Dist.). Robbins Geller attorneys served on the Plaintiffs' Coordinating Committee and Plaintiffs' Law Committee in this massive litigation resulting from the Exxon Valdez oil spill in Alaska in March 1989. The jury awarded hundreds of millions in compensatory damages, as well as $5 billion in punitive damages (the latter were later reduced by the U.S. Supreme Court to $507 million).

- ***Mangini v. R.J. Reynolds Tobacco Co.***, No. 939359 (Cal. Super. Ct., San Francisco Cty.). In this case, R.J. Reynolds admitted that "the *Mangini* action, and the way that it was vigorously litigated, was an early, significant and unique driver of the overall legal and social controversy regarding underage smoking that led to the decision to phase out the Joe Camel Campaign."

- ***Does I v. The Gap, Inc.***, No. 01 0031 (D. N. Mar. I.). In this groundbreaking case, Robbins Geller attorneys represented a class of 30,000 garment workers who alleged that they had worked under sweatshop conditions in garment factories in Saipan that produced clothing for top U.S. retailers such as The Gap, Target and J.C. Penney. In the first action of its kind, Robbins Geller attorneys pursued claims against the factories and the retailers alleging violations of RICO, the Alien Tort Claims Act, and the Law of Nations based on the alleged systemic labor and human rights abuses occurring in Saipan. This case was a companion to two other actions: ***Does I v. Advance Textile Corp.***, No. 99 0002 (D. N. Mar. I.), which alleged overtime violations by the garment factories under the Fair Labor Standards Act and local labor law, and ***UNITE v. The Gap, Inc.***, No. 300474 (Cal. Super. Ct., San Francisco Cty.), which alleged violations of California's Unfair Practices Law by the U.S. retailers. These actions resulted in a settlement of approximately $20 million that included a comprehensive monitoring program to address past violations by the factories and prevent future ones. The members of the litigation team

were honored as Trial Lawyers of the Year by the Trial Lawyers for Public Justice in recognition of the team's efforts in bringing about the precedent-setting settlement of the actions.

- ***In re Prison Realty Sec. Litig.***, No. 3:99-0452 (M.D. Tenn.). Robbins Geller attorneys served as lead counsel for the class, obtaining a $105 million recovery.

- ***In re Honeywell Int'l, Inc. Sec. Litig.***, No. 00-cv-03605 (D.N.J.). Robbins Geller attorneys served as lead counsel for a class of investors that purchased Honeywell common stock. The case charged Honeywell and its top officers with violations of the federal securities laws, alleging the defendants made false public statements concerning Honeywell's merger with Allied Signal, Inc. and that defendants falsified Honeywell's financial statements. After extensive discovery, Robbins Geller attorneys obtained a $100 million settlement for the class.

- ***Schwartz v. Visa Int'l***, No. 822404-4 (Cal. Super. Ct., Alameda Cty.). After years of litigation and a six-month trial, Robbins Geller attorneys won one of the largest consumer protection verdicts ever awarded in the United States. Robbins Geller attorneys represented California consumers in an action against Visa and MasterCard for intentionally imposing and concealing a fee from their cardholders. The court ordered Visa and MasterCard to return $800 million in cardholder losses, which represented 100% of the amount illegally taken, plus 2% interest. In addition, the court ordered full disclosure of the hidden fee.

- ***Thompson v. Metro. Life Ins. Co.***, No. 00-cv-5071 (S.D.N.Y.). Robbins Geller attorneys served as lead counsel and obtained $145 million for the class in a settlement involving racial discrimination claims in the sale of life insurance.

- ***In re Prudential Ins. Co. of Am. Sales Practices Litig.***, MDL No. 1061 (D.N.J.). In one of the first cases of its kind, Robbins Geller attorneys obtained a settlement of $4 billion for deceptive sales practices in connection with the sale of life insurance involving the "vanishing premium" sales scheme.

Additional Judicial Commendations

Robbins Geller attorneys have been praised by countless judges all over the country for the quality of their representation in class-action lawsuits. In addition to the judicial commendations set forth in the Prominent Cases and Precedent-Setting Decisions sections, judges have acknowledged the successful results of the Firm and its attorneys with the following plaudits:

- On May 31, 2017, in granting final approval of the settlement, the Honorable Gonzalo P. Curiel hailed the settlement as "extraordinary" and "all the more exceptional when viewed in light of the risk" of continued litigation. The court further commended Robbins Geller for prosecuting the case on a *pro bono* basis: "Class Counsel's exceptional decision to provide nearly seven years of legal services to Class Members on a *pro bono* basis evidences not only a lack of collusion, but also that Class Counsel are in fact representing the best interests of Plaintiffs and the Class Members in this Settlement. Instead of seeking compensation for fees and costs that they would otherwise be entitled to, Class Counsel have acted to allow maximum recovery to Plaintiffs and Class Members. Indeed, that Eligible Class Members may receive recovery of 90% or greater is a testament to Class Counsel's representation and dedication to act in their clients' best interest." In addition, at the final approval hearing, the court commented that "this is a case that has been litigated – if not fiercely, zealously throughout." *Low v. Trump Univ., LLC*, No. 3:10-cv-00940-GPC-WVG, 2017 U.S. Dist. LEXIS 49739, at *14-*15, *40-*41 (S.D. Cal. Mar. 31, 2017); *Low v. Trump University LLC and Donald J. Trump*, No. 10-cv-0940 GPC-WVG, and *Cohen v. Donald J. Trump*, No. 13-cv-2519-GPC-WVG, Transcript at 7 (S.D. Cal. Mar. 30, 2017).

- In January 2017, at the final approval hearing, the Honorable Kevin H. Sharp of the Middle District of Tennessee commended Robbins Geller attorneys, stating: "I think y'all have done a great job pulling this [settlement] together. It was complicated, it was drawn out, and a lot of work clearly went into this [case]. . . . I appreciate the work you all did on this. . . . [T]here is some benefit to the shareholders [and the company] that are above and beyond money . . . ." *In re Community Health Sys., Inc. S'holder Derivative Litig.*, No. 3:11-cv-00489, Transcript at 10 (M.D. Tenn. Jan. 17, 2017).

- In December 2016, at the final approval hearing, the Honorable James G. Carr stated: "I kept throwing the case out, and you kept coming back. . . . And it's both remarkable and noteworthy and a credit to you and your firm that you did so. . . . [Y]ou persuaded the Sixth Circuit. As we know, that's no mean feat at all." Judge Carr further complimented the Firm, noting that it "goes without question or even saying" that Robbins Geller is very well-known nationally and that the settlement is an excellent result for the class. He succinctly concluded that "given the tenacity and the time and the effort that [Robbins Geller] lawyers put into [the case]" makes the class "a lot better off." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, No. 3:05-cv-07393-JGC, Transcript at 4, 10, 14, 17 (N.D. Ohio Nov. 18, 2016).

- In September 2016, in granting final approval of the settlement, Judge Arleo commended the "vigorous and skilled efforts" of Robbins Geller attorneys for obtaining "an excellent recovery." Judge Arleo added that the settlement was reached after "contentious, hard-fought litigation" that ended with "a very, very good result for the class" in a "risky case." *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Prudential Fin., Inc.*, No. 2:12-cv-05275-MCA-LDW, Transcript of Hearing at 18-20 (D.N.J. Sept. 28, 2016).

- In August 2015, at the final approval hearing for the settlement, the Honorable Karen M. Humphreys praised Robbins Geller's "extraordinary efforts" and "excellent lawyering," noting that the settlement "really does signal that the best is yet to come for your clients and for your prodigious labor as professionals. . . . I wish more citizens in our country could have an appreciation of what this [settlement] truly represents." *Bennett v. Sprint Nextel Corp.*, No. 2:09-cv-02122-EFM-KMH, Transcript at 8, 25 (D. Kan. Aug. 12, 2015).

- In August 2015, the Honorable Judge Max O. Cogburn, Jr. noted that "plaintiffs' attorneys were able [to] achieve the big success early" in the case and obtained an "excellent result." The "extraordinary" settlement was because of "good lawyers . . . doing their good work." *Nieman v. Duke Energy Corp.*, No. 3:12-cv-456, Transcript at 21, 23, 30 (W.D.N.C. Aug. 12, 2015).

- In July 2015, in approving the settlement, the Honorable Douglas L. Rayes of the District of Arizona stated: "Settlement of the case during pendency of appeal for more than an insignificant amount is rare. The settlement here is substantial and provides favorable recovery for the settlement class under these circumstances." He continued, noting, "[a]s against the objective measures of . . . settlements [in] other similar cases, [the recovery] is on the high end." *Teamsters Local 617 Pension & Welfare Funds v. Apollo Grp., Inc.*, No. 2:06-cv-02674-DLR, Transcript at 8, 11 (D. Ariz. July 28, 2015).

- In June 2015, at the conclusion of the hearing for final approval of the settlement, the Honorable Susan Richard Nelson of the District of Minnesota noted that it was "a pleasure to be able to preside over a case like this," praising Robbins Geller in achieving "an outstanding [result] for [its] clients," as she was "very impressed with the work done on th[e] case." *In re St. Jude Med., Inc. Sec. Litig.*, No. 0:10-cv-00851-SRN-TNL, Transcript at 7 (D. Minn. June 12, 2015).

- In May 2015, at the fairness hearing on the settlement, the Honorable William G. Young noted that the case was "very well litigated" by Robbins Geller attorneys, adding that "I don't just say that as a matter of form. . . . I thank you for the vigorous litigation that I've been permitted to be a part of." *Courtney v. Avid Tech., Inc.*, No. 1:13-cv-10686-WGY, Transcript at 8-9 (D. Mass. May 12, 2015).

- In January 2015, the Honorable William J. Haynes, Jr. of the Middle District of Tennessee described the settlement as a "highly favorable result achieved for the Class" through Robbins Geller's "diligent prosecution . . . [and] quality of legal services." The settlement represents the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade. *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.*, No. 3:09-cv-00882, 2015 U.S. Dist. LEXIS 181943, at *6-*7 (M.D. Tenn. Jan. 16, 2015).

- In September 2014, in approving the settlement for shareholders, Vice Chancellor John W. Noble noted "[t]he litigation caused a substantial benefit for the class. It is unusual to see a $29 million recovery." Vice Chancellor Noble characterized the litigation as "novel" and "not easy," but "[t]he lawyers took a case and made something of it." The Court commended Robbins Geller's efforts in obtaining this result: "The standing and ability of counsel cannot be questioned" and "the benefits achieved by plaintiffs' counsel in this case cannot be ignored." *In re Gardner Denver, Inc. S'holder Litig.*, No. 8505-VCN, Transcript at 26-28 (Del. Ch. Sept. 3, 2014).

- In May 2014, at the conclusion of the hearing for final approval of the settlement, the Honorable Elihu M. Berle stated: "I would finally like to congratulate counsel on their efforts to resolve this case, on excellent work – it was the best interest of the class – and to the exhibition of professionalism. So I do thank you for all your efforts." *Liberty Mutual Overtime Cases*, No. JCCP 4234, Transcript at 20:1-5 (Cal. Super. Ct., Los Angeles Cty. May 29, 2014).

- In March 2014, Ninth Circuit Judge J. Clifford Wallace (presiding) expressed the gratitude of the court: "Thank you. I want to especially thank counsel for this argument. This is a very complicated case and I think we were assisted no matter how we come out by competent counsel coming well prepared. . . . It was a model of the type of an exercise that we appreciate. Thank you very much for your work . . . you were of service to the court." *Eclectic Properties East, LLC v. The Marcus & Millichap Co.*, No. 12-16526, Transcript (9th Cir. Mar. 14, 2014).

- In February 2014, in approving a settlement, Judge Edward M. Chen noted the "very substantial risks" in the case and recognized Robbins Geller had performed "extensive work on the case." *In re VeriFone Holdings, Inc. Sec. Litig.*, No. C-07-6140, 2014 U.S. Dist. LEXIS 20044, at *5, *11-*12 (N.D. Cal. Feb. 18, 2014).

- In August 2013, in granting final approval of the settlement, the Honorable Richard J. Sullivan stated: "Lead Counsel is to be commended for this result: it expended considerable effort and resources over the course of the action researching, investigating, and prosecuting the claims, at significant risk to itself, and in a skillful and efficient manner, to achieve an outstanding recovery for class members. Indeed, the result – and the class's embrace of it – is a testament to the experience and tenacity Lead Counsel brought to bear." *City of Livonia Emps. Ret. Sys. v. Wyeth*, No. 07 Civ. 10329, 2013 U.S. Dist. LEXIS 113658, at *13 (S.D.N.Y. Aug. 7, 2013).

- In July 2013, in granting final approval of the settlement, the Honorable William H. Alsup stated that Robbins Geller did "excellent work in this case," and continued, "I look forward to seeing you on the next case." *Fraser v. Asus Comput. Int'l*, No. C 12-0652, Transcript at 12:2-3 (N.D. Cal. July 11, 2013).

- In June 2013, in certifying the class, U.S. District Judge James G. Carr recognized Robbins Geller's steadfast commitment to the class, noting that "plaintiffs, with the help of Robbins Geller, have twice successfully appealed this court's orders granting defendants' motion to dismiss." *Plumbers & Pipefitters Nat'l Pension Fund v. Burns*, 292 F.R.D. 515, 524 (N.D. Ohio 2013).

- In November 2012, in granting appointment of lead plaintiff, Chief Judge James F. Holderman commended Robbins Geller for its "substantial experience in securities class action litigation and is recognized as 'one of the most successful law firms in securities class actions, if not the preeminent one, in the country.' *In re Enron Corp. Sec.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008) (Harmon, J.)." He continued further that, "'Robbins Geller attorneys are responsible for obtaining the largest securities fraud class action recovery ever [$***7.2*** billion in *Enron*], as well as the largest recoveries in the Fifth, Sixth, Eighth, Tenth and Eleventh Circuits.'" *Bristol Cty. Ret. Sys. v. Allscripts Healthcare Sols., Inc.*, No. 12 C 3297, 2012 U.S. Dist. LEXIS 161441 at *21 (N.D. Ill. Nov. 9, 2012).

- In June 2012, in granting plaintiffs' motion for class certification, the Honorable Inge Prytz Johnson noted that other courts have referred to Robbins Geller as "'one of the most successful law firms in securities class actions . . . in the country.'" *Local 703, I.B. v. Regions Fin. Corp.*, 282 F.R.D. 607, 616 (N.D. Ala. 2012) (quoting *In re Enron Corp. Sec. Litig.*, 586 F. Supp. 2d 732, 797 (S.D. Tex. 2008)), *aff'd in part and vacated in part on other grounds*, 762 F.3d 1248 (11th Cir. 2014).

- In June 2012, in granting final approval of the settlement, the Honorable Barbara S. Jones commented that "class counsel's representation, from the work that I saw, appeared to me to be of the highest quality." *In re CIT Grp. Inc. Sec. Litig.*, No. 08 Civ. 6613, Transcript at 9:16-18 (S.D.N.Y. June 13, 2012).

- In March 2012, in granting certification for the class, Judge Robert W. Sweet referenced the *Enron* case, agreeing that Robbins Geller's "'clearly superlative litigating and negotiating skills'" give the Firm an "'outstanding reputation, experience, and success in securities litigation nationwide,'" thus, "'[t]he experience, ability, and reputation of the attorneys of [Robbins Geller] is not disputed; it is one of the most successful law firms in securities class actions, if not the preeminent one, in the country.'" *Billhofer v. Flamel Techs., S.A.*, 281 F.R.D. 150, 158 (S.D.N.Y. 2012).

- In March 2011, in denying defendants' motion to dismiss, Judge Richard Sullivan commented: "Let me thank you all. . . . [The motion] was well argued . . . and . . . well briefed . . . . I certainly appreciate having good lawyers who put the time in to be prepared . . . ." *Anegada Master Fund Ltd. v. PxRE Grp. Ltd.*, No. 08-cv-10584, Transcript at 83 (S.D.N.Y. Mar. 16, 2011).

- In January 2011, the court praised Robbins Geller attorneys: "They have gotten very good results for stockholders. . . . [Robbins Geller has] such a good track record." *In re Compellent Technologies, Inc. S'holder Litig.*, No. 6084-VCL, Transcript at 20-21 (Del. Ch. Jan. 13, 2011).

- In August 2010, in reviewing the settlement papers submitted by the Firm, Judge Carlos Murguia stated that Robbins Geller performed "a commendable job of addressing the relevant issues with great detail and in a comprehensive manner . . . . The court respects the [Firm's] experience in the field of derivative [litigation]." *Alaska Elec. Pension Fund v. Olofson*, No. 08-cv-02344-CM-JPO (D. Kan.) (Aug. 20, 2010 e-mail from court re: settlement papers).

- In June 2009, Judge Ira Warshawsky praised the Firm's efforts in *In re Aeroflex, Inc. S'holder Litig.*: "There is no doubt that the law firms involved in this matter represented in my opinion the cream of the crop of class action business law and mergers and acquisition litigators, and from a judicial point of view it was a pleasure working with them." *In re Aeroflex, Inc. S'holder Litig.*, No. 003943/07, Transcript at 25:14-18 (N.Y. Sup. Ct., Nassau Cty. June 30, 2009).

- In March 2009, in granting class certification, the Honorable Robert Sweet of the Southern District of New York commented in *In re NYSE Specialists Sec. Litig.*, 260 F.R.D. 55, 74 (S.D.N.Y. 2009): "As to the second prong, the Specialist Firms have not challenged, in this motion, the qualifications, experience, or ability of counsel for Lead Plaintiff, [Robbins Geller], to conduct this litigation. Given [Robbins Geller's] substantial experience in securities class action litigation and the extensive discovery already conducted in this case, this element of adequacy has also been satisfied."

- In June 2008, the court commented, "Plaintiffs' lead counsel in this litigation, [Robbins Geller], has demonstrated its considerable expertise in shareholder litigation, diligently advocating the rights of Home Depot shareholders in this Litigation. [Robbins Geller] has acted with substantial skill and professionalism in representing the plaintiffs and the interests of Home Depot and its shareholders in prosecuting this case." *City of Pontiac General Employees' Ret. Sys. v. Langone*, No. 2006-122302, Findings of Fact in Support of Order and Final Judgment at 2 (Ga. Super. Ct., Fulton Cty. June 10, 2008).

- In a December 2006 hearing on the $50 million consumer privacy class action settlement in *Kehoe v. Fidelity Fed. Bank & Tr.*, No. 03-80593-CIV (S.D. Fla.), United States District Court Judge Daniel T.K. Hurley said the following:

  > First, I thank counsel. As I said repeatedly on both sides, we have been very, very fortunate. We have had fine lawyers on both sides. The issues in the case are significant issues. We are talking about issues dealing with consumer protection and privacy. Something that is increasingly important today in our society. . . . I want you to know I thought long and hard about this. I am absolutely satisfied that the settlement is a fair and reasonable settlement. . . . I thank the lawyers on both sides for the extraordinary effort that has been brought to bear here . . . .

  Kehoe v. Fidelity Fed. Bank & Tr., No. 03-80593-CIV, Transcript at 26, 28-29 (S.D. Fla. Dec. 7, 2007).

- In *Stanley v. Safeskin Corp.*, No. 99 CV 454 (S.D. Cal.), where Robbins Geller attorneys obtained $55 million for the class of investors, Judge Moskowitz stated:

  > I said this once before, and I'll say it again. I thought the way that your firm handled this case was outstanding. This was not an easy case. It was a complicated case, and every step of the way, I thought they did a very professional job.

  Stanley v. Safeskin Corp., No. 99 CV 454, Transcript at 13 (S.D. Cal. May 25, 2004).

Precedent-Setting Decisions

Robbins Geller attorneys operate at the forefront of litigation. Our work often changes the legal landscape, resulting in an environment that is more-favorable for obtaining recoveries for our clients.

Investor and Shareholder Rights

- ***NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.***, 693 F.3d 145 (2d Cir. 2012). In a securities fraud action involving mortgage-backed securities, the Second Circuit rejected the concept of "tranche" standing and found that a lead plaintiff has class standing to pursue claims on behalf of purchasers of securities that were backed by pools of mortgages originated by the same lenders who had originated mortgages backing the lead plaintiff's securities. The court noted that, given those common lenders, the lead plaintiff's claims as to its purchases implicated "the same set of concerns" that purchasers in several of the other offerings possessed. The court also rejected the notion that the lead plaintiff lacked standing to represent investors in different tranches.

- ***In re VeriFone Holdings, Inc. Sec. Litig.***, 704 F.3d 694 (9th Cir. 2012). The panel reversed in part and affirmed in part the dismissal of investors' securities fraud class action alleging violations of §§10(b), 20(a), and 20A of the Securities Exchange Act of 1934 and SEC Rule 10b-5 in connection with a restatement of financial results of the company in which the investors had purchased stock.

  The panel held that the third amended complaint adequately pleaded the §10(b), §20A and Rule 10b-5 claims. Considering the allegations of scienter holistically, as the U.S. Supreme Court directed in *Matrixx Initiatives, Inc. v. Siracusano*, 563 U.S 27, 48-49 (2011), the panel concluded that the inference that the defendant company and its chief executive officer and former chief financial officer were deliberately reckless as to the truth of their financial reports and related public statements following a merger was at least as compelling as any opposing inference.

- ***Fox v. JAMDAT Mobile, Inc.***, 185 Cal. App. 4th 1068 (2010). Concluding that Delaware's shareholder ratification doctrine did not bar the claims, the California Court of Appeal reversed dismissal of a shareholder class action alleging breach of fiduciary duty in a corporate merger.

- ***In re Constar Int'l Inc. Sec. Litig.***, 585 F.3d 774 (3d Cir. 2009). The Third Circuit flatly rejected defense contentions that where relief is sought under §11 of the Securities Act of 1933, which imposes liability when securities are issued pursuant to an incomplete or misleading registration statement, class certification should depend upon findings concerning market efficiency and loss causation.

- ***Matrixx Initiatives, Inc. v. Siracusano***, 563 U.S 27 (2011), *aff'g* 585 F.3d 1167 (9th Cir. 2009). In a securities fraud action involving the defendants' failure to disclose a possible link between the company's popular cold remedy and a life-altering side effect observed in some users, the U.S. Supreme Court unanimously affirmed the Ninth Circuit's (a) rejection of a bright-line "statistical significance" materiality standard, and (b) holding that plaintiffs had successfully pleaded a strong inference of the defendants' scienter.

- ***Alaska Elec. Pension Fund v. Flowserve Corp.***, 572 F.3d 221 (5th Cir. 2009). Aided by former U.S. Supreme Court Justice O'Connor's presence on the panel, the Fifth Circuit reversed a district court order denying class certification and also reversed an order granting summary judgment to

defendants. The court held that the district court applied an incorrect fact-for-fact standard of loss causation, and that genuine issues of fact on loss causation precluded summary judgment.

- ***In re F5 Networks, Inc., Derivative Litig.***, 207 P.3d 433 (Wash. 2009). In a derivative action alleging unlawful stock option backdating, the Supreme Court of Washington ruled that shareholders need not make a pre-suit demand on the board of directors where this step would be futile, agreeing with plaintiffs that favorable Delaware case law should be followed as persuasive authority.

- ***Lormand v. US Unwired, Inc.***, 565 F.3d 228 (5th Cir. 2009). In a rare win for investors in the Fifth Circuit, the court reversed an order of dismissal, holding that safe harbor warnings were not meaningful when the facts alleged established a strong inference that defendants knew their forecasts were false. The court also held that plaintiffs sufficiently alleged loss causation.

- ***Institutional Inv'rs Grp. v. Avaya, Inc.***, 564 F.3d 242 (3d Cir. 2009). In a victory for investors in the Third Circuit, the court reversed an order of dismissal, holding that shareholders pled with particularity why the company's repeated denials of price discounts on products were false and misleading when the totality of facts alleged established a strong inference that defendants knew their denials were false.

- ***Alaska Elec. Pension Fund v. Pharmacia Corp.***, 554 F.3d 342 (3d Cir. 2009). The Third Circuit held that claims filed for violation of §10(b) of the Securities Exchange Act of 1934 were timely, adopting investors' argument that because scienter is a critical element of the claims, the time for filing them cannot begin to run until the defendants' fraudulent state of mind should be apparent.

- ***Rael v. Page***, 222 P.3d 678 (N.M. Ct. App. 2009). In this shareholder class and derivative action, Robbins Geller attorneys obtained an appellate decision reversing the trial court's dismissal of the complaint alleging serious director misconduct in connection with the merger of SunCal Companies and Westland Development Co., Inc., a New Mexico company with large and historic landholdings and other assets in the Albuquerque area. The appellate court held that plaintiff's claims for breach of fiduciary duty were direct, not derivative, because they constituted an attack on the validity or fairness of the merger and the conduct of the directors. Although New Mexico law had not addressed this question directly, at the urging of the Firm's attorneys, the court relied on Delaware law for guidance, rejecting the "special injury" test for determining the direct versus derivative inquiry and instead applying more recent Delaware case law.

- ***Lane v. Page***, No. 06-cv-1071 (D.N.M. 2012). In May 2012, while granting final approval of the settlement in the federal component of the Westland cases, Judge Browning in the District of New Mexico commented:

> Class Counsel are highly skilled and specialized attorneys who use their substantial experience and expertise to prosecute complex securities class actions. In possibly one of the best known and most prominent recent securities cases, Robbins Geller served as sole lead counsel – *In re Enron Corp. Sec. Litig.*, No. H-01-3624 (S.D. Tex.). *See* Report at 3. The Court has previously noted that the class would "receive high caliber legal representation" from class counsel, and throughout the course of the litigation the Court has been impressed with the quality of representation on each side. *Lane v. Page*, 250 F.R.D. at 647.

Lane v. Page, 862 F. Supp. 2d 1182, 1253-54 (D.N.M. 2012).

In addition, Judge Browning stated, "'Few plaintiffs' law firms could have devoted the kind of time, skill, and financial resources over a five-year period necessary to achieve the pre- and post-Merger benefits

obtained for the class here.' . . . [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class [Robbins Geller is] both skilled and experienced, and used those skills and experience for the benefit of the class." *Id.* at 1254.

- ***Luther v. Countrywide Home Loans Servicing LP***, 533 F.3d 1031 (9th Cir. 2008). In a case of first impression, the Ninth Circuit held that the Securities Act of 1933's specific non-removal features had not been trumped by the general removal provisions of the Class Action Fairness Act of 2005.

- ***In re Gilead Scis. Sec. Litig.***, 536 F.3d 1049 (9th Cir. 2008). The Ninth Circuit upheld defrauded investors' loss causation theory as plausible, ruling that a limited temporal gap between the time defendants' misrepresentation was publicly revealed and the subsequent decline in stock value was reasonable where the public had not immediately understood the impact of defendants' fraud.

- ***In re WorldCom Sec. Litig.***, 496 F.3d 245 (2d Cir. 2007). The Second Circuit held that the filing of a class action complaint tolls the limitations period for all members of the class, including those who choose to opt out of the class action and file their own individual actions without waiting to see whether the district court certifies a class – reversing the decision below and effectively overruling multiple district court rulings that *American Pipe* tolling did not apply under these circumstances.

- ***In re Merck & Co. Sec., Derivative & ERISA Litig.***, 493 F.3d 393 (3d Cir. 2007). In a shareholder derivative suit appeal, the Third Circuit held that the general rule that discovery may not be used to supplement demand-futility allegations does not apply where the defendants enter a voluntary stipulation to produce materials relevant to demand futility without providing for any limitation as to their use. In April 2007, the Honorable D. Brooks Smith praised Robbins Geller partner Joe Daley's efforts in this litigation:

  > Thank you very much Mr. Daley and a thank you to all counsel. As Judge Cowen mentioned, this was an exquisitely well-briefed case; it was also an extremely well-argued case, and we thank counsel for their respective jobs here in the matter, which we will take under advisement. Thank you.

  In re Merck & Co., Inc. Sec., Derivative & ERISA Litig., No. 06-2911, Transcript at 35:37-36:00 (3d Cir. Apr. 12, 2007).

- ***Alaska Elec. Pension Fund v. Brown***, 941 A.2d 1011 (Del. 2007). The Supreme Court of Delaware held that the Alaska Electrical Pension Fund, for purposes of the "corporate benefit" attorney-fee doctrine, was presumed to have caused a substantial increase in the tender offer price paid in a "going private" buyout transaction. The Court of Chancery originally ruled that Alaska's counsel, Robbins Geller, was not entitled to an award of attorney fees, but Delaware's high court, in its published opinion, reversed and remanded for further proceedings.

- ***Crandon Capital Partners v. Shelk***, 157 P.3d 176 (Or. 2007). Oregon's Supreme Court ruled that a shareholder plaintiff in a derivative action may still seek attorney fees even if the defendants took actions to moot the underlying claims. The Firm's attorneys convinced Oregon's highest court to take the case, and reverse, despite the contrary position articulated by both the trial court and the Oregon Court of Appeals.

- ***In re Qwest Commc'ns Int'l***, 450 F.3d 1179 (10th Cir. 2006). In a case of first impression, the Tenth Circuit held that a corporation's deliberate release of purportedly privileged materials to governmental agencies was not a "selective waiver" of the privileges such that the corporation could refuse to produce the same materials to non-governmental plaintiffs in private securities fraud litigation.

- ***In re Guidant S'holders Derivative Litig.***, 841 N.E.2d 571 (Ind. 2006). Answering a certified question from a federal court, the Supreme Court of Indiana unanimously held that a pre-suit demand in a derivative action is excused if the demand would be a futile gesture. The court adopted a "demand futility" standard and rejected defendants' call for a "universal demand" standard that might have immediately ended the case.

- ***Denver Area Meat Cutters v. Clayton***, 209 S.W.3d 584 (Tenn. Ct. App. 2006). The Tennessee Court of Appeals rejected an objector's challenge to a class action settlement arising out of Warren Buffet's 2003 acquisition of Tennessee-based Clayton Homes. In their effort to secure relief for Clayton Homes stockholders, the Firm's attorneys obtained a temporary injunction of the Buffet acquisition for six weeks in 2003 while the matter was litigated in the courts. The temporary halt to Buffet's acquisition received national press attention.

- ***DeJulius v. New Eng. Health Care Emps. Pension Fund***, 429 F.3d 935 (10th Cir. 2005). The Tenth Circuit held that the multi-faceted notice of a $50 million settlement in a securities fraud class action had been the best notice practicable under the circumstances, and thus satisfied both constitutional due process and Rule 23 of the Federal Rules of Civil Procedure.

- ***In re Daou Sys.***, 411 F.3d 1006 (9th Cir. 2005). The Ninth Circuit sustained investors' allegations of accounting fraud and ruled that loss causation was adequately alleged by pleading that the value of the stock they purchased declined when the issuer's true financial condition was revealed.

- ***Barrie v. Intervoice-Brite, Inc.***, 397 F.3d 249 (5th Cir.), *reh'g denied and opinion modified*, 409 F.3d 653 (5th Cir. 2005). The Fifth Circuit upheld investors' accounting-fraud claims, holding that fraud is pled as to both defendants when one knowingly utters a false statement and the other knowingly fails to correct it, even if the complaint does not specify who spoke and who listened.

- ***City of Monroe Emps. Ret. Sys. v. Bridgestone Corp.***, 399 F.3d 651 (6th Cir. 2005). The Sixth Circuit held that a statement regarding objective data supposedly supporting a corporation's belief that its tires were safe was actionable where jurors could have found a reasonable basis to believe the corporation was aware of undisclosed facts seriously undermining the statement's accuracy.

- ***Ill. Mun. Ret. Fund v. Citigroup, Inc.***, 391 F.3d 844 (7th Cir. 2004). The Seventh Circuit upheld a district court's decision that the Illinois Municipal Retirement Fund was entitled to litigate its claims under the Securities Act of 1933 against WorldCom's underwriters before a state court rather than before the federal forum sought by the defendants.

- ***Nursing Home Pension Fund, Local 144 v. Oracle Corp.***, 380 F.3d 1226 (9th Cir. 2004). The Ninth Circuit ruled that defendants' fraudulent intent could be inferred from allegations concerning their false representations, insider stock sales and improper accounting methods.

- ***Southland Sec. Corp. v. INSpire Ins. Sols. Inc.***, 365 F.3d 353 (5th Cir. 2004). The Fifth Circuit sustained allegations that an issuer's CEO made fraudulent statements in connection with a contract announcement.

Consumer Protection

- ***Kwikset Corp. v. Superior Court***, 51 Cal. 4th 310 (2011). In a leading decision interpreting the scope of Proposition 64's new standing requirements under California's Unfair Competition Law (UCL), the California Supreme Court held that consumers alleging that a manufacturer has misrepresented its product have "lost money or property" within the meaning of the initiative, and thus have standing to sue under the UCL, if they "can truthfully allege that they were deceived by a product's label into spending money to purchase the product, and would not have purchased it otherwise." *Id.* at 317. *Kwikset* involved allegations, proven at trial, that defendants violated California's "Made in the U.S.A." statute by representing on their labels that their products were "Made in U.S.A." or "All-American Made" when, in fact, the products were substantially made with foreign parts and labor.

- ***Safeco Ins. Co. of Am. v. Superior Court***, 173 Cal. App. 4th 814 (2009). In a class action against auto insurer Safeco, the California Court of Appeal agreed that the plaintiff should have access to discovery to identify a new class representative after her standing to sue was challenged.

- ***Consumer Privacy Cases***, 175 Cal. App. 4th 545 (2009). The California Court of Appeal rejected objections to a nationwide class action settlement benefiting Bank of America customers.

- ***Koponen v. Pac. Gas & Elec. Co.***, 165 Cal. App. 4th 345 (2008). The Firm's attorneys obtained a published decision reversing the trial court's dismissal of the action, and holding that the plaintiff's claims for damages arising from the utility's unauthorized use of rights-of-way or easements obtained from the plaintiff and other landowners were not barred by a statute limiting the authority of California courts to review or correct decisions of the California Public Utilities Commission.

- ***Sanford v. MemberWorks, Inc.***, 483 F.3d 956 (9th Cir. 2007). In a telemarketing-fraud case, where the plaintiff consumer insisted she had never entered the contractual arrangement that defendants said bound her to arbitrate individual claims to the exclusion of pursuing class claims, the Ninth Circuit reversed an order compelling arbitration – allowing the plaintiff to litigate on behalf of a class.

- ***Ritt v. Billy Blanks Enters.***, 870 N.E.2d 212 (Ohio Ct. App. 2007). In the Ohio analog to the *West* case, the Ohio Court of Appeals approved certification of a class of Ohio residents seeking relief under Ohio's consumer protection laws for the same telemarketing fraud.

- ***Haw. Med. Ass'n v. Haw. Med. Serv. Ass'n***, 148 P.3d 1179 (Haw. 2006). The Supreme Court of Hawaii ruled that claims of unfair competition were not subject to arbitration and that claims of tortious interference with prospective economic advantage were adequately alleged.

- ***Branick v. Downey Sav. & Loan Ass'n***, 39 Cal. 4th 235 (2006). Robbins Geller attorneys were part of a team of lawyers that briefed this case before the Supreme Court of California. The court issued a unanimous decision holding that new plaintiffs may be substituted, if necessary, to preserve actions pending when Proposition 64 was passed by California voters in 2004. Proposition 64 amended California's Unfair Competition Law and was aggressively cited by defense lawyers in an effort to dismiss cases after the initiative was adopted.

- ***McKell v. Wash. Mut., Inc.***, 142 Cal. App. 4th 1457 (2006). The California Court of Appeal reversed the trial court, holding that plaintiff's theories attacking a variety of allegedly inflated mortgage-related fees were actionable.

- ***West Corp. v. Superior Court***, 116 Cal. App. 4th 1167 (2004). The California Court of Appeal upheld the trial court's finding that jurisdiction in California was appropriate over the out-of-state corporate defendant whose telemarketing was aimed at California residents. Exercise of jurisdiction was found to be in keeping with considerations of fair play and substantial justice.

- ***Kruse v. Wells Fargo Home Mortg., Inc.***, 383 F.3d 49 (2d Cir. 2004), and ***Santiago v. GMAC Mortg. Grp., Inc.***, 417 F.3d 384 (3d Cir. 2005). In two groundbreaking federal appellate decisions, the Second and Third Circuits each ruled that the Real Estate Settlement Practices Act prohibits marking up home loan-related fees and charges.

Insurance

- ***Smith v. Am. Family Mut. Ins. Co.***, 289 S.W.3d 675 (Mo. Ct. App. 2009). Capping nearly a decade of hotly contested litigation, the Missouri Court of Appeals reversed the trial court's judgment notwithstanding the verdict for auto insurer American Family and reinstated a unanimous jury verdict for the plaintiff class.

- ***Troyk v. Farmers Grp., Inc.***, 171 Cal. App. 4th 1305 (2009). The California Court of Appeal held that Farmers Insurance's practice of levying a "service charge" on one-month auto insurance policies, without specifying the charge in the policy, violated California's Insurance Code.

- ***Lebrilla v. Farmers Grp., Inc.***, 119 Cal. App. 4th 1070 (2004). Reversing the trial court, the California Court of Appeal ordered class certification of a suit against Farmers, one of the largest automobile insurers in California, and ruled that Farmers' standard automobile policy requires it to provide parts that are as good as those made by vehicle's manufacturer. The case involved Farmers' practice of using inferior imitation parts when repairing insureds' vehicles.

- ***In re Monumental Life Ins. Co.***, 365 F.3d 408, 416 (5th Cir. 2004). The Fifth Circuit Court of Appeals reversed a district court's denial of class certification in a case filed by African-Americans seeking to remedy racially discriminatory insurance practices. The Fifth Circuit held that a monetary relief claim is viable in a Rule 23(b)(2) class if it flows directly from liability to the class as a whole and is capable of classwide "'computation by means of objective standards and not dependent in any significant way on the intangible, subjective differences of each class member's circumstances.'"

Attorney Biographies

Mario Alba Jr. | Partner

Mario Alba is a partner in the Firm's Melville office. He has served as lead counsel in numerous cases and is responsible for initiating, investigating, researching, and filing securities and consumer fraud class actions. He has recovered millions of dollars in numerous actions, including cases against NBTY, Inc. ($16 million), OSI Pharmaceuticals ($9 million recovery) and PXRe Group, Ltd. ($5.9 million). Alba is also a member of the Firm's Institutional Outreach Team, which provides advice to the Firm's institutional clients, including numerous public pension systems and Taft-Hartley funds throughout the United States, and consults with them on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Some of Alba's institutional clients are currently involved in cases involving Microsoft Corp., Endo International PLC, L-3 Communications Holdings, Inc., Iconix Brand Group and BHP Billiton Limited. Alba has lectured at institutional investor conferences throughout the United States on various shareholder issues, including at the Illinois Public Pension Fund Association, the New York State Teamsters Conference, the American Alliance Conference, and the TEXPERS/IPPFA Joint Conference at the New York Stock Exchange, among others.

Education

B.S., St. John's University, 1999; J.D., Hofstra University School of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2012-2013, 2016; B.S., Dean's List, St. John's University, 1999; Selected as participant in Hofstra Moot Court Seminar, Hofstra University School of Law

Susan K. Alexander | Partner

Suzi Alexander is a partner in the Firm's San Francisco office. Her practice specializes in federal appeals of securities fraud class actions on behalf of investors. With nearly 30 years of federal appellate experience, she has argued on behalf of defrauded investors in circuit courts throughout the United States. Among her most notable cases are *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery), which is one of the largest securities class action settlements ever achieved in the Northern District of California, and the successful appellate ruling in *Alaska Elec. Pension Fund v. Flowserve Corp.* ($55 million recovery). Other representative results include: *Carpenters Pension Tr. Fund of St. Louis v. Barclays PLC*, 750 F.3d 227 (2d Cir. 2014) (reversing dismissal of securities fraud complaint, focused on loss causation); *Panther Partners Inc. v. Ikanos Commc'ns, Inc.*, 681 F.3d 114 (2d Cir. 2012) (reversing dismissal of §11 claim); *City of Pontiac Gen. Emps. Ret. Sys. v. MBIA, Inc.*, 637 F.3d 169 (2d Cir. 2011) (reversing dismissal of securities fraud complaint, focused on statute of limitations*); In re Gilead Scis. Sec. Litig.*, 536 F.3d 1049 (9th Cir. 2008) (reversing dismissal of securities fraud complaint, focused on loss causation); and *Barrie v. Intervoice-Brite, Inc.*, 397 F.3d 249 (5th Cir. 2005) (reversing dismissal of securities fraud complaint, focused on scienter). Alexander's prior appellate work was with the California Appellate Project ("CAP"), where she prepared appeals and petitions for writs of *habeas corpus* on behalf of individuals sentenced to death. At CAP, and subsequently in private practice, she litigated and consulted on death penalty direct and collateral appeals for ten years.

Education

B.A., Stanford University, 1983; J.D., University of California, Los Angeles, 1986

Honors / Awards

Super Lawyer, 2015-2016; American Academy of Appellate Lawyers; California Academy of Appellate Lawyers; Ninth Circuit Advisory Rules Committee; Appellate Delegate, Ninth Circuit Judicial Conference; ABA Council of Appellate Lawyers

Jason H. Alperstein | Partner

Jason Alperstein is a partner in the Firm's Boca Raton office. He focuses his practice in the areas of class action, consumer fraud and securities litigation, and is admitted to the bars of both Florida and New York. Alperstein is an integral member of the *In re Volkswagen "Clean Diesel" Marketing, Sales Practices, & Prods. Liab. Litig.* (N.D. Cal.) litigation team, prosecuting claims on behalf of almost 600,000 consumers who were duped into purchasing and leasing Volkswagen, Audi and Porsche vehicles that were marketed as environmentally friendly, yet spewed toxic pollutants up to 40 times the legal limit permitted by the EPA. Working closely with named partner Paul J. Geller, who was selected by Judge Charles R. Breyer to serve as a member of the Plaintiffs' Steering Committee, Alperstein has been involved in almost all aspects of the litigation. The settlement pertaining to the 2.0-liter vehicles at issue, in combination with the related government settlements, is valued at over $17 billion and represents arguably the largest consumer class action settlement in U.S. history. He is also actively involved in a number of nationwide class actions currently pending throughout the country, including *In re National Hockey League Players' Concussion Injury Litig.* (D. Minn.), involving the NHL's failure to warn players of the risk of long-term neurological damages from repetitive head trauma, and *Evans v. Arizona Cardinals Football Club, LLC* (N.D. Cal.), involving the conspiracy of the NFL and its Clubs to violate federal drug laws to ensure that injured players returned to play as soon as possible.

Alperstein has also served on lead and co-lead litigation teams in nationwide and statewide class action lawsuits against dozens of the largest banking institutions in connection with the unlawful assessment of checking account overdraft fees. His efforts resulted in over $250 million in settlements for his clients and significant changes in the way banks charge overdraft fees to their customers. In addition, he has led consumer class actions against national banks for illegal payday lending, consumer product manufacturers for false and deceptive labeling, and some of the world's largest clothing retailers for their use of false and deceptive comparative pricing in their outlet stores.

Education

B.A., Brown University, 2004; M.B.A., University of Miami School of Business, 2008, J.D., University of Miami School of Law, 2008

Honors / Awards

Super Lawyer "Rising Star," 2014-2016; J.D., *Cum Laude*, University of Miami School of Law, 2008

Matthew I. Alpert | Partner

Matthew Alpert is a partner in the Firm's San Diego office and focuses on the prosecution of securities fraud litigation. He has helped recover over $800 million for individual and institutional investors financially harmed by corporate fraud. Alpert's current cases include securities fraud cases against Microsoft (W.D. Wash.), Marvell Technology (N.D. Cal.), Diplomat Pharmacy (E.D. Mich.), Valeant (D.N.J.), Santander Consumer USA (N.D. Tex.) and Banc of California (C.D. Cal.). Alpert is part of the litigation team that successfully obtained class certification in a securities fraud class action against Regions Financial, a class certification decision which was substantively affirmed by the United States Court of Appeals for the Eleventh Circuit in *Local 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.*, 762 F.3d 1248 (11th Cir. 2014). Upon remand, the United States District Court for the Northern District of Alabama granted class certification again, rejecting defendants' post-*Halliburton II* arguments concerning stock price impact.

Education

B.A., University of Wisconsin at Madison, 2001; J.D., Washington University, St. Louis, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2017

Darryl J. Alvarado | Partner

Darryl Alvarado is a partner in the Firm's San Diego office. Alvarado focuses his practice on securities fraud and other complex civil litigation. Alvarado helped secure $388 million for investors in J.P. Morgan RMBS in *Fort Worth Emps.' Ret. Fund v. J.P. Morgan Chase & Co.* That settlement is, on a percentage basis, the largest recovery ever achieved in an RMBS class action. He was also a member of a team of attorneys that secured $95 million for investors in Morgan Stanley-issued RMBS in *In re Morgan Stanley Mortgage Pass-Through Certificates Litig.* In addition, Alvarado was a member of a team of lawyers that obtained landmark settlements, on the eve of trial, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles in *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Incorporated* and *King County, Washington v. IKB Deutsche Industriebank AG*. He was integral in obtaining several precedent-setting decisions in those cases, including defeating the rating agencies' historic First Amendment defense and defeating the ratings agencies' motions for summary judgment concerning the actionability of credit ratings.

Education

B.A., University of California, Santa Barbara, 2004; J.D., University of San Diego School of Law, 2007

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2011

X. Jay Alvarez | Partner

Jay Alvarez is a partner in the Firm's San Diego office. He focuses his practice on securities fraud litigation and other complex litigation. Alvarez's notable cases include *In re Qwest Commc'ns Int'l, Inc. Sec. Litig.* ($400 million recovery), *In re Coca-Cola Sec. Litig.* ($137.5 million settlement), *In re St. Jude Medical, Inc. Sec. Litig.* ($50 million settlement) and *In re Cooper Cos. Sec. Litig.* ($27 million recovery). Most recently, Alvarez was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members will be eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Prior to joining the Firm, Alvarez served as an Assistant United States Attorney for the Southern District of California from 1991-2003. As an Assistant United States Attorney, he obtained extensive trial experience, including the prosecution of bank fraud, money laundering and complex narcotics conspiracy cases. During his tenure as an Assistant United States Attorney, Alvarez also briefed and argued numerous appeals before the Ninth Circuit Court of Appeals.

Education

B.A., University of California, Berkeley, 1984; J.D., University of California, Berkeley, Boalt Hall School of Law, 1987

Stephen R. Astley | Partner

Stephen Astley is a partner in the Firm's Boca Raton office. Astley devotes his practice to representing institutional and individual shareholders in their pursuit to recover investment losses caused by fraud. He has been lead counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for his clients and investors. He was on the trial team that recovered $60 million on behalf of investors in *City of Sterling Heights Gen. Emps.' Ret. Sys. v. Hospira, Inc.* Other notable representations include: *In re Red Hat, Inc. Sec. Litig.* (E.D.N.C.) ($20 million settlement); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps.' Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Prior to joining the Firm, Astley was with the Miami office of Hunton & Williams, where he concentrated his practice on class action defense, including securities class actions and white collar criminal defense. Additionally, he represented numerous corporate clients accused of engaging in unfair and deceptive practices. Astley was also an active duty member of the United States Navy's Judge Advocate General's Corps where he was the Senior Defense Counsel for the Naval Legal Service Office Pearl Harbor Detachment. In that capacity, Astley oversaw trial operations for the Detachment and gained substantial first-chair trial experience as the lead defense counsel in over 75 courts-martial and administrative proceedings. Additionally, from 2002-2003, Astley clerked for the Honorable Peter T. Fay, U.S. Court of Appeals for the Eleventh Circuit.

Education

B.S., Florida State University, 1992; M. Acc., University of Hawaii at Manoa, 2001; J.D., University of Miami School of Law, 1997

Honors / Awards

J.D., *Cum Laude*, University of Miami School of Law, 1997; United States Navy Judge Advocate General's Corps., Lieutenant

A. Rick Atwood, Jr. | Partner

Rick Atwood is a partner in the Firm's San Diego office. As a recipient of the California Lawyer Attorney of the Year ("CLAY") Award for his work on behalf of shareholders, he has successfully represented shareholders in securities class actions, merger-related class actions, and shareholder derivative suits in federal and state courts in more than 30 jurisdictions. Through his litigation efforts at both the trial and appellate levels, Atwood has helped recover billions of dollars for public shareholders, including the largest post-merger common fund recoveries on record.

Most recently, in *In re Dole Food Co., Inc. Stockholder Litig.*, which went to trial in the Delaware Court of Chancery on claims of breach of fiduciary duty on behalf of Dole Food Co., Inc. shareholders, Atwood helped obtain $148 million, the largest trial verdict ever in a class action challenging a merger transaction. He was also a key member of the litigation team in *In re Kinder Morgan, Inc. S'holders Litig.*, where he helped obtained an unprecedented $200 million common fund for former Kinder Morgan shareholders, the largest merger & acquisition class action recovery in history.

Atwood also led the litigation team that obtained an $89.4 million recovery for shareholders in *In re Del Monte Foods Co. S'holders Litig.*, after which the Delaware Court of Chancery stated that "it was only through the effective use of discovery that the plaintiffs were able to 'disturb[ ] the patina of normalcy surrounding the transaction.'" The court further commented that "Lead Counsel engaged in hard-nosed discovery to penetrate and expose problems with practices that Wall Street considered 'typical.'" One Wall Street banker even wrote in *The Wall Street Journal* that "'Everybody does it, but Barclays is the one that got caught with their hand in the cookie jar . . . . Now everybody has to rethink how we conduct ourselves in financing situations.'" Atwood's other significant opinions include *Brown v. Brewer* ($45 million recovery) and *In re Prime Hospitality, Inc. S'holders Litig.* ($25 million recovery).

Education

B.A., University of Tennessee, Knoxville, 1987; B.A., Katholieke Universiteit Leuven, Belgium, 1988; J.D., Vanderbilt School of Law, 1991

Honors / Awards

M&A Litigation Attorney of the Year in California, *Corporate International*, 2015; Super Lawyer, 2014-2017; Attorney of the Year, *California Lawyer*, 2012; B.A., Great Distinction, Katholieke Universiteit Leuven, Belgium, 1988; B.A., Honors, University of Tennessee, Knoxville, 1987; Authorities Editor, *Vanderbilt Journal of Transnational Law*, 1991

Aelish M. Baig | Partner

Aelish Marie Baig is a partner in the Firm's San Francisco office. She specializes in federal securities and consumer class actions. She focuses primarily on securities fraud litigation on behalf of individual and institutional investors, including state and municipal pension funds, Taft-Hartley funds, and private retirement and investment funds. Baig has litigated a number of cases through jury trial, resulting in multi-million dollar awards and settlements for her clients and has prosecuted securities fraud, consumer and derivative actions obtaining millions of dollars in recoveries against corporations such as Wells Fargo, Verizon, Celera, Pall and Prudential.

Baig prosecuted an action against Wells Fargo's directors and officers accusing the giant of engaging in robosigning foreclosure papers so as to mass-process home foreclosures, a practice which contributed significantly to the 2008-2009 financial crisis. The resulting settlement was worth more than $67 million in cash, corporate preventative measures and new lending initiatives for residents of cities devastated by Wells Fargo's alleged unlawful foreclosure practices. Baig was part of the litigation and trial team in *White v. Cellco Partnership d/b/a Verizon Wireless*, which resulted in a $25 million settlement and Verizon's agreement to an injunction restricting its ability to impose early termination fees in future subscriber agreements. She was also part of the team that prosecuted dozens of stock option backdating actions, securing tens of millions of dollars in cash recoveries as well as the implementation of comprehensive corporate governance enhancements for numerous companies victimized by their directors' and officers' fraudulent stock option backdating practices. Additionally, Baig prosecuted an action against Prudential Insurance for its alleged failure to pay life insurance benefits to beneficiaries of policyholders it knew or had reason to know had died, resulting in a settlement in excess of $30 million.

Education

B.A., Brown University, 1992; J.D., Washington College of Law at American University, 1998

Honors / Awards

Super Lawyer, 2012-2013; J.D., *Cum Laude*, Washington College of Law at American University, 1998; Senior Editor, *Administrative Law Review*, Washington College of Law at American University

Randall J. Baron | Partner

Randy Baron is a partner in the Firm's San Diego office. He specializes in securities litigation, corporate takeover litigation and breach of fiduciary duty actions. For almost two decades, Baron has headed up a team of lawyers whose accomplishments include obtaining instrumental rulings both at injunction and trial phases, establishing liability of financial advisors and investment banks. With an in-depth understanding of merger and acquisition and breach of fiduciary duty law, an ability to work under extreme time pressures, and the experience and willingness to take a case through trial, he has been responsible for recovering more than a billion dollars for shareholders. Notable achievements over the years include: *In re Kinder Morgan, Inc. S'holders Litig.* (Kan. Dist. Ct., Shawnee Cty.) ($200 million common fund for former Kinder Morgan shareholders, the largest merger & acquisition class action recovery in history); *In re Dole Food Co., Inc. Stockholder Litig.* (Del. Ch.) (obtained $148 million, the largest trial verdict ever in a class action challenging a merger transaction); and *In re Rural/Metro Corp. Stockholders Litig.* (Del. Ch.) (Baron and co-counsel obtained nearly $110 million for shareholders against Royal Bank of Canada Capital Markets LLC). In *In re Del Monte Foods Co. S'holders Litig.* (Del. Ch.), he exposed the unseemly practice by investment bankers of participating on both sides of large merger and acquisition transactions and ultimately secured an $89 million settlement for shareholders of Del Monte. Baron was one of the lead attorneys representing about 75 public and private institutional investors that filed and settled individual actions in *In re WorldCom Sec. Litig.* (S.D.N.Y.), where more than $657 million was recovered, the largest opt-out (non-class) securities action in history. In *In re Dollar Gen. Corp. S'holder Litig.* (Tenn. Cir. Ct., Davidson Cty.), Baron was lead trial counsel and helped to secure a settlement of up to $57 million in a common fund shortly before trial, and in *Brown v. Brewer* (C.D. Cal.), he secured $45 million for shareholders of Intermix Corporation, relating to News Corp.'s acquisition of that company. Formerly, Baron served as a Deputy District Attorney from 1990-1997 in Los Angeles County.

Education

B.A., University of Colorado at Boulder, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Litigation Star, *Benchmark Litigation*, 2016-2017; Leading Lawyer in America, *Lawdragon*, 2011, 2017; Leading Lawyer, *The Legal 500*, 2015-2016; Super Lawyer, 2014-2016; Leading Lawyer, *Chambers USA*, 2016; Mergers & Acquisitions Trailblazer, *The National Law Journal*, 2015-2016; Litigator of the Week, *The American Lawyer*, October 16, 2014; Attorney of the Year, *California Lawyer*, 2012; Litigator of the Week, *The American Lawyer*, October 7, 2011; J.D., *Cum Laude*, University of San Diego School of Law, 1990

James E. Barz | Partner

James Barz is a partner at the Firm, manages the Firm's Chicago office, and is one of the co-leaders of the Firm's whistleblower practice. He is a former federal prosecutor and registered CPA with extensive experience in complex litigation. Barz has been lead counsel in approximately 20 jury trials and argued 9 appeals in the Seventh Circuit. He has been an adjunct professor at Northwestern University School of Law from 2008 to 2016, teaching courses on trial advocacy and class action litigation. Barz has focused on representing investors in securities fraud class actions that have resulted in recoveries of over $900 million, including: *HCA* ($215 million, M.D. Tenn.); *Motorola* ($200 million, N.D. Ill.); *Sprint* ($131 million, D. Kan.); *Psychiatric Solutions* ($65 million, M.D. Tenn.); Dana Corp. ($64 million, N.D. Ohio); and *Hospira* ($60 million, N.D. Ill.). He has been lead or co-lead trial counsel in several of these cases obtaining favorable settlements just days or weeks before trial and after obtaining denials of summary judgment. Barz is currently representing investors in securities fraud litigation against Valeant Pharmaceuticals Inc. (D.N.J.). Barz also has responsibilities for Firm training and professional responsibility matters.

Prior to joining the Firm, Barz was a partner at Mayer Brown LLP from 2006 to 2011 and an associate from 1998 to 2002. At Mayer Brown, he was active in their pro bono program where, in his first jury trial, he won an acquittal on all charges and, in his first appeal, he obtained the reversal of a decades-old conviction where the trial judge had solicited a bribe. From 2002 to 2006 he served as an Assistant United States Attorney in Chicago, trying cases and supervising investigations involving public corruption, financial frauds, tax offenses, money laundering, and drug and firearm offenses. He successfully obtained a conviction against every defendant who went to trial.

Education

B.B.A., Loyola University Chicago, School of Business Administration, 1995; J.D., Northwestern University School of Law, 1998

Honors / Awards

B.B.A., *Summa Cum Laude*, Loyola University Chicago, School of Business Administration, 1995; J.D., *Cum Laude*, Northwestern University School of Law, 1998

Nathan W. Bear | Partner

Nate Bear is a partner in the Firm's San Diego office. Bear advises institutional investors on a global basis. His clients include Taft-Hartley funds, public and multi-employer pension funds, fund managers, insurance companies and banks around the world. He counsels clients on securities fraud and corporate governance, and frequently speaks at conferences worldwide. He has recovered over $1 billion for investors, including *In re Cardinal Health, Inc. Sec. Litig.* ($600 million) and *Jones v. Pfizer Inc.* ($400 million). In addition to initiating securities fraud class actions in the United States, he possesses direct experience in potential group actions in the United Kingdom, settlements in the European Union under the Wet Collectieve Afwikkeling Massaschade (WCAM), the Dutch Collective Mass Claims Settlement Act, as well as representative actions in Germany utilizing the Kapitalanlegermusterverfahrensgesetz (KapMuG), the Capital Market Investors' Model Proceeding Act. In *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.*, Bear commenced a lawsuit resulting in the first major ruling upholding fraud allegations against the chief credit rating agencies. That ruling led to the filing of a similar case, *King County, Washington v. IKB Deutsche Industriebank AG*. These cases, arising from the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles, ultimately obtained landmark settlements – on the eve of trial – from the major credit rating agencies and Morgan Stanley. Bear maintained an active role in litigation at the heart of the worldwide financial crisis, and is currently pursuing banks over their manipulation of LIBOR, FOREX and other benchmark rates.

Education

B.A., University of California at Berkeley, 1998; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2011

Alexandra S. Bernay | Partner

Xan Bernay is a partner in the Firm's San Diego office, where she specializes in antitrust and unfair competition class-action litigation. She has also worked on some of the Firm's largest securities fraud class actions, including the *Enron* litigation, which recovered an unprecedented $7.2 billion for investors. Bernay's current practice focuses on the prosecution of antitrust and consumer fraud cases. In *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.* Bernay serves as co-lead counsel. That case, pending in the Eastern District of New York, is brought on behalf of millions of U.S. merchants against Visa and MasterCard and various card-issuing banks. She also represents merchants in *B & R Supermarket Inc. v. Visa, Inc.*, a case charging Visa, MasterCard, American Express and Discover with antitrust violations related to the implementation of a billion-dollar shift in liability for certain payment card transactions related to chip cards.

Additionally, Bernay is involved in antitrust cases on behalf of various generic drug purchasers who allege a wide-ranging scheme against major drug companies. She is also a member of the team in *In re Digital Music Antitrust Litig.*, pending in the Southern District of New York. In the past, Bernay was actively involved in the consumer action on behalf of bank customers who were overcharged for debit card transactions. That case, *In re Checking Account Overdraft Litig.*, resulted in more than $500 million in settlements with major banks that manipulated customers' debit transactions to maximize overdraft fees.

Education

B.A., Humboldt State University, 1997; J.D., University of San Diego School of Law, 2000

Honors / Awards

Litigator of the Week, *Global Competition Review*, October 1, 2014

Erin W. Boardman | Partner

Erin Boardman is a partner in the Firm's Melville office, where her practice focuses on representing individual and institutional investors in class actions brought pursuant to the federal securities laws. She has been involved in the prosecution of numerous securities class actions that have resulted in millions of dollars in recoveries for defrauded investors, including: *Medoff v. CVS Caremark Corp*. (D.R.I.) ($48 million recovery); *Construction Laborers Pension Trust of Greater St. Louis v. Autoliv Inc*. (S.D.N.Y.) ($22.5 million recovery); *In re Gildan Activewear Inc. Sec. Litig*. (S.D.N.Y.) (resolved as part of a $22.5 million global settlement); *In re L.G. Phillips LCD Co., Ltd., Sec. Litig*. (S.D.N.Y.) ($18 million recovery); *In re Giant Interactive Grp., Inc. Sec. Litig*. (S.D.N.Y.) ($13 million recovery); *In re Coventry HealthCare, Inc. Sec. Litig*. (D. Md.) ($10 million recovery); *Lenartz v. American Superconductor Corp*. (D. Mass.) ($10 million recovery); *Dudley v. Haub* (D.N.J.) ($9 million recovery); *Hildenbrand v. W Holding Co*. (D.P.R.) ($8.75 million recovery); *In re Doral Financial Corp. Sec. Litig*. (D.P.R.) ($7 million recovery); and *Van Dongen v. CNinsure Inc*. (S.D.N.Y.) ($6.625 million recovery). During law school, Boardman served as Associate Managing Editor of *the Journal of Corporate, Financial and Commercial Law* interned in the chambers of the Honorable Kiyo A. Matsumoto in the United States District Court for the Eastern District of New York, and represented individuals on a *pro bono* basis through the Workers' Rights Clinic.

Education

B.A., State University of New York at Binghamton, 2003; J.D., Brooklyn Law School, 2007

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; B.A., *Magna Cum Laude*, State University of New York at Binghamton, 2003

Douglas R. Britton | Partner

Doug Britton is a partner in the Firm's San Diego office. His practice focuses on securities fraud and corporate governance. Britton has been involved in settlements exceeding $1 billion and has secured significant corporate governance enhancements to improve corporate functioning. Notable achievements include *In re WorldCom, Inc. Sec. & "ERISA" Litig*., where he was one of the lead partners that represented a number of opt-out institutional investors and secured an unprecedented recovery of $651 million; *In re SureBeam Corp. Sec. Litig*., where he was the lead trial counsel and secured an impressive recovery of $32.75 million; and *In re Amazon.com, Inc. Sec. Litig*., where he was one of the lead attorneys securing a $27.5 million recovery for investors.

Education

B.B.A., Washburn University, 1991; J.D., Pepperdine University School of Law, 1996

Honors / Awards

J.D., *Cum Laude*, Pepperdine University School of Law, 1996

Luke O. Brooks | Partner

Luke Brooks is a partner in the Firm's securities litigation practice group in the San Diego office. He focuses primarily on securities fraud litigation on behalf of individual and institutional investors, including state and municipal pension funds, Taft-Hartley funds, and private retirement and investment funds. Brooks was on the trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases recently prosecuted by Brooks include *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.*, in which plaintiffs recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities, and a pair of cases – *Abu Dhabi Commercial Bank v. Morgan Stanley & Co. Inc.* ("Cheyne") and *King County, Washington, et al. v. IKB Deutsche Industriebank AG* ("Rhinebridge") – in which plaintiffs obtained a settlement, on the eve of trial in Cheyne, from the major credit rating agencies and Morgan Stanley arising out of the fraudulent ratings of bonds issued by the Cheyne and Rhinebridge structured investment vehicles.

Education

B.A., University of Massachusetts at Amherst, 1997; J.D., University of San Francisco, 2000

Honors / Awards

Local Litigation Star, *Benchmark Litigation*, 2017; Member, *University of San Francisco Law Review*, University of San Francisco

Andrew J. Brown | Partner

Andrew Brown is a partner in the Firm's San Diego office where his practice focuses on securities fraud, shareholder derivative and corporate governance litigation. He has worked on a variety of cases, recovering over $1 billion for investors and achieving precedent-setting changes in corporate practices. Brown's most notable cases include: *In re UnitedHealth Grp. Inc. PSLRA Litig.* ($895 million settlement); *Local 703, I.B. of T. Grocery & Food Emps. Welfare Fund v. Regions Fin. Corp.*, 762 F.3d 1248 (11th Cir. 2014) ($90 million settlement); *In re Questcor Sec. Litig.*, 2013 U.S. Dist. LEXIS 142865 (C.D. Cal. 2013) ($38 million settlement); *In re Constar Int'l Inc. Sec. Litig.* ($23.5 million settlement); and *Freidus v. Barclays Bank Plc,* 734 F.3d 132 (2d Cir. 2013). Prior to joining the Firm, Brown worked as a trial lawyer for the San Diego County Public Defender's Office. He later opened his own firm in San Diego, representing consumers and insureds in lawsuits against major insurance companies.

Education

B.A., University of Chicago, 1988; J.D., University of California, Hastings College of the Law, 1992

Spencer A. Burkholz | Partner

Spence Burkholz is a partner in the Firm's San Diego office and a member of the Firm's Executive and Management Committees. He has 21 years of experience in prosecuting securities class actions and private actions on behalf of large institutional investors. Burkholz was one of the lead trial attorneys in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Burkholz has also recovered billions of dollars for injured shareholders in cases such as *Enron* ($***7.2*** billion), *WorldCom* ($657 million), *Countrywide* ($500 million) and *Qwest* ($445 million). He is currently representing large institutional investors in actions involving the credit crisis.

Education

B.A., Clark University, 1985; J.D., University of Virginia School of Law, 1989

Honors / Awards

Local Litigation Star, *Benchmark Litigation*, 2015-2017; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Super Lawyer, 2015-2016; B.A., *Cum Laude*, Clark University, 1985; *Phi Beta Kappa*, Clark University, 1985

Joseph D. Daley | Partner

Joseph Daley is a partner in the Firm's San Diego office, serves on the Firm's Securities Hiring Committee, and is a member of the Firm's Appellate Practice Group. Precedents include: *DeJulius v. New Eng. Health Care Emps. Pension Fund*, 429 F.3d 935 (10th Cir. 2005); *Frank v. Dana Corp.* ("*Dana I*"), 547 F.3d 564 (6th Cir. 2008); *Frank v. Dana Corp.* ("*Dana II*"), 646 F.3d 954 (6th Cir. 2011*); Freidus v. Barclays Bank Plc*, 734 F.3d 132 (2d Cir. 2013); *In re HealthSouth Corp. Sec. Litig.*, 334 F. App'x 248 (11th Cir. 2009*); In re Merck & Co. Sec., Derivative & ERISA Litig.*, 493 F.3d 393 (3d Cir. 2007); *In re Qwest Commc'ns Int'l*, 450 F.3d 1179 (10th Cir. 2006); *Luther v. Countrywide Home Loans Servicing LP*, 533 F.3d 1031 (9th Cir. 2008); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, 693 F.3d 145 (2d Cir. 2012); *Rosenbloom v. Pyott* ("*Allergan*"), 765 F.3d 1137 (9th Cir. 2014); *Silverman v. Motorola Solutions, Inc.*, 739 F.3d 956 (7th Cir. 2013); *Siracusano v. Matrixx Initiatives, Inc.*, 585 F.3d 1167 (9th Cir. 2009), *aff'd*, 563 U.S. 27 (2011); and *Southland Sec. Corp. v. INSpire Ins. Solutions Inc.,* 365 F.3d 353 (5th Cir. 2004). Daley is admitted to practice before the U.S. Supreme Court, as well as before 12 U.S. Courts of Appeals around the nation.

Education

B.S., Jacksonville University, 1981; J.D., University of San Diego School of Law, 1996

Honors / Awards

Super Lawyer, 2011-2012, 2014-2017; Appellate Moot Court Board, Order of the Barristers, University of San Diego School of Law; Best Advocate Award (Traynore Constitutional Law Moot Court Competition), First Place and Best Briefs (Alumni Torts Moot Court Competition and USD Jessup International Law Moot Court Competition)

Patrick W. Daniels | Partner

Patrick Daniels is a founding and managing partner in the Firm's San Diego office. He is widely recognized as a leading corporate governance and investor advocate. The *Daily Journal*, the leading legal publisher in California, named him one of the 20 most influential lawyers in California under 40 years of age. Additionally, the Yale School of Management's Millstein Center for Corporate Governance and Performance awarded Daniels its "Rising Star of Corporate Governance" honor for his outstanding leadership in shareholder advocacy and activism. Daniels counsels private and state government pension funds, central banks and fund managers in the United States, Australia, United Arab Emirates, United Kingdom, the Netherlands, and other countries within the European Union on issues related to corporate fraud in the United States securities markets and on "best practices" in the corporate governance of publicly traded companies. Daniels has represented dozens of institutional investors in some of the largest and most significant shareholder actions, including *Enron*, *WorldCom*, *AOL Time Warner*, *BP*, *Pfizer*, *Countrywide*, *Petrobras* and *Volkswagen*, to name just a few. In the wake of the financial crisis, he represented dozens of investors in structured investment products in ground-breaking actions against the ratings agencies and Wall Street banks that packaged and sold supposedly highly rated shoddy securities to institutional investors all around the world.

Education

B.A., University of California, Berkeley, 1993; J.D., University of San Diego School of Law, 1997

Honors / Awards

One of the Most 20 Most Influential Lawyers in the State of California Under 40 Years of Age, *Daily Journal*; Rising Star of Corporate Governance, Yale School of Management's Milstein Center for Corporate Governance & Performance; B.A., *Cum Laude*, University of California, Berkeley, 1993

Stuart A. Davidson | Partner

Stuart Davidson is a partner in the Firm's Boca Raton office. His practice focuses on complex consumer class actions, including cases involving deceptive and unfair trade practices, privacy and data breach issues, as well as representing investors in class actions involving mergers and acquisitions, and prosecuting derivative lawsuits on behalf of public corporations. Since joining the Firm, Davidson has obtained multi-million dollar recoveries for consumers, healthcare providers and shareholders, including cases involving Aetna Health, Vista Healthplan, Fidelity Federal Bank & Trust, Winn-Dixie, and UnitedGlobalCom. He currently serves as co-lead counsel for hundreds of retired NHL players in *In re NHL Players' Concussion Injury Litigation* in the District of Minnesota, serves as co-lead counsel on behalf of over one thousand retired NFL players in *Evans v. Arizona Cardinals Football Club, LLC* in the Northern District of California regarding the illegal distribution of painkillers and other drugs to players, and is actively assisting the Plaintiffs' Steering Committee in *In re Volkswagen "Clean Diesel" Litigation* in the Northern District of California, a case involving Volkswagen's worldwide emissions cheating scandal.

Davidson is a former lead assistant public defender in the Felony Division of the Broward County, Florida Public Defender's Office. During his tenure at the Public Defender's Office, he tried over 30 jury trials, conducted hundreds of depositions, handled numerous evidentiary hearings, engaged in extensive motion practice, and defended individuals charged with major crimes ranging from third-degree felonies to life and capital felonies.

Education

B.A., State University of New York at Geneseo, 1993; J.D., Nova Southeastern University Shepard Broad Law Center, 1996

Honors / Awards

J.D., *Summa Cum Laude*, Nova Southeastern University Shepard Broad Law Center, 1996; Associate Editor, *Nova Law Review*, Book Awards in Trial Advocacy, Criminal Pretrial Practice and International Law

Jason C. Davis | Partner

Jason Davis is a partner in the Firm's San Francisco office where he practices securities class actions and complex litigation involving equities, fixed-income, synthetic and structured securities issued in public and private transactions. Davis was on the trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs.

Prior to joining the Firm, Davis focused on cross-border transactions, mergers and acquisitions at Cravath, Swaine and Moore LLP in New York.

Education

B.A., Syracuse University, 1998; J.D., University of California at Berkeley, Boalt Hall School of Law, 2002

Honors / Awards

B.A., *Summa Cum Laude*, Syracuse University, 1998; International Relations Scholar of the year, Syracuse University; Teaching fellow, examination awards, Moot court award, University of California at Berkeley, Boalt Hall School of Law

Mark J. Dearman | Partner

Mark Dearman is a partner in the Firm's Boca Raton office, where his practice focuses on consumer fraud, securities fraud, mass torts, antitrust, whistleblower and corporate takeover litigation. Dearman's recent representative cases include: *In re NHL Players' Concussion Injury Litig.*, 2015 U.S. Dist. LEXIS 38755 (D. Minn. 2015); *In re Sony Gaming Networks & Customer Data Sec. Breach Litig.*, 903 F. Supp. 2d 942 (S.D. Cal. 2012); *In re Volkswagen "Clean Diesel" Mktg. Sales Practice, & Prods. Liab. Litig.*, 2016 U.S. Dist. LEXIS 1357 (N.D. Cal. 2016); *In re Ford Fusion & C-Max Fuel Econ. Litig.*, 2015 U.S. Dist. LEXIS 155383 (S.D.N.Y. 2015); *Looper v. FCA US LLC*, No. 5:14-cv-00700 (C.D. Cal.); *In re Aluminum Warehousing Antitrust Litig.*, 95 F. Supp. 3d 419 (S.D.N.Y. 2015), *aff'd*, 833 F.3d 151 (2d Cir. 2016); *In re Liquid Aluminum Sulfate Antitrust Litig.*, No. 16-md-2687 (D.N.J.); *In re Winn-Dixie Stores, Inc. S'holder Litig.*, No. 16-2011-CA-010616 (Fla. 4th Jud. Cir. Ct., Duval Cty.); *Gemelas v. Dannon Co. Inc.*, No. 1:08-cv-00236 (N.D. Ohio); and *In re AuthenTec, Inc. S'holder Litig.*, No. 05-2012-CA-57589 (Fla. 18th Jud. Cir. Ct., Brevard Cty.). Prior to joining the Firm, he founded Dearman & Gerson, where he defended Fortune 500 companies, with an emphasis on complex commercial litigation, consumer claims, and mass torts (products liability and personal injury), and has obtained extensive jury trial experience throughout the United States. Having represented defendants for so many years before joining the Firm, Dearman has a unique perspective that enables him to represent clients effectively.

Education

B.A., University of Florida, 1990; J.D., Nova Southeastern University, 1993

Honors / Awards

AV rated by Martindale-Hubbell; Super Lawyer, 2014-2016; In top 1.5% of Florida Civil Trial Lawyers in *Florida Trend's* Florida Legal Elite, 2006, 2004

Travis E. Downs III | Partner

Travis Downs is a partner in the Firm's San Diego office. His areas of expertise include prosecution of shareholder and securities litigation, including complex shareholder derivative actions. Downs led a team of lawyers who successfully prosecuted over sixty-five stock option backdating derivative actions in federal and state courts across the country, resulting in hundreds of millions in financial givebacks for the plaintiffs and extensive corporate governance enhancements, including annual directors elections, majority voting for directors and shareholder nomination of directors. Notable cases include: *In re Community Health Sys., Inc. S'holder Derivative Litig.* ($60 million in financial relief and unprecedented corporate governance reforms); *In re Marvell Tech. Grp. Ltd. Derivative Litig.* ($54 million in financial relief and extensive corporate governance enhancements); *In re McAfee, Inc. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Affiliated Computer Servs. Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re KB Home S'holder Derivative Litig.* ($30 million in financial relief and extensive corporate governance enhancements); *In re Juniper Networks Derivative Litig.* ($22.7 million in financial relief and extensive corporate governance enhancements); and *In re Nvidia Corp. Derivative Litig.* ($15 million in financial relief and extensive corporate governance enhancements).

He was also part of the litigation team that obtained a $67 million settlement in *City of Westland Police & Fire Ret. Sys. v. Stumpf*, a shareholder derivative action alleging that Wells Fargo participated in the mass-processing of home foreclosure documents by engaging in widespread robo-signing, and a $250 million settlement in *In re Google, Inc. Derivative Litig.*, an action alleging that Google facilitated in the improper advertising of prescription drugs. Downs is a frequent speaker at conferences and seminars and has lectured on a variety of topics related to shareholder derivative and class action litigation.

Education

B.A., Whitworth University, 1985; J.D., University of Washington School of Law, 1990

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Board of Trustees, Whitworth University; Super Lawyer, 2008; B.A., Honors, Whitworth University, 1985

Daniel S. Drosman | Partner

Dan Drosman is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He focuses his practice on securities fraud and other complex civil litigation and has obtained significant recoveries for investors in cases such as *Morgan Stanley*, *Cisco Systems*, *Coca-Cola*, *Petco*, *PMI* and *America West*. Drosman served as one of the lead trial attorneys in *Jaffe v. Household Int'l, Inc.* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Drosman also led a group of attorneys prosecuting fraud claims against the credit rating agencies, where he was distinguished as one of the few plaintiffs' counsel to overcome the credit rating agencies' motions to dismiss.

Prior to joining the Firm, Drosman served as an Assistant District Attorney for the Manhattan District Attorney's Office, and an Assistant United States Attorney in the Southern District of California, where he investigated and prosecuted violations of the federal narcotics, immigration, and official corruption law.

Education

B.A., Reed College, 1990; J.D., Harvard Law School, 1993

Honors / Awards

Super Lawyer, 2017; Department of Justice Special Achievement Award, Sustained Superior Performance of Duty; B.A., Honors, Reed College, 1990; *Phi Beta Kappa*, Reed College, 1990

Thomas E. Egler | Partner

Thomas Egler is a partner in the Firm's San Diego office and focuses his practice on the prosecution of securities class actions on behalf of defrauded shareholders. He is responsible for prosecuting securities fraud class actions and has obtained recoveries for investors in litigation involving WorldCom ($657 million), AOL Time Warner ($629 million), and Qwest ($445 million), as well as dozens of other actions. Prior to joining the Firm, Egler was a law clerk to the Honorable Donald E. Ziegler, Chief Judge, United States District Court, Western District of Pennsylvania.

Education

B.A., Northwestern University, 1989; J.D., The Catholic University of America, Columbus School of Law, 1995

Honors / Awards

Super Lawyer, 2017; Associate Editor, *The Catholic University Law Review*

Jason A. Forge | Partner

Jason Forge is a partner in the Firm's San Diego office, specializing in complex investigations, litigation and trials. As a federal prosecutor and private practitioner, he has conducted dozens of jury and bench trials in federal and state courts, including the month-long trial of a defense contractor who conspired with Congressman Randy "Duke" Cunningham in the largest bribery scheme in congressional history.

Forge was a key member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. The result means individual class members will be eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis. He has also successfully defeated motions to dismiss against several prominent defendants, including the first securities fraud case against Wal-Mart Stores, Inc. and Scotts Miracle-Gro. In a case against another prominent defendant, Pfizer Inc., he led an investigation that uncovered key documents that Pfizer had not produced in discovery. Although fact discovery in the case had already closed, the district judge ruled that the documents had been improperly withheld, and ordered that discovery be reopened, including the reopening of the depositions of Pfizer's former CEO, CFO and General Counsel. Less than six months after completing these depositions, Pfizer settled the case for $400 million. Forge has also taught trial practice techniques on local and national levels, and has written and argued many state and federal appeals, including an en banc argument in the Ninth Circuit.

Education

B.B.A., The University of Michigan Ross School of Business, 1990; J.D., The University of Michigan Law School, 1993

Honors / Awards

Two-time recipient of one of Department of Justice's highest awards: Director's Award for Superior Performance by Litigation Team; numerous commendations from Federal Bureau of Investigation (including commendation from FBI Director Robert Mueller III), Internal Revenue Service, and Defense Criminal Investigative Service; J.D., *Magna Cum Laude*, Order of the Coif, The University of Michigan Law School, 1993; B.B.A., High Distinction, The University of Michigan Ross School of Business, 1990

Paul J. Geller | Partner

Paul Geller, Managing Partner of the Boca Raton, Florida office, is a Founding Partner of the Firm, a member of its Executive and Management Committees and head of the Firm's Consumer Practice Group. Geller's 23 years of litigation experience is broad, and he has handled cases in each of the Firm's practice areas. Notably, before devoting his practice to the representation of consumers and investors, he defended companies in high-stakes class action litigation, providing him an invaluable perspective. Geller has tried bench and jury trials on both the plaintiffs' and defendants' sides, and has argued before numerous state, federal and appellate courts throughout the country.

Geller was selected to serve in a leadership position on behalf of consumers in the massive Volkswagen "Clean Diesel" Emissions case. This notable appointment came after a record-setting application process in which over 150 attorneys sought the court's designation as a member of the plaintiffs' Steering Committee. Along with the committee and government agencies, Geller reached a $14.7 billion settlement (which includes $2.7 billion for environmental remediation), plus a $1.6 billion settlement with dealers, for a total of over $17 billion for affected consumers. Other noteworthy recent successes include a $265 million recovery against Massey Energy in *In re Massey Energy Co. Sec. Litig.*, in which Massey was found accountable for a tragic explosion at the Upper Big Branch mine in Raleigh County, West Virginia. Geller also secured a $146.25 million recovery against Duke Energy in *Nieman v. Duke Energy Corp.*, the largest recovery in North Carolina for a case involving securities fraud, and one of the five largest recoveries in the Fourth Circuit. Additionally, Geller was the lead counsel in *Kehoe v. Fidelity Fed. Bank & Tr.*, one of the country's first cases alleging a class-wide privacy violation, settling the case for a $50 million recovery in addition to enhanced privacy protections. More recently, he was one of the lead counsel in the Sony Gaming Networks Data Breach litigation, which resulted in significant monetary recovery and other benefits to class members. Geller was also instrumental in resolving a case against Dannon for falsely advertising the health benefits of yogurt products.

Education

B.S., University of Florida, 1990; J.D., Emory University School of Law, 1993

Honors / Awards

Rated AV by Martindale-Hubbell; Fellow, Litigation Counsel of America (LCA) Proven Trial Lawyers; Best Lawyer in America*, Best Lawyers®*, 2017; Attorney of the Month, *Attorney At Law*, 2017; Leading Lawyer in America, *Lawdragon*, 2006-2007, 2009-2017; Featured in "Lawyer Limelight" series, *Lawdragon*, 2017; Super Lawyer, 2007-2016; Top Rated Lawyer, South Florida's Legal Leaders, *Miami Herald*, 2015; Litigation Star, *Benchmark Litigation*, 2013; "Legal Elite," *Florida Trend Magazine*; One of "Florida's Most Effective Lawyers," *American Law Media*, One of Florida's top lawyers in *South Florida Business* Journal, One of the Nation's Top "40 Under 40," *The National Law Journal*; One of Florida's Top Lawyers, *Law & Politics*; Editor, *Emory Law Journal*; Order of the Coif, Emory University School of Law

Jonah H. Goldstein | Partner

Jonah Goldstein is a partner in the Firm's San Diego office and responsible for prosecuting complex securities cases and obtaining recoveries for investors. He also represents corporate whistleblowers who report violations of the securities laws. Goldstein has achieved significant settlements on behalf of investors including in *In re HealthSouth Sec. Litig.* (over $670 million recovered against HealthSouth, UBS and Ernst & Young) and *In re Cisco Sec. Litig.* (approximately $100 million). He also served on the Firm's trial team in *In re AT&T Corp. Sec. Litig.*, which settled after two weeks of trial for $100 million. Prior to joining the Firm, Goldstein served as a law clerk for the Honorable William H. Erickson on the Colorado Supreme Court and as an Assistant United States Attorney for the Southern District of California, where he tried numerous cases and briefed and argued appeals before the Ninth Circuit Court of Appeals.

Education

B.A., Duke University, 1991; J.D., University of Denver College of Law, 1995

Honors / Awards

Comments Editor, *University of Denver Law Review*, University of Denver College of Law

Benny C. Goodman III | Partner

Benny Goodman is a partner in the Firm's San Diego office. He primarily represents plaintiffs in shareholder actions on behalf of aggrieved corporations. Goodman has recovered hundreds of millions of dollars in shareholder derivative actions pending in state and federal courts across the nation. Most recently, he led a team of lawyers in litigation brought on behalf of Community Health Systems, Inc., resulting in a $60 million payment to the company, the largest recovery in a shareholder derivative action in Tennessee and the Sixth Circuit, as well as best in class value enhancing corporate governance reforms that included two shareholder nominated directors to the Community Health Board of Directors.

Similarly, Goodman recovered a $25 million payment to Lumber Liquidators and numerous corporate governance reforms, including a shareholder nominated director, in *In re Lumber Liquidators Holdings, Inc. S'holder Derivative Litig.* In *In re Google Inc. S'holder Derivative Litig.*, Goodman achieved groundbreaking corporate governance reforms designed to mitigate regulatory and legal compliance risk associated with online pharmaceutical advertising, including among other things, the creation of a $250 million fund to help combat rogue pharmacies from improperly selling drugs online.

Education

B.S., Arizona State University, 1994; J.D., University of San Diego School of Law, 2000

Elise J. Grace | Partner

Elise Grace is a partner in the San Diego office and responsible for advising the Firm's state and government pension fund clients on issues related to securities fraud and corporate governance. Grace serves as the Editor-in-Chief of the Firm's Corporate Governance Bulletin and is a frequent lecturer on securities fraud, shareholder litigation, and options for institutional investors seeking to recover losses caused by securities and accounting fraud. She has prosecuted various significant securities fraud class actions, including the *AOL Time Warner* state and federal securities opt-out litigations, which resulted in a combined settlement of $629 million for defrauded shareholders. Prior to joining the Firm, Grace was an associate at Brobeck Phleger & Harrison LLP and Clifford Chance LLP, where she defended various Fortune 500 companies in securities class actions and complex business litigation.

Education

B.A., University of California, Los Angeles, 1993; J.D., Pepperdine School of Law, 1999

Honors / Awards

J.D., *Magna Cum Laude*, Pepperdine School of Law, 1999; AMJUR American Jurisprudence Awards - Conflict of Laws; Remedies; Moot Court Oral Advocacy; Dean's Academic Scholarship, Pepperdine School of Law; B.A., *Summa Cum Laude*, University of California, Los Angeles, 1993; B.A., *Phi Beta Kappa*, University of California, Los Angeles, 1993

John K. Grant | Partner

John Grant is a partner in the Firm's San Francisco office where he devotes his practice to representing investors in securities fraud class actions. Grant has been lead or co-lead counsel in numerous securities actions and recovered tens of millions of dollars for shareholders. His cases include: *In re Micron Tech, Inc. Sec. Litig.* ($42 million recovery); *Perera v. Chiron Corp.* ($40 million recovery); *King v. CBT Grp.*, *PLC* ($32 million recovery); and *In re Exodus Commc'ns, Inc. Sec. Litig.* ($5 million recovery).

Education

B.A., Brigham Young University, 1988; J.D., University of Texas at Austin, 1990

Tor Gronborg | Partner

Tor Gronborg is a partner in the Firm's San Diego office and a member of the Firm's Management Committee. He often lectures on topics such as the Federal Rules of Civil Procedure and electronic discovery. Gronborg has served as lead or co-lead counsel in numerous securities fraud cases that have collectively recovered nearly $2 billion for investors. Gronborg's work has included significant recoveries against corporations such as Cardinal Health ($600 million), Motorola ($200 million), Duke Energy ($146.25 million), Sprint Nextel Corp. ($131 million), Prison Realty ($104 million), CIT Group ($75 million), Wyeth ($67.5 million) and Intercept Pharmaceuticals ($55 million). On three separate occasions, his pleadings have been upheld by the federal Courts of Appeals (*Broudo v. Dura Pharm., Inc.*, 339 F.3d 933 (9th Cir. 2003), *rev'd on other grounds*, 554 U.S. 336 (2005); *In re Daou Sys.*, 411 F.3d 1006 (9th Cir. 2005); *Staehr v. Hartford Fin. Servs. Grp.*, 547 F.3d 406 (2d Cir. 2008)), and he has been responsible for a number of significant rulings, including *In re Sanofi-Aventis Sec. Litig.*, 293 F.R.D. 449 (S.D.N.Y. 2013); *Silverman v. Motorola, Inc.*, 798 F. Supp. 2d 954 (N.D. Ill. 2011); *Roth v. Aon Corp.*, 2008 U.S. Dist. LEXIS 18471 (N.D. Ill. 2008); *In re Cardinal Health, Inc. Sec. Litigs.*, 426 F. Supp. 2d 688 (S.D. Ohio 2006); and *In re Dura Pharm., Inc. Sec. Litig.*, 452 F. Supp. 2d 1005 (S.D. Cal. 2006).

Education

B.A., University of California, Santa Barbara, 1991; Rotary International Scholar, University of Lancaster, U.K., 1992; J.D., University of California, Berkeley, 1995

Honors / Awards

Super Lawyer, 2013-2017; Moot Court Board Member, University of California, Berkeley; AFL-CIO history scholarship, University of California, Santa Barbara

Ellen Gusikoff Stewart | Partner

Ellen Gusikoff Stewart is a partner in the Firm's San Diego office. She currently practices in the Firm's settlement department, negotiating and documenting complex securities, merger, ERISA and derivative action settlements. Notable settlements include: *Landmen Partners Inc. v. The Blackstone Grp. L.P.* (S.D.N.Y. 2013) ($85 million); *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* (M.D. Tenn. 2015) ($65 million); *City of Sterling Heights Gen. Emps.' Ret. Sys v. Hospira, Inc.* (N.D. Ill. 2014) ($60 million); and *The Bd. of Trs. of the Operating Eng'rs Pension Tr. v. JPMorgan Chase Bank, N.A.* (S.D.N.Y. 2013) ($23 million).

Education

B.A., Muhlenberg College, 1986; J.D., Case Western Reserve University, 1989

Honors / Awards

Peer-Rated by Martindale-Hubbell

Robert Henssler | Partner

Bobby Henssler is a partner in the Firm's San Diego office, where he focuses his practice on securities fraud and other complex civil litigation. He has obtained significant recoveries for investors in cases such as *Enron*, *Blackstone* and *CIT Group*. Henssler is currently a key member of the team of attorneys prosecuting fraud claims against Goldman Sachs stemming from Goldman's conduct in subprime mortgage transactions (including "Abacus").

Most recently, Henssler served on the litigation team for *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery represents between 34% and 70% of the aggregate damages, far exceeding the typical recovery in a securities class action. He was also part of the litigation teams for *Landmen Partners Inc. v. The Blackstone Group L.P.* ($85 million recovery*); In re Novatel Wireless Sec. Litig.* ($16 million recovery); *Carpenters Pension Trust Fund of St. Louis v. Barclays PLC* ($14 million settlement); and *Kmiec v. Powerwave Technologies, Inc.* ($8.2 million settlement).

Education

B.A., University of New Hampshire, 1997; J.D., University of San Diego School of Law, 2001

Dennis J. Herman | Partner

Dennis Herman is a partner in the Firm's San Francisco office where he focuses his practice on securities class actions. He has led or been significantly involved in the prosecution of numerous securities fraud claims that have resulted in substantial recoveries for investors, including settled actions against Massey Energy ($265 million), Coca-Cola ($137 million), VeriSign ($78 million), Psychiatric Solutions, Inc. ($65 million), St. Jude Medical, Inc. ($50 million), NorthWestern ($40 million), BancorpSouth ($29.5 million), America Service Group ($15 million), Specialty Laboratories ($12 million), Stellent ($12 million) and Threshold Pharmaceuticals ($10 million).

Education

B.S., Syracuse University, 1982; J.D., Stanford Law School, 1992

Honors / Awards

Order of the Coif, Stanford Law School; Urban A. Sontheimer Award (graduating second in his class), Stanford Law School; Award-winning Investigative Newspaper Reporter and Editor in California and Connecticut

John Herman | Partner

John Herman is a partner at the Firm, the Chair of the Firm's Intellectual Property Practice and manages the Firm's Atlanta office. His practice focuses on complex civil litigation, with a particular emphasis on high technology matters. His experience includes securities, patent, antitrust, whistleblower and class action litigation. Herman also has significant first chair trial experience, handling numerous cases through verdict in both federal and state courts. Herman has worked on many noteworthy cases and successfully achieved favorable results for his clients. His notable cases include a recent derivative settlement of $60 million on behalf of Community Health Systems, as well as leading a team of attorneys enforcing the 3Com Ethernet patents, winning two jury trial victories in federal court. Herman also represented renowned inventor Ed Phillips in the landmark case *of Phillips v. AWH Corp.* He has represented the pioneers of mesh technology – David Petite, Edwin Brownrigg and SIPCO – in connection with their mesh technology portfolio. Herman has also worked on numerous class action cases, including acting as lead plaintiffs' counsel in the Home Depot shareholder derivative action, which achieved landmark corporate governance reforms for investors.

Education

B.S., Marquette University, 1988; J.D., Vanderbilt University Law School, 1992

Honors / Awards

Fellow, Litigation Counsel of America (LCA) Proven Trial Lawyers; Top Lawyers, *Atlanta Magazine*, 2017; Super Lawyer, 2005-2010, 2016-2017; Top 100 Georgia Super Lawyers list, 2007; One of "Georgia's Most Effective Lawyers," *Legal Trend*; John Wade Scholar, Vanderbilt University Law School; Editor-in-Chief, *Vanderbilt Journal*, Vanderbilt University Law School; B.S., *Summa Cum Laude*, Marquette University, 1988

Steven F. Hubachek | Partner

Steve Hubachek is a partner in the Firm's San Diego office. He is a member of the Firm's appellate group, where his practice concentrates on federal appeals. He has more than 25 years of appellate experience, has argued over 100 federal appeals, including 3 cases before the United States Supreme Court and 7 cases before en banc panels of the Ninth Circuit Court of Appeals. Prior to his work with the Firm, Hubachek joined Perkins Coie in Seattle, Washington, as an associate. He was admitted to the Washington State Bar in 1987 and was admitted to the California State Bar in 1990, practicing for many years with Federal Defenders of San Diego, Inc. He also had an active trial practice, including over 30 jury trials, and was Chief Appellate Attorney for Federal Defenders.

Education

B.A., University of California, Berkeley, 1983; J.D., Hastings College of the Law, 1987

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2014-2017; Assistant Federal Public Defender of the Year, National Federal Public Defenders Association, 2011; Appellate Attorney of the Year, San Diego Criminal Defense Bar Association, 2011 (co-recipient); President's Award for Outstanding Volunteer Service, Mid City Little League, San Diego, 2011; E. Stanley Conant Award for exceptional and unselfish devotion to protecting the rights of the indigent accused, 2009 (joint recipient); Super Lawyer, 2007-2009; *The Daily Transcript* Top Attorneys, 2007; AV rated by Martindale-Hubbell; J.D., *Cum Laude*, Order of the Coif, Thurston Honor Society, Hastings College of Law, 1987

James I. Jaconette | Partner

James Jaconette is one of the founding partners of the Firm and is located in its San Diego office. He manages cases in the Firm's securities class action and shareholder derivative litigation practices. He has served as one of the lead counsel in securities cases with recoveries to individual and institutional investors totaling over $8 billion. He also advises institutional investors, including hedge funds, pension funds and financial institutions. Landmark securities actions in which he contributed in a primary litigating role include *In re Informix Corp. Sec. Litig.*, and *In re Dynegy Inc. Sec. Litig.* and *In re Enron Corp. Sec. Litig.*, where he represented lead plaintiff The Regents of the University of California. Most recently, Jaconette was part of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery represents between 34% and 70% of the aggregate damages, far exceeding the typical recovery in a securities class action.

Education

B.A., San Diego State University, 1989; M.B.A., San Diego State University, 1992; J.D., University of California Hastings College of the Law, 1995

Honors / Awards

J.D., *Cum Laude*, University of California Hastings College of the Law, 1995; Associate Articles Editor, *Hastings Law Journal*, University of California Hastings College of the Law; B.A., with Honors and Distinction, San Diego State University, 1989

Rachel L. Jensen | Partner

Rachel Jensen is a partner in the Firm's San Diego office. Her practice focuses on consumer, antitrust and securities fraud class actions. Jensen has played a key role in recovering billions of dollars for individuals, government entities, and businesses injured by fraudulent schemes, anti-competitive conduct, and hazardous products placed in the stream of commerce.

Jensen was one of the lead attorneys who secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members will be eligible for upwards of $35,000 in restitution. She represented the class on a *pro bono* basis. She also represents car owners in the MDL litigation concerning the Volkswagen fraudulent emissions scandal, as well as litigation against Scotts Miracle-Gro, which has pled guilty to selling bird food as bird poison.

Among other recoveries, Jensen has played significant roles in the following cases: *In re Ins. Brokerage Antitrust Litig.* ($200 million recovered for policyholders who paid inflated premiums due to kickback scheme among major insurers and brokers); *In re Mattel, Inc., Toy Lead Paint Prods. Liab. Litig.* ($50 million in refunds and other relief for Mattel and Fisher-Price toys made in China with lead and dangerous magnets); *In re Nat'l Western Life Ins. Deferred Annuities Litig.* ($25 million in relief to senior citizens targeted for exorbitant deferred annuities that would not mature in their lifetime); *In re Checking Account Overdraft Litig.* ($500 million in settlements with major banks that manipulated customers' debit transactions to maximize overdraft fees); and *In re Groupon Mktg. & Sales Practices Litig.* ($8.5 million in refunds for consumers sold vouchers with illegal expiration dates). Prior to joining the Firm, Jensen was part of the litigation department at Morrison & Foerster in San Francisco, clerked for the Honorable Warren J. Ferguson of the Ninth Circuit Court of Appeals, worked abroad in Arusha, Tanzania as a law clerk in the Office of the Prosecutor at the International Criminal Tribunal for Rwanda (ICTR) and then worked at the International Criminal Tribunal for the Former Yugoslavia (ICTY), located in the Hague, Netherlands.

Education

B.A., Florida State University, 1997; University of Oxford, International Human Rights Law Program at New College, Summer 1998; J.D., Georgetown University Law School, 2000

Honors / Awards

Leading Lawyer in America, *Lawdragon*, 2017; Super Lawyer, 2016-2017; Super Lawyer "Rising Star," 2015; Nominated for 2011 Woman of the Year, *San Diego Magazine*; Editor-in-Chief, *First Annual Review of Gender and Sexuality Law*, Georgetown University Law School; Dean's List 1998-1999; B.A., *Cum Laude*, Florida State University's Honors Program, 1997; *Phi Beta Kappa*

Steven M. Jodlowski | Partner

Steven Jodlowski is a partner in the Firm's San Diego office. His practice focuses on high-stakes complex litigation, often involving antitrust, securities and consumer claims. In recent years, he has specialized in representing investors in a series of antitrust actions involving the manipulation of benchmark rates, including the ISDAFix Benchmark litigation, which to date has resulted in the recovery of nearly $400 million on behalf of investors, *In re Treasuries Sec. Auction Antitrust Litig.*, and *In re SSA Bonds Antitrust Litig*. Jodlowski was also part of the trial team in an antitrust monopolization case against a multinational computer and software company.

Jodlowski has successfully prosecuted numerous antitrust and RICO cases. These cases resulted in the recovery of more than $1 billion for investors and policyholders. Jodlowski has also represented institutional and individual shareholders in corporate takeover actions in state and federal court. He has handled pre- and post-merger litigation stemming from the acquisition of publicly listed companies in the biotechnology, oil and gas, information technology, specialty retail, electrical, banking, finance and real estate industries, among others.

Education

B.B.A., University of Central Oklahoma, 2002; J.D., California Western School of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; CAOC Consumer Attorney of the Year Award Finalist, 2015; J.D., *Cum Laude*, California Western School of Law, 2005

Peter M. Jones | Partner

Peter Jones is a partner in the Firm's Atlanta office. Though his practice primarily focuses on patent litigation, Jones has experience handling a wide range of complex litigation matters, including product liability actions and commercial disputes. Jones was part of the litigation team in *U.S. Ethernet Innovations, LLC v. Texas Instruments Incorporated*, in which he helped to enforce the 3Com Ethernet patents, winning two jury trial victories in federal court. Prior to joining the Firm, Jones practiced at King & Spalding LLP and clerked for the Honorable J.L. Edmondson, then Chief Judge of the United States Court of Appeals for the Eleventh Circuit.

Education

B.A., University of the South, 1999; J.D., University of Georgia School of Law, 2003

Honors / Awards

Super Lawyer "Rising Star," 2012-2013; Member, *Georgia Law Review*, Order of the Barristers, University of Georgia School of Law

Evan J. Kaufman | Partner

Evan Kaufman is a partner in the Firm's Melville office. He focuses his practice in the area of complex litigation in federal and state courts including securities, corporate mergers and acquisitions, derivative, and consumer fraud class actions. Kaufman has served as lead counsel or played a significant role in numerous actions, including *In re TD Banknorth S'holders Litig.* ($50 million recovery); *In re Gen. Elec. Co. ERISA Litig.* ($40 million cost to GE, including significant improvements to GE's employee retirement plan, and benefits to GE plan participants valued in excess of $100 million); Energy*Solutions*, Inc. Sec. Litig. ($26 million recovery); Lockheed Martin Corp. Sec. Litig. ($19.5 million recovery); *In re Warner Chilcott Ltd. Sec. Litig.* ($16.5 million recovery); *In re Giant Interactive Grp., Inc. Sec. Litig.* ($13 million recovery); *In re Royal Grp. Tech. Sec. Litig.* ($9 million recovery); Fidelity Ultra Short Bond Fund Litig. ($7.5 million recovery); *In re Audiovox Derivative Litig.* ($6.75 million recovery and corporate governance reforms); State Street Yield Plus Fund Litig. ($6.25 million recovery); *In re Merrill Lynch & Co., Inc., Internet Strategies Sec. Litig.* (resolved as part of a $39 million global settlement); and *In re MONY Grp., Inc. S'holder Litig.* (obtained preliminary injunction requiring disclosures in proxy statement).

Education

B.A., University of Michigan, 1992; J.D., Fordham University School of Law, 1995

Honors / Awards

Super Lawyer, 2013-2015; Member, *Fordham International Law Journal*, Fordham University School of Law

David A. Knotts | Partner

David Knotts is a partner in the Firm's San Diego office and, in addition to ongoing litigation work, is currently teaching a full-semester course on M&A litigation at the University of California Berkeley School of Law as a Lecturer. He focuses his practice on securities class action litigation in the context of mergers and acquisitions, representing both individual shareholders and institutional investors. Knotts has been counsel of record for shareholders on a number of significant recoveries in California state courts and in the Delaware Court of Chancery, including *In re Rural/Metro Corp. Stockholders Litig.* (nearly $110 million total recovery, affirmed by the Delaware Supreme Court in *RBC v. Jervis*), *In re Del Monte Foods Co. S'holders Litig*. ($89.4 million), *Websense* ($40 million), and *In re Onyx S'holders Litig.* ($30 million). Indeed, *Websense* and *Onyx* – both approved in late 2016 – are believed to be the largest post-merger class settlements in California state court history.

Prior to joining Robbins Geller, Knotts was an associate at one of the largest law firms in the world and represented corporate clients in various aspects of state and federal litigation, including major antitrust matters, trade secret disputes, unfair competition claims, and intellectual property litigation.

Education

B.S., University of Pittsburgh, 2001; J.D., Cornell Law School, 2004

Honors / Awards

Wiley W. Manuel Award for Pro Bono Legal Services, State Bar of California; Casa Cornelia Inns of Court; J.D., *Cum Laude*, Cornell Law School, 2004

Laurie L. Largent | Partner

Laurie Largent is a partner in the Firm's San Diego, California office. Her practice focuses on securities class action and shareholder derivative litigation and she has helped recover millions of dollars for injured shareholders. Largent was part of the litigation team that obtained a $265 million recovery in *In re Massey Energy Co. Sec. Litig.*, in which Massey was found accountable for a tragic explosion at the Upper Big Branch mine in Raleigh County, West Virginia. She also helped obtain $67.5 million for Wyeth shareholders in *City of Livonia Employees' Retirement System v. Wyeth, et al.*, settling claims that the defendants misled investors about the safety and commercial viability of one of the company's leading drug candidates. Most recently, Largent was on the team that secured a $64 million recovery for Dana Corp. shareholders in *Plumbers & Pipefitters National Pension Fund v. Burns*, in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action. She has been a board member on the San Diego County Bar Foundation and the San Diego Volunteer Lawyer Program since 2014. Largent has also served as an Adjunct Business Law Professor at Southwestern College in Chula Vista, California.

Education

B.B.A., University of Oklahoma, 1985; J.D., University of Tulsa, 1988

Honors / Awards

Board Member, San Diego County Bar Foundation, 2014-present; Board Member, San Diego Volunteer Lawyer Program, 2014-present

Arthur C. Leahy | Partner

Art Leahy is a founding partner in the Firm's San Diego office and a member of the Firm's Executive and Management Committees. He has nearly 20 years of experience successfully litigating securities actions and derivative cases. Leahy has recovered well over a billion dollars for the Firm's clients and has negotiated comprehensive pro-investor corporate governance reforms at several large public companies. Most recently, Leahy helped secure a $272 million recovery on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* In the *Goldman* Sachs case, he helped achieve favorable decisions in the Second Circuit Court of Appeals on behalf of investors of Goldman Sachs mortgage-backed securities and again in the Supreme Court, which denied Goldman Sachs' petition for certiorari, or review, of the Second Circuit's reinstatement of the plaintiff's case. He was also part of the Firm's trial team in the AT&T securities litigation, which AT&T and its former officers paid $100 million to settle after two weeks of trial. Prior to joining the Firm, he served as a judicial extern for the Honorable J. Clifford Wallace of the United States Court of Appeals for the Ninth Circuit, and served as a judicial law clerk for the Honorable Alan C. Kay of the United States District Court for the District of Hawaii.

Education

B.A., Point Loma College, 1987; J.D., University of San Diego School of Law, 1990

Honors / Awards

Super Lawyer, 2016-2017; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; J.D., *Cum Laude*, University of San Diego School of Law, 1990; Managing Editor, *San Diego Law Review*, University of San Diego School of Law

Jeffrey D. Light | Partner

Jeff Light is a partner in the Firm's San Diego office and also currently serves as a Judge Pro Tem for the San Diego County Superior Court. Light practices in the Firm's settlement department, negotiating, documenting, and obtaining court approval of the Firm's complex securities, merger, consumer and derivative actions. These settlements include *In re VeriFone Holdings , Inc. Sec. Litig.* ($95 million recovery); *Louisiana Mun. Police Ret. Sys. v. KPMG, LLP* ($31.6 million recovery); *In re Kinder Morgan, Inc. S'holders Litig.* ($200 million recovery); *In re Qwest Commc'ns Int'l, Inc. Sec. Litig.* ($400 million recovery); *In re Currency Conversion Fee Antitrust Litig.* ($336 million recovery); and *In re AT&T Corp. Sec. Litig.* ($100 million recovery). Prior to joining the Firm, he served as a law clerk to the Honorable Louise DeCarl Adler, United States Bankruptcy Court, Southern District of California, and the Honorable James Meyers, Chief Judge, United States Bankruptcy Court, Southern District of California.

Education

B.A., San Diego State University, 1987; J.D., University of San Diego School of Law, 1991

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; J.D., *Cum Laude*, University of San Diego School of Law, 1991; Judge Pro Tem, San Diego Superior Court; American Jurisprudence Award in Constitutional Law

Nathan R. Lindell | Partner

Nate Lindell is a partner in the Firm's San Diego office, where his practice focuses on representing aggrieved investors in complex civil litigation. He has helped achieve numerous significant recoveries for investors, including: *In re Enron Corp. Sec. Litig.* ($***7.2*** billion recovery); *In re HealthSouth Corp. Sec. Litig.* ($671 million recovery); *Luther v. Countrywide Fin. Corp.* ($500 million recovery); *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.* ($388 million recovery); *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* ($272 million recovery); *In re Morgan Stanley Mortgage Pass-Through Certificates Litig.* ($95 million recovery); *Massachusetts Bricklayers and Masons Trust Funds v. Deutsche Alt-A Securities, Inc.* ($32.5 million recovery); *City of Ann Arbor Employees' Ret. Sys. v. Citigroup Mortgage Loan Trust Inc.* ($24.9 million recovery); and *Plumbers' Union Local No. 12 Pension Fund v. Nomura Asset Acceptance Corp.* ($21.2 million recovery). In October 2016, Lindell successfully argued in front of the New York Supreme Court, Appellate Division, First Judicial Department, for the reversal of an earlier order granting defendants' motion to dismiss in *Phoenix Light SF Limited, et al. v. Morgan Stanley, et al.*

Lindell was also a member of the litigation team responsible for securing a landmark victory from the Second Circuit Court of Appeals in its precedent-setting *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* decision, which dramatically expanded the scope of permissible class actions asserting claims under the Securities Act of 1933 on behalf of mortgage-backed securities investors, and ultimately resulted in a $272 million recovery for investors.

Education

B.S., Princeton University, 2003; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; Charles W. Caldwell Alumni Scholarship, University of San Diego School of Law; CALI/AmJur Award in Sports and the Law

Ryan Llorens | Partner

Ryan Llorens is a partner in the Firm's San Diego office. Llorens' practice focuses on litigating complex securities fraud cases. He has worked on a number of securities cases that have resulted in significant recoveries for investors, including *In re HealthSouth Corp. Sec. Litig.* ($670 million); *AOL Time Warner* ($629 million); *In re AT&T Corp. Sec. Litig.* ($100 million); *In re Fleming Cos. Sec. Litig.* ($95 million); and *In re Cooper Cos., Inc. Sec Litig.* ($27 million).

Education

B.A., Pitzer College, 1997; J.D., University of San Diego School of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2015

Andrew S. Love | Partner

Andrew Love is a partner in the Firm's San Francisco office. His practice focuses primarily on appeals of securities fraud class action cases. Love has briefed and argued cases on behalf of defrauded investors and consumers in several U.S. Courts of Appeal, as well as in the California appellate courts. Prior to joining the Firm, Love represented inmates on California's death row in appellate and habeas corpus proceedings, successfully arguing capital cases in both the California Supreme Court and the Ninth Circuit. During his many years as a death penalty lawyer, he co-chaired the Capital Case Defense Seminar (2004-2013), recognized as the largest conference for death penalty practitioners in the country. He regularly presented at the seminar and at other conferences on a wide variety of topics geared towards effective appellate practice. Additionally, he was on the faculty of the National Institute for Trial Advocacy's Post-Conviction Skills Seminar. Love has also written several articles on appellate advocacy and capital punishment that have appeared in *The Daily Journal*, *CACJ Forum*, *American Constitution Society*, and other publications.

Education

University of Vermont, 1981; J.D., University of San Francisco School of Law, 1985

Honors / Awards

J.D., *Cum Laude*, University of San Francisco School of Law, 1985; McAuliffe Honor Society, University of San Francisco School of Law, 1982-1985

Carmen A. Medici | Partner

Carmen Medici is a partner in the Firm's San Diego office and focuses on complex antitrust class action litigation and unfair competition law. He represents businesses and consumers who are the victims of price-fixing, monopolization, collusion, and other anticompetitive and unfair business practices. Medici specializes in litigation against giants in the financial sector, and has worked on behalf of merchants in payment card cases for a decade. Medici is currently representing merchants in *B & R Supermarket, Inc. v. Visa, Inc.*, a large-scale case charging Visa, MasterCard, American Express and Discover with antitrust violations related to the implementation of a billion-dollar shift in liability for certain payment card transactions. He is also a part of the co-lead counsel team in *In re SSA Bonds Antitrust Litig.*, pending in the Southern District of New York, representing bond purchasers who were defrauded by a brazen price-fixing scheme perpetrated at some of the nation's largest banks.

In federal district court in New Jersey, Medici litigates *Lincoln Adventures, LLC v. Those Certain Underwriters at Lloyd's London*, where he represents buyers of insurance in an antitrust action against insurance companies in the London market. He is also a member of the co-lead litigation team in *In re Aluminum Warehousing Antitrust Litig.*, currently on appeal before the Second Circuit. He is also a member of the team in *In re Digital Music Antitrust Litig.*, pending in the Southern District of New York. In the past, Medici was a member of the discovery team in *In re NCAA Student-Athlete Name & Likeness Licensing Litig.*, which culminated in a trial victory for student athletes against the NCAA. He was also on the litigation team in *In re Fresh & Process Potatoes Antitrust Litig.*, which resulted in a multi-million dollar settlement. In addition, he is involved in a number of the Firm's other major antitrust and consumer actions. Medici regularly identifies and pursues potential new antitrust matters and drafts complaints on behalf of individual and class plaintiffs.

Education

B.S., Arizona State University, 2003; J.D., University of San Diego School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2015-2017

Mark T. Millkey | Partner

Mark Millkey is a partner in the Firm's Melville office. He has significant experience in the areas of securities and consumer litigation, as well as in federal and state court appeals.

During his career, Millkey has worked on a major consumer litigation against MetLife that resulted in a benefit to the class of approximately $1.7 billion, as well as a securities class action against Royal Dutch/Shell that settled for a minimum cash benefit to the class of $130 million and a contingent value of more than $180 million. Since joining Robbins Geller, he has worked on securities class actions that have resulted in approximately $300 million in settlements.

Education

B.A., Yale University, 1981; M.A., University of Virginia, 1983; J.D., University of Virginia, 1987

Honors / Awards

Super Lawyer, 2013-2016

David W. Mitchell | Partner

David Mitchell is a partner in the Firm's San Diego office and focuses his practice on securities fraud, antitrust and derivative litigation. He leads the Firm's antitrust benchmark litigations as well as the Firm's pay-for-delay actions. He has served as lead or co-lead counsel in numerous cases and has helped achieve substantial settlements for shareholders. His recent cases include *Dahl v. Bain Capital Partners, LLC*, obtaining more than $590 million for shareholders, and *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig*. Currently, Mitchell serves as court-appointed counsel in the ISDAfix Benchmark action and *In re Aluminum Warehousing Antitrust Litig.*

Prior to joining the Firm, he served as an Assistant United States Attorney in the Southern District of California and prosecuted cases involving narcotics trafficking, bank robbery, murder-for-hire, alien smuggling, and terrorism. Mitchell has tried nearly 20 cases to verdict before federal criminal juries and made numerous appellate arguments before the Ninth Circuit Court of Appeals.

Education

B.A., University of Richmond, 1995; J.D., University of San Diego School of Law, 1998

Honors / Awards

Super Lawyer, 2016-2017; Member, Enright Inn of Court; Antitrust Trailblazer, *The National Law Journal*, 2015; "Best of the Bar," *San Diego Business Journal*, 2014

Maureen E. Mueller | Partner

Maureen Mueller is a partner in the Firm's Boca Raton office, where her practice focuses on complex securities litigation. Mueller has helped recover more than $1 billion for investors. She was a member of the team of attorneys responsible for recovering a record-breaking $925 million for investors in *In re UnitedHealth Grp. Inc. PSLRA Litig*. Mueller was also a member of the Firm's trial team in *Jaffe v. Household Int'l, Inc.*, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. She also served as co-lead counsel in *In re Wachovia Preferred Securities and Bond/Notes Litig.*, which recovered $627 million.

Education

B.S., Trinity University, 2002; J.D., University of San Diego School of Law, 2007

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; "Outstanding Young Attorneys," *San Diego Daily Transcript*, 2010; Lead Articles Editor, *San Diego Law Review*, University of San Diego School of Law

Danielle S. Myers | Partner

Danielle Myers is a partner in the Firm's San Diego office, and focuses her practice on complex securities litigation. Myers is one of the partners that oversees the Portfolio Monitoring Program® and provides legal recommendations to the Firm's institutional investor clients on their options to maximize recoveries in securities litigation, both within the United States and internationally, from inception to settlement. In addition, Myers advises the Firm's clients in connection with lead plaintiff applications and has secured appointment of the Firm's clients as lead plaintiff in over 80 cases, including *Knurr v. Orbital ATK, Inc.*, No. 1:16-cv-01031 (E.D. Va.), *Evellard v. LendingClub Corp.*, No. 3:16-cv-02627 (N.D. Cal.), *In re Plains All American Pipeline, L.P. Sec. Litig.*, No. 4:15-cv-02404 (S.D. Tex.), *Marcus v. J.C. Penney Co., Inc.*, No. 6:13-cv-00736 (E.D. Tex.), *In re Hot Topic, Inc. Sec. Litig.*, No. 2:13-cv-02939 (C.D. Cal.), *Smilovits v. First Solar, Inc.*, No. 2:12-cv-00555 (D. Ariz.), and *In re Goldman Sachs Grp., Inc. Sec. Litig.*, No. 1:10-cv-03461 (S.D.N.Y.). Myers has obtained significant recoveries for shareholders in several cases, including: *In re Hot Topic, Inc. Sec. Litig.*, No. 2:13-cv-02939 (C.D. Cal.) ($14.9 million recovery); *Genesee Cty. Emps.' Ret. Sys. v. Thornburg Mortg., Inc.*, No. 1:09-cv-00300 (D.N.M.) ($11.25 million recovery); *Goldstein v. Tongxin Int'l Ltd.*, No. 2:11-cv-00348 (C.D. Cal.) ($3 million recovery); and *Lane v. Page*, No. Civ-06-1071 (D.N.M.) (pre-merger increase in cash consideration and post-merger cash settlement).

Education

B.A., University of California at San Diego, 1997; J.D., University of San Diego, 2008

Honors / Awards

Super Lawyer "Rising Star," 2015-2017; One of the "Five Associates to Watch in 2012," *Daily Journal*; Member, *San Diego Law Review*; CALI Excellence Award in Statutory Interpretation

Eric I. Niehaus | Partner

Eric Niehaus is a partner in the Firm's San Diego office, where his practice focuses on complex securities and derivative litigation. His efforts have resulted in numerous multi-million dollar recoveries to shareholders and extensive corporate governance changes. Recent examples include: *In re NYSE Specialists Sec. Litig.* (S.D.N.Y.); *In re Novatel Wireless Sec. Litig.* (S.D. Cal.); *Batwin v. Occam Networks, Inc.* (C.D. Cal.); *Commc'ns Workers of Am. Plan for Emps.' Pensions and Death Benefits v. CSK Auto Corp.* (D. Ariz.); *Marie Raymond Revocable Tr. v. Mat Five* (Del. Ch.); and *Kelleher v. ADVO, Inc.* (D. Conn.). Niehaus is currently prosecuting cases against several financial institutions arising from their role in the collapse of the mortgage-backed securities market. Prior to joining the Firm, Niehaus worked as a Market Maker on the American Stock Exchange in New York, and the Pacific Stock Exchange in San Francisco.

Education

B.S., University of Southern California, 1999; J.D., California Western School of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; J.D., *Cum Laude*, California Western School of Law, 2005; Member, *California Western Law Review*

Brian O. O'Mara | Partner

Brian O'Mara is a partner in the Firm's San Diego office. His practice focuses on complex securities and antitrust litigation. Since 2003, O'Mara has served as lead or co-lead counsel in numerous shareholder and antitrust actions, including: *Bennett v. Sprint Nextel Corp.* (D. Kan.) ($131 million recovery); *In re CIT Grp. Inc. Sec. Litig.* (S.D.N.Y.) ($75 million recovery); *In re MGM Mirage Sec. Litig.* (D. Nev.) ($75 million recovery); *C.D.T.S. No. 1 v. UBS AG* (S.D.N.Y.); *In re Aluminum Warehousing Antitrust Litig.* (S.D.N.Y.); and *Alaska Elec. Pension Fund v. Bank of Am. Corp.* (S.D.N.Y.). O'Mara has been responsible for a number of significant rulings, including*: Alaska Elec. Pension Fund v. Bank of Am. Corp.*, 175 F. Supp. 3d 44 (S.D.N.Y. 2016); *Bennett v. Sprint Nextel Corp.*, 298 F.R.D. 498 (D. Kan. 2014); *In re MGM Mirage Sec. Litig.*, 2013 U.S. Dist. LEXIS 139356 (D. Nev. 2013*); In re Constar Int'l, Inc. Sec. Litig.*, 2008 U.S. Dist. LEXIS 16966 (E.D. Pa. 2008), *aff'd*, 585 F.3d 774 (3d Cir. 2009); *In re Direct Gen. Corp. Sec. Litig.*, 2006 U.S. Dist. LEXIS 56128 (M.D. Tenn. 2006); and *In re Dura Pharm., Inc. Sec. Litig.*, 452 F. Supp. 2d 1005 (S.D. Cal. 2006). Prior to joining the Firm, he served as law clerk to the Honorable Jerome M. Polaha of the Second Judicial District Court of the State of Nevada.

Education

B.A., University of Kansas, 1997; J.D., DePaul University, College of Law, 2002

Honors / Awards

Super Lawyer, 2016-2017; CALI Excellence Award in Securities Regulation, DePaul University, College of Law

Lucas F. Olts | Partner

Luke Olts is a partner in the Firm's San Diego office, where his practice focuses on securities litigation on behalf of individual and institutional investors. Olts has recently focused on litigation related to residential mortgage-backed securities, and has served as lead counsel or co-lead counsel in some of the largest recoveries arising from the collapse of the mortgage market. For example, he was a member of the team that recovered $388 million for investors in J.P. Morgan residential mortgage-backed securities in *Fort Worth Employees' Retirement Fund v. J.P. Morgan Chase & Co.,* and a member of the litigation team responsible for securing a $272 million settlement on behalf of mortgage-backed securities investors in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.* Olts also served as co-lead counsel in *In re Wachovia Preferred Securities and Bond/Notes Litig.*, which recovered $627 million under the Securities Act of 1933. He also served as lead counsel in *Siracusano v. Matrixx Initiatives, Inc.*, in which the U.S. Supreme Court unanimously affirmed the decision of the Ninth Circuit that plaintiffs stated a claim for securities fraud under §10(b) of the Securities Exchange Act of 1934 and SEC Rule 10b-5. Prior to joining the Firm, Olts served as a Deputy District Attorney for the County of Sacramento, where he tried numerous cases to verdict, including crimes of domestic violence, child abuse and sexual assault.

Education

B.A., University of California, Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Top Litigator Under 40, *Benchmark Litigation*, 2016-2017

Steven W. Pepich | Partner

Steve Pepich is a partner in the Firm's San Diego office. His practice has focused primarily on securities class action litigation, but has also included a wide variety of complex civil cases, including representing plaintiffs in mass tort, royalty, civil rights, human rights, ERISA and employment law actions. Pepich has participated in the successful prosecution of numerous securities class actions, including: *Carpenters Health & Welfare Fund v. Coca-Cola Co.*, No. 1:00-CV-2838 ($137.5 million recovery); *In re Fleming Cos. Inc. Sec. & Derivative Litig.*, No. 5-03-MD-1530 ($95 million recovered); *In re Boeing Sec. Litig.*, No. C-97-1715Z ($92 million recovery); *In re Louisiana-Pacific Corp. Sec. Litig.*, No. C-95-707 ($65 million recovery); *Haw. Structural Ironworkers Pension Trust Fund v. Calpine Corp.*, No. 1-04-CV-021465 ($43 million recovery); *In re Advanced Micro Devices Sec. Litig.*, No. C-93-20662 ($34 million recovery); and *Gohler v. Wood*, No. 92-C-181 ($17.2 million recovery). Pepich was a member of the plaintiffs' trial team in *Mynaf v. Taco Bell Corp.*, which settled after two months of trial on terms favorable to two plaintiff classes of restaurant workers for recovery of unpaid wages. He was also a member of the plaintiffs' trial team in *Newman v. Stringfellow* where, after a nine-month trial in Riverside, California, all claims for exposure to toxic chemicals were ultimately resolved for $109 million.

Education

B.S., Utah State University, 1980; J.D., DePaul University, 1983

Daniel J. Pfefferbaum | Partner

Daniel Pfefferbaum is a partner in the Firm's San Francisco office, where his practice focuses on complex securities litigation. He has been a member of litigation teams that have recovered more than $100 million for investors, including: *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* ($65 million recovery); *In re PMI Grp., Inc. Sec. Litig.* ($31.25 million recovery); *Cunha v. Hansen Natural Corp.* ($16.25 million recovery); *In re Accuray Inc. Sec. Litig.* ($13.5 million recovery); and *Twinde v. Threshold Pharm., Inc.* ($10 million recovery). Pfefferbaum was a member of the litigation team that secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members will be eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis.

Education

B.A., Pomona College, 2002; J.D., University of San Francisco School of Law, 2006; LL.M. in Taxation, New York University School of Law, 2007

Honors / Awards

Top 40 Under 40, *Daily Journal*, 2017; Top Litigator Under 40, *Benchmark Litigation*, 2016-2017; Super Lawyer "Rising Star," 2013-2016

Theodore J. Pintar | Partner

Ted Pintar is a partner in the Firm's San Diego office. Pintar has over 20 years of experience prosecuting securities fraud actions and derivative actions and over 15 years of experience prosecuting insurance-related consumer class actions, with recoveries in excess of $1 billion. He was part of the litigation team in the AOL Time Warner state and federal court securities opt-out actions, which arose from the 2001 merger of America Online and Time Warner. These cases resulted in a global settlement of $618 million. Pintar was also on the trial team in *Knapp v. Gomez*, which resulted in a plaintiff's verdict. Pintar has successfully prosecuted several RICO cases involving the deceptive sale of deferred annuities, including cases against Allianz Life Insurance Company of North America ($250 million), American Equity Investment Life Insurance Company ($129 million), Midland National Life Insurance Company ($80 million) and Fidelity & Guarantee Life Insurance Company ($53 million). He has participated in the successful prosecution of numerous other insurance and consumer class actions, including: (i) actions against major life insurance companies such as Manufacturer's Life ($555 million initial estimated settlement value) and Principal Mutual Life Insurance Company ($380+ million) involving the deceptive sale of life insurance; (ii) actions against major homeowners insurance companies such as Allstate ($50 million) and Prudential Property and Casualty Co. ($7 million); (iii) actions against automobile insurance companies such as the Auto Club and GEICO; and (iv) actions against Columbia House ($55 million) and BMG Direct, direct marketers of CDs and cassettes. Additionally, Pintar has served as a panelist for numerous Continuing Legal Education seminars on federal and state court practice and procedure.

Education

B.A., University of California, Berkeley, 1984; J.D., University of Utah College of Law, 1987

Honors / Awards

Super Lawyer, 2014-2017; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; CAOC Consumer Attorney of the Year Award Finalist, 2015; Note and Comment Editor, *Journal of Contemporary Law*, University of Utah College of Law; Note and Comment Editor, *Journal of Energy Law and Policy*, University of Utah College of Law

Willow E. Radcliffe | Partner

Willow Radcliffe is a partner in the Firm's San Francisco office and concentrates her practice on securities class action litigation in federal court. Radcliffe has been significantly involved in the prosecution of numerous securities fraud claims, including actions filed against Flowserve, NorthWestern and Ashworth, and has represented plaintiffs in other complex actions, including a class action against a major bank regarding the adequacy of disclosures made to consumers in California related to Access Checks. Prior to joining the Firm, she clerked for the Honorable Maria-Elena James, Magistrate Judge for the United States District Court for the Northern District of California.

Education

B.A., University of California, Los Angeles 1994; J.D., Seton Hall University School of Law, 1998

Honors / Awards

J.D., *Cum Laude*, Seton Hall University School of Law, 1998; Most Outstanding Clinician Award; Constitutional Law Scholar Award

Mark S. Reich | Partner

Mark Reich is a partner in the Firm's New York office. Reich focuses his practice on challenging unfair mergers and acquisitions in courts throughout the country. Reich's notable cases include: *In re Aramark Corp. S'holders Litig.*, where he achieved a $222 million increase in consideration paid to shareholders of Aramark and a substantial reduction to management's voting power – from 37% to 3.5% – in connection with the approval of the going-private transaction; *In re Delphi Fin. Grp. S'holders Litig.*, resulting in a $49 million post-merger settlement for Class A Delphi shareholders; and *In re TD Banknorth S'holders Litig.*, where Reich played a significant role in raising the inadequacy of the $3 million initial settlement, which the court rejected as wholly inadequate, and later resulted in a vastly increased $50 million recovery.

Reich has also played a central role in other shareholder related litigation. His cases include *In re Gen. Elec. Co. ERISA Litig.*, resulting in structural changes to company's 401(k) plan valued at over $100 million, benefiting current and future plan participants, and *In re Doral Fin. Corp. Sec. Litig.*, obtaining a $129 million recovery for shareholders in a securities fraud litigation.

Education

B.A., Queens College, 1997; J.D., Brooklyn Law School, 2000

Honors / Awards

Super Lawyer, 2013-2016; Member, *The Journal of Law and Policy*, Brooklyn Law School; Member, Moot Court Honor Society, Brooklyn Law School

Jack Reise | Partner

Jack Reise is a partner in the Firm's Boca Raton office. Devoted to protecting the rights of those who have been harmed by corporate misconduct, his practice focuses on class action litigation (including securities fraud, shareholder derivative actions, consumer protection, antitrust, and unfair and deceptive insurance practices). Reise also dedicates a substantial portion of his practice to representing shareholders in actions brought under the federal securities laws. He is currently serving as lead counsel in more than a dozen cases nationwide. As lead counsel, Reise represented investors in a series of cases involving mutual funds charged with improperly valuating their net assets, which settled for a total of more than $50 million. Other notable actions include: *In re NewPower Holdings Sec. Litig.* ($41 million settlement); *In re Red Hat Sec. Litig.* ($20 million settlement); and *In re AFC Enters., Inc. Sec. Litig.* ($17.2 million settlement). Prior to joining the Firm, Reise represented individuals suffering the debilitating effects of asbestos exposure back in the 1950s and 1960s.

Education

B.A., Binghamton University, 1992; J.D., University of Miami School of Law, 1995

Honors / Awards

American Jurisprudence Book Award in Contracts; J.D., *Cum Laude*, University of Miami School of Law, 1995; *University of Miami Inter-American Law Review*, University of Miami School of Law

Darren J. Robbins | Partner

Darren Robbins is a founding partner of Robbins Geller Rudman & Dowd LLP. Over the last two decades, he has served as lead counsel in more than 100 securities class actions and has recovered billions of dollars for injured shareholders. Robbins has obtained significant recoveries in a number of actions arising out of wrongdoing related to the issuance of residential mortgage-backed securities, including the case against Goldman Sachs ($272 million recovery). Robbins also served as co-lead counsel in connection with a $627 million recovery for investors in *In re Wachovia Preferred Securities & Bond/Notes Litig.*, one of the largest credit-crisis settlements involving Securities Act claims. Robbins also recently served as lead counsel in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders.

One of the hallmarks of Robbins' practice has been his focus on corporate governance reform. In *UnitedHealth*, a securities fraud class action arising out of an options backdating scandal, Robbins represented lead plaintiff CalPERS and was able to obtain the cancellation of more than 3.6 million stock options held by the company's former CEO and secure a record $925 million cash recovery for shareholders. Robbins also negotiated sweeping corporate governance reforms, including the election of a shareholder-nominated director to the company's board of directors, a mandatory holding period for shares acquired via option exercise, and compensation reforms that tied executive pay to performance. Recently, Robbins led a shareholder derivative action brought by several pension funds on behalf of Community Health Systems, Inc. The case yielded a $60 million payment to Community Health (the largest recovery ever in a shareholder derivative action in Tennessee and the Sixth Circuit), as well as groundbreaking corporate governance reforms that included two shareholder-nominated directors, the creation and appointment of a Healthcare Law Compliance Coordinator, the implementation of a compensation clawback in the event of a restatement, the establishment of an insider trading controls committee, and the adoption of a political expenditure disclosure policy.

Education

B.S., University of Southern California, 1990; M.A., University of Southern California, 1990; J.D., Vanderbilt Law School, 1993

Honors / Awards

Lawyer of the Year, *Best Lawyers®*, 2017; Best Lawyer in America, *Best Lawyers®*, 2010-2017; Local Litigation Star, *Benchmark Litigation*, 2013-2017; Leading Lawyer in America, *Lawdragon*, 2006-2007, 2009-2017; Super Lawyer, 2013-2017; Leading Lawyer, *Chambers USA*, 2014-2016; Top 50 Lawyers in San Diego, *Super Lawyers Magazine,* 2015; One of the Top 100 Lawyers Shaping the Future, *Daily Journal*; One of the "Young Litigators 45 and Under," *The American Lawyer*; Attorney of the Year, *California Lawyer*; Managing Editor, *Vanderbilt Journal of Transnational Law*, Vanderbilt Law School

Robert J. Robbins | Partner

Robert Robbins is a partner in the Firm's Boca Raton office. He focuses his practice on investigating securities fraud, initiating securities class actions, and helping institutional and individual shareholders litigate their claims to recover investment losses caused by fraud. Representing shareholders in all aspects of class actions brought pursuant to the federal securities laws, Robbins provides counsel in numerous securities fraud class actions across the country, helping secure significant recoveries for investors. He has been a member of litigation teams responsible for the successful prosecution of many securities class actions, including: *Hospira* ($60 million recovery); *CVS Caremark* ($48 million recovery); *R.H. Donnelley* ($25 million recovery); *Spiegel* ($17.5 million recovery); *TECO Energy, Inc.* ($17.35 million recovery); *AFC Enterprises* ($17.2 million recovery); *Mannatech, Inc.* ($11.5 million recovery); *Newpark Resources, Inc.* ($9.24 million recovery); *Cryo Cell Int'l, Inc.* ($7 million recovery); *Gainsco* ($4 million recovery); and *Body Central* ($3.425 million recovery).

Education

B.S., University of Florida, 1999; J.D., University of Florida College of Law, 2002

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; J.D., High Honors, University of Florida College of Law, 2002; Member, *Journal of Law and Public Policy*, University of Florida College of Law; Member, *Phi Delta Phi*, University of Florida College of Law; *Pro bono* certificate, Circuit Court of the Eighth Judicial Circuit of Florida; Order of the Coif

Henry Rosen | Partner

Henry Rosen is a partner in the Firm's San Diego office, where he is a member of the Hiring Committee and Technology Committee, the latter of which focuses on applications to digitally manage documents produced during litigation and internally generate research files. He has significant experience prosecuting every aspect of securities fraud class actions and has obtained more than $1 billion on behalf of defrauded investors. Prominent cases include *In re Cardinal Health, Inc. Sec. Litig.*, in which Rosen recovered $600 million for defrauded shareholders. This $600 million settlement is the largest recovery ever in a securities fraud class action in the Sixth Circuit, and remains one of the largest settlements in the history of securities fraud litigation. Additional recoveries include: *Jones v. Pfizer Inc.* ($400 million); *In re First Energy* ($89.5 million); *In re CIT Grp. Inc. Sec. Litig* ($75 million); *Stanley v. Safeskin Corp.* ($55 million); *In re Storage Tech. Corp. Sec. Litig.* ($55 million); and *Rasner v. Sturm* (FirstWorld Communications) ($25.9 million).

Education

B.A., University of California, San Diego, 1984; J.D., University of Denver, 1988

Honors / Awards

Editor-in-Chief, *University of Denver Law Review*, University of Denver

David A. Rosenfeld | Partner

David Rosenfeld is a partner in the Firm's Melville and Manhattan offices. He has focused his practice of law for more than 15 years in the areas of securities litigation and corporate takeover litigation. He has been appointed as lead counsel in dozens of securities fraud lawsuits and has successfully recovered hundreds of millions of dollars for defrauded shareholders. Rosenfeld works on all stages of litigation, including drafting pleadings, arguing motions and negotiating settlements. Most recently, he led the Robbins Geller team in recovering in excess of $34 million for investors in Overseas Shipholding Group. Rosenfeld also led the effort that resulted in the recovery of nearly 90% of losses for investors in Austin Capital, a sub-feeder fund of Bernard Madoff. Rosenfeld has also achieved remarkable recoveries against companies in the financial industry. In addition to recovering $70 million for investors in Credit Suisse Group, and a $74.25 million recovery for First BanCorp shareholders, he recently settled claims against Barclays for $14 million, or 20% of investors' damages, for statements made about its LIBOR practices.

Education

B.S., Yeshiva University, 1996; J.D., Benjamin N. Cardozo School of Law, 1999

Honors / Awards

Advisory Board Member of *Stafford's Securities Class Action Reporter*; Future Star, *Benchmark Litigation*, 2016-2017; Super Lawyer, 2014-2016; Super Lawyer "Rising Star," 2011-2013

Robert M. Rothman | Partner

Robert Rothman is a partner in the Firm's New York offices. Rothman has extensive experience litigating cases involving investment fraud, consumer fraud and antitrust violations. He also lectures to institutional investors throughout the world. Rothman has served as lead counsel in numerous class actions alleging violations of securities laws, including cases against First Bancorp ($74.25 million recovery), CVS ($48 million recovery), Popular, Inc. ($37.5 million recovery), and iStar Financial, Inc. ($29 million recovery). He actively represents shareholders in connection with going-private transactions and tender offers. For example, in connection with a tender offer made by Citigroup, Rothman secured an increase of more than $38 million over what was originally offered to shareholders.

Education

B.A., State University of New York at Binghamton, 1990; J.D., Hofstra University School of Law, 1993

Honors / Awards

Super Lawyer, 2011, 2013-2016; Dean's Academic Scholarship Award, Hofstra University School of Law; J.D., with Distinction, Hofstra University School of Law, 1993; Member, *Hofstra Law Review*, Hofstra University School of Law

Samuel H. Rudman | Partner

Sam Rudman is a founding member of the Firm, a member of the Firm's Executive and Management Committees, and manages the Firm's New York offices. His 22-year securities practice focuses on recognizing and investigating securities fraud, and initiating securities and shareholder class actions to vindicate shareholder rights and recover shareholder losses. A former attorney with the SEC, Rudman has recovered hundreds of millions of dollars for shareholders, including a $200 million recovery in *Motorola*, a $129 million recovery in *Doral Financial*, an $85 million recovery in *Blackstone*, a $74 million recovery in *First BanCorp*, a $65 million recovery in *Forest Labs,* a $50 million recovery in *TD Banknorth*, and a $48 million recovery in *CVS Caremark*.

Education

B.A., Binghamton University, 1989; J.D., Brooklyn Law School, 1992

Honors / Awards

Local Litigation Star, *Benchmark Litigation*, 2013-2017; Litigation Star, *Benchmark Litigation*, 2013, 2017; Leading Lawyer in America, *Lawdragon*, 2016-2017; Leading Lawyer, *Chambers USA*, 2014-2016; Super Lawyer, 2007-2016; Dean's Merit Scholar, Brooklyn Law School; Moot Court Honor Society, Brooklyn Law School; Member, *Brooklyn Journal of International Law*, Brooklyn Law School

Joseph Russello | Partner

Joseph Russello is a partner in the Firm's Melville office, where he concentrates his practice on prosecuting shareholder class action and breach of fiduciary duty claims, as well as complex commercial litigation and consumer class actions. Russello joined the *Law360* Securities Editorial Advisory Board in 2017.

Russello has played a vital role in recovering millions of dollars for aggrieved investors, including those of Blackstone ($85 million); NBTY, Inc. ($16 million); LaBranche & Co., Inc. ($13 million); The Children's Place Retail Stores, Inc. ($12 million); Prestige Brands Holdings, Inc. ($11 million); and Jarden Corporation ($8 million). He also has significant experience in corporate takeover and breach of fiduciary duty litigation. In expedited litigation in the Delaware Court of Chancery involving Mat Five LLC, for example, his efforts paved the way for an "opt-out" settlement that offered investors more than $38 million in increased cash benefits. In addition, he played an integral role in convincing the Delaware Court of Chancery to enjoin Oracle Corporation's $1 billion acquisition of Art Technology Group, Inc. pending the disclosure of material information. He also has experience in litigating consumer class actions.

Prior to joining the Firm, Russello practiced in the professional liability group at Rivkin Radler LLP, where he defended attorneys, accountants and other professionals in state and federal litigation and assisted in evaluating and resolving complex insurance coverage matters.

Education

B.A., Gettysburg College, 1998; J.D., Hofstra University School of Law, 2001

Honors / Awards

Law360 Securities Editorial Advisory Board, 2017; Super Lawyer, 2014-2016

Scott H. Saham | Partner

Scott Saham is a partner in the Firm's San Diego office, where his practice focuses on complex securities litigation. He is licensed to practice law in both California and Michigan. Most recently, Saham was part of the litigation team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. He also served as lead counsel prosecuting the Pharmacia securities litigation in the District of New Jersey, which resulted in a $164 million recovery. Additionally, Saham was lead counsel in the *In re Coca-Cola Sec. Litig.* in the Northern District of Georgia, which resulted in a $137.5 million recovery after nearly eight years of litigation. He also obtained reversal from the California Court of Appeal of the trial court's initial dismissal of the landmark Countrywide mortgage-backed securities action. This decision is reported as *Luther v. Countrywide Fin. Corp.*, 195 Cal. App. 4th 789 (2011), and following this ruling that revived the action the case settled for $500 million.

Education

B.A., University of Michigan, 1992; J.D., University of Michigan Law School, 1995

Stephanie Schroder | Partner

Stephanie Schroder is a partner in the Firm's San Diego office. Schroder has significant experience prosecuting securities fraud class actions and shareholder derivative actions. Her practice also focuses on advising institutional investors, including multi-employer and public pension funds, on issues related to corporate fraud in the United States securities markets. Currently, she is representing clients that have suffered losses from the Madoff fraud in the *Austin Capital* and *Meridian Capital* litigations.

Schroder has obtained millions of dollars on behalf of defrauded investors. Prominent cases include *AT&T* ($100 million recovery at trial); *FirstEnergy* ($89.5 million recovery); *FirstWorld Commc'ns* ($25.9 million recovery). Major clients include the Pension Trust Fund for Operating Engineers, the Kentucky State District Council of Carpenters Pension Trust Fund, the Laborers Pension Trust Fund for Northern California, the Construction Laborers Pension Trust for Southern California, and the Iron Workers Mid-South Pension Fund.

Education

B.A., University of Kentucky, 1997; J.D., University of Kentucky College of Law, 2000

Jessica T. Shinnefield | Partner

Jessica Shinnefield is a partner in the Firm's San Diego office and currently focuses on initiating, investigating and prosecuting new securities fraud class actions. Shinnefield was a member of the litigation teams that obtained significant recoveries for investors in cases such as *AOL Time Warner*, *Cisco Systems*, *Aon* and *Petco*. Shinnefield was also a member of the litigation team prosecuting actions against investment banks and leading national credit rating agencies for their roles in structuring and rating structured investment vehicles backed by toxic assets. These cases are among the first to successfully allege fraud against the rating agencies, whose ratings have traditionally been protected by the First Amendment. She is currently litigating several securities actions, including an action against Omnicare, in which she helped obtain a favorable ruling from the U.S. Supreme Court.

Education

B.A., University of California at Santa Barbara, 2001; J.D., University of San Diego School of Law, 2004

Honors / Awards

Super Lawyer "Rising Star," 2015-2016; B.A., *Phi Beta Kappa*, University of California at Santa Barbara, 2001

Elizabeth A. Shonson | Partner

Elizabeth Shonson is a partner in the Firm's Boca Raton office. She concentrates her practice on representing investors in class actions brought pursuant to the federal securities laws. Shonson has litigated numerous securities fraud class actions nationwide, helping achieve significant recoveries for aggrieved investors. She was a member of the litigation teams responsible for recouping millions of dollars for defrauded investors, including: *In re Massey Energy Co. Sec. Litig.* (S.D. W.Va.) ($265 million); *Nieman v. Duke Energy Corp.* (W.D.N.C.) ($146.25 million recovery); *Eshe Fund v. Fifth Third Bancorp* (S.D. Ohio) ($16 million); *City of St. Clair Shores Gen. Emps. Ret. Sys. v. Lender Processing Servs., Inc.* (M.D. Fla.) ($14 million); and *In re Synovus Fin. Corp.* (N.D. Ga.) ($11.75 million).

Education

B.A., Syracuse University, 2001; J.D., University of Florida Levin College of Law, 2005

Honors / Awards

Super Lawyer "Rising Star," 2016; J.D., *Cum Laude*, University of Florida Levin College of Law, 2005; Editor-in-Chief, *Journal of Technology Law & Policy*; Phi Delta Phi; B.A., with Honors, *Summa Cum Laude*, Syracuse University, 2001; Phi Beta Kappa

Trig Smith | Partner

Trig Smith is a partner in the Firm's San Diego office. Smith focuses on complex securities class actions in which he has helped obtain significant recoveries for investors in cases such as *Cardinal Health* ($600 million); *Qwest* ($445 million); *Forest Labs.* ($65 million); *Accredo* ($33 million); and *Exide* ($13.7 million).

Education

B.S., University of Colorado, Denver, 1995; M.S., University of Colorado, Denver, 1997; J.D., Brooklyn Law School, 2000

Honors / Awards

Member, *Brooklyn Journal of International Law*, Brooklyn Law School; CALI Excellence Award in Legal Writing, Brooklyn Law School

Mark Solomon | Partner

Mark Solomon is a founding partner in the Firm's San Diego office and leads its international litigation practice. Over the last 23 years, he has regularly represented United States- and United Kingdom-based pension funds, and asset managers in class and non-class securities litigation in federal and state courts throughout the United States. He has been admitted to the Bars of England and Wales (Barrister), Ohio and California, but now practices exclusively in California, as well as in various United States federal district and appellate courts.

Solomon has spearheaded the prosecution of many significant securities fraud cases. He has obtained multi-hundred million dollar recoveries for plaintiffs in pre-trial settlements and significant corporate governance reforms designed to limit recidivism and promote appropriate standards. He litigated, through the rare event of trial, the securities class action against Helionetics Inc. and its executives, where he won a $15.4 million federal jury verdict. Prior to the most recent financial crisis, he was instrumental in obtaining some of the first mega-recoveries in the field in California and Texas, serving as co-lead counsel in *In re Informix Corp. Sec. Litig.* (N.D. Cal.) and recovering $131 million for Informix investors; and serving as co-lead counsel in *Schwartz v. TXU Corp.* (N.D. Tex.), where he helped obtain a recovery of over $149 million for a class of purchasers of TXU securities. Solomon is currently counsel to a number of pension funds serving as lead plaintiffs in cases throughout the United States.

Education

B.A., Trinity College, Cambridge University, England, 1985; L.L.M., Harvard Law School, 1986; Inns of Court School of Law, Degree of Utter Barrister, England, 1987

Honors / Awards

Super Lawyer, 2017; Lizette Bentwich Law Prize, Trinity College, 1983 and 1984; Hollond Travelling Studentship, 1985; Harvard Law School Fellowship, 1985-1986; Member and Hardwicke Scholar of the Honourable Society of Lincoln's Inn

Susan G. Taylor | Partner

Susan Goss Taylor is a partner in the Firm's San Diego office. Her practice focuses on securities fraud and antitrust litigation. Taylor served as a Special Assistant United States Attorney for the Southern District of California, where she obtained considerable trial experience prosecuting drug smuggling and alien smuggling cases. As a partner with Robbins Geller, Taylor has been responsible for prosecuting securities fraud class actions and has obtained substantial recoveries for investors in litigation involving WorldCom, Qwest, AOL Time Warner and Motorola.

Taylor also served as counsel on the Microsoft, DRAM and Private Equity antitrust litigation teams, as well as on a number of consumer actions alleging false and misleading advertising and unfair business practices against major corporations such as General Motors, Saturn, Mercedes-Benz USA, LLC, BMG Direct Marketing, Inc. and Ameriquest Mortgage Company.

Education

B.A., Pennsylvania State University, 1994; J.D., The Catholic University of America, Columbus School of Law, 1997

Honors / Awards

Super Lawyer, 2015-2016; Member, Moot Court Team, The Catholic University of America, Columbus School of Law

David C. Walton | Partner

David Walton is a partner in the Firm's San Diego office and a member of the Firm's Executive and Management Committees. He specializes in pursuing financial fraud claims, using his background as a Certified Public Accountant and Certified Fraud Examiner to prosecute securities law violations on behalf of investors. For over 20 years, he has prosecuted class actions and private actions on behalf of defrauded investors, particularly in the area of accounting fraud. He has investigated and participated in the litigation of highly complex accounting scandals within some of America's largest corporations, including Enron ($7.2 billion), HealthSouth ($671 million), WorldCom ($657 million), AOL Time Warner ($629 million), Countrywide ($500 million), and Dynegy ($474 million), as well as numerous companies implicated in stock option backdating. In 2003-2004, he served as a member of the California Board of Accountancy, which is responsible for regulating the accounting profession in California.

Education

B.A., University of Utah, 1988; J.D., University of Southern California Law Center, 1993

Honors / Awards

Super Lawyer, 2015-2016; California Board of Accountancy, Member, 2003-2004; *Southern California Law Review*, Member, University of Southern California Law Center; Hale Moot Court Honors Program, University of Southern California Law Center

Douglas Wilens | Partner

Douglas Wilens is a partner in the Firm's Boca Raton office. Wilens is a member of the Firm's appellate practice group, participating in numerous appeals in federal and state courts across the country. Most notably, Wilens handled successful appeals in the First Circuit Court of Appeals in *Mass. Ret. Sys. v. CVS Caremark Corp.*, 716 F.3d 229 (1st Cir. 2013) (reversal of order granting motion to dismiss), and in the Fifth Circuit Court of Appeals in *Lormand v. US Unwired, Inc.*, 565 F.3d 228 (5th Cir. 2009) (reversal of order granting motion to dismiss). Wilens is also involved in the Firm's lead plaintiff practice group, handling lead plaintiff issues arising under the PSLRA.

Prior to joining the Firm, Wilens was an associate at a nationally recognized firm, where he litigated complex actions on behalf of numerous professional sports leagues, including the National Basketball Association, the National Hockey League and Major League Soccer. He has also served as an adjunct professor at Florida Atlantic University and Nova Southeastern University, where he taught undergraduate and graduate-level business law classes.

Education

B.S., University of Florida, 1992; J.D., University of Florida College of Law, 1995

Honors / Awards

Book Award for Legal Drafting, University of Florida College of Law; J.D., with Honors, University of Florida College of Law, 1995

Shawn A. Williams | Partner

Shawn Williams is a partner in the Firm's San Francisco office and a member of the Firm's Management Committee. His practice focuses on securities class actions. Williams was among the lead class counsel for the Firm recovering investor losses in notable cases, including: *In re Krispy Kreme Doughnuts, Inc. Sec. Litig.* ($75 million); *In re Veritas Software Corp. Sec. Litig.* ($35 million); and *In re Cadence Design Sys. Sec. Litig.* ($38 million). Williams is also among the Firm's lead attorneys prosecuting shareholder derivative actions, securing tens of millions of dollars in cash recoveries and negotiating the implementation of comprehensive corporate governance enhancements, such as *In re McAfee, Inc. Derivative Litig.*; *In re Marvell Tech. Grp. Ltd. Derivative Litig.*; *In re KLA Tencor S'holder Derivative Litig.*; and *The Home Depot, Inc. Derivative Litig*. Prior to joining the Firm in 2000, Williams served for 5 years as an Assistant District Attorney in the Manhattan District Attorney's Office, where he tried over 20 cases to New York City juries and led white-collar fraud grand jury investigations.

Education

B.A., The State of University of New York at Albany, 1991; J.D., University of Illinois, 1995

Honors / Awards

Super Lawyer, 2014-2016; Board Member, California Bar Foundation, 2012-present

David T. Wissbroecker | Partner

David Wissbroecker is a partner in the Firm's San Diego and Chicago offices and focuses his practice on securities class action litigation in the context of mergers and acquisitions, representing both individual shareholders and institutional investors. Wissbroecker has litigated numerous high profile cases in Delaware and other jurisdictions, including shareholder class actions challenging the acquisitions of Kinder Morgan, Del Monte Foods, Affiliated Computer Services and Rural Metro. As part of the deal litigation team at Robbins Geller, Wissbroecker has helped secure monetary recoveries for shareholders that collectively exceed $600 million. Prior to joining the Firm, Wissbroecker served as a staff attorney for the United States Court of Appeals for the Seventh Circuit, and then as a law clerk for the Honorable John L. Coffey, Circuit Judge for the Seventh Circuit.

Education

B.A., Arizona State University, 1998; J.D., University of Illinois College of Law, 2003

Honors / Awards

Super Lawyer "Rising Star," 2015; J.D., *Magna Cum Laude*, University of Illinois College of Law, 2003; B.A., *Cum Laude*, Arizona State University, 1998

Christopher M. Wood | Partner

Christopher Wood is a partner in the Firm's Nashville office, where his practice focuses on complex securities litigation. He has been a member of litigation teams responsible for recovering hundreds of millions of dollars for investors, including: *In re Massey Energy Co. Sec. Litig.* ($265 million recovery); *In re VeriFone Holdings, Inc. Sec. Litig.* ($95 million recovery); *Garden City Emps.' Ret. Sys. v. Psychiatric Sols., Inc.* ($65 million recovery); *In re Micron Tech., Inc. Sec. Litig.* ($42 million recovery); and *Winslow v. BancorpSouth, Inc.* ($29.5 million recovery).

Wood has provided *pro bono* legal services through the San Francisco Bar Association's Volunteer Legal Services Program, the Ninth Circuit's Pro Bono Program, Volunteer Lawyers & Professionals for the Arts, and Tennessee Justice for Our Neighbors.

Education

B.A., Vanderbilt University, 2003; J.D., University of San Francisco School of Law, 2006

Honors / Awards

Super Lawyer "Rising Star," 2011-2013, 2015-2016

Debra J. Wyman | Partner

Debra Wyman is a partner in the Firm's San Diego office. She specializes in securities litigation and has litigated numerous cases against public companies in state and federal courts that have resulted in over $1 billion in securities fraud recoveries. Wyman was a member of the trial team in *Schuh v. HCA Holdings, Inc.*, which resulted in a $215 million recovery for shareholders, the largest securities class action recovery ever in Tennessee. The recovery represents between 34% and 70% of the aggregate damages, far exceeding the typical recovery in a securities class action. Wyman prosecuted the complex securities and accounting fraud case *In re HealthSouth Corp. Sec. Litig.*, one of the largest and longest-running corporate frauds in history, in which $671 million was recovered for defrauded HealthSouth investors. She was also part of the trial team that litigated *In re AT&T Corp. Sec. Litig.*, which was tried in the United States District Court, District of New Jersey, and settled after only two weeks of trial for $100 million. Most recently, Wyman was part of the litigation team that secured a $64 million recovery for Dana Corp. shareholders in *Plumbers & Pipefitters National Pension Fund v. Burns*, in which the Firm's Appellate Practice Group successfully appealed to the Sixth Circuit Court of Appeals twice, reversing the district court's dismissal of the action.

Education

B.A., University of California Irvine, 1990; J.D., University of San Diego School of Law, 1997

Honors / Awards

Super Lawyer, 2016-2017

Laura M. Andracchio | Of Counsel

Laura Andracchio is Of Counsel in the Firm's San Diego office. Having first joined the Firm in 1997, she was a Robbins Geller partner for ten years prior to her role as Of Counsel. As a partner with the Firm, Andracchio led countless securities fraud cases against public companies throughout the country, recovering hundreds of millions of dollars for injured investors. Her current focus remains securities fraud litigation under the federal securities laws.

Andracchio was a lead member of the trial team in *In re AT&T Corp. Sec. Litig.*, recovering $100 million for the class after two weeks of trial in district court in New Jersey. Prior to trial, she managed and litigated the case, which was pending for four years. She also led the trial team in *Brody v. Hellman*, a case against Qwest and former directors of U.S. West seeking an unpaid dividend, recovering $50 million for the class, which was largely comprised of U.S. West retirees. Other cases Andracchio has litigated include *City of Hialeah Emps.' Ret. Sys. v. Toll Bros., Inc.*, *Ross v. Abercrombie & Fitch Co.*, *In re GMH Cmtys. Tr. Sec. Litig.*, *In re Vicuron Pharm., Inc. Sec. Litig.* and *In re Navarre Corp. Sec. Litig.* Most recently, her focus is residential mortgage-backed securities litigation on behalf of investors against Wall Street financial institutions.

Education

B.A., Bucknell University, 1986; J.D., Duquesne University School of Law, 1989

Honors / Awards

Order of the Barristers, J.D., with honors, Duquesne University School of Law, 1989

Randi D. Bandman | Of Counsel

Randi Bandman has directed numerous complex securities cases at the Firm, such as the pending case of *In re BP plc Derivative Litig.*, a case brought to address the alleged utter failure of BP to ensure the safety of its operation in the United States, including Alaska, and which caused such devastating results as in the Deepwater Horizon oil spill, the worst environmental disaster in history. Bandman was instrumental in the Firm's development of representing coordinated groups of institutional investors in private opt-out cases that resulted in historical recoveries, such as in WorldCom and AOL Time Warner. Through her years at the Firm, she has represented hundreds of institutional investors, including domestic and non-U.S. investors, in some of the largest and most successful shareholder class actions ever prosecuted, resulting in billions of dollars of recoveries, involving such companies as Enron, Unocal and Boeing. Bandman was also instrumental in the landmark 1998 state settlement with the tobacco companies for $12.5 billion.

Education

B.A., University of California, Los Angeles; J.D., University of Southern California

Lea Malani Bays | Of Counsel

Lea Malani Bays is Of Counsel in the Firm's San Diego office. She focuses on e-discovery issues, from preservation through production, and provides counsel to the Firm's multi-disciplinary, e-discovery team consisting of attorneys, forensic analysts and database professionals. Through her role as counsel to the e-discovery team, Bays is very familiar with the various stages of e-discovery, including identification of relevant electronically stored information, data culling, predictive coding protocols, privilege and responsiveness reviews, as well as having experience in post-production discovery through trial preparation. Through speaking at various events, she is also a leader in shaping the broader dialogue on e-discovery issues.

Bays was recently part of the litigation team that earned the approval of a $131 million settlement in favor of plaintiffs in *Bennett v. Sprint Nextel Corp.* The settlement, which resolved claims arising from Sprint Corporation's ill-fated merger with Nextel Communications in 2005, represents a significant recovery for the plaintiff class, achieved after five years of tireless effort by the Firm. Prior to joining Robbins Geller, Bays was a Litigation Associate at Kaye Scholer LLP's New York office. She has experience in a wide range of litigation, including complex securities litigation, commercial contract disputes, business torts, antitrust, civil fraud, and trust and estate litigation.

Education

B.A., University of California, Santa Cruz, 1997; J.D., New York Law School, 2007

Honors / Awards

J.D., *Magna Cum Laude*, New York Law School, 2007; Executive Editor, *New York Law School Law Review*; Legal Aid Society's Pro Bono Publico Award; NYSBA Empire State Counsel; Professor Stephen J. Ellmann Clinical Legal Education Prize; John Marshall Harlan Scholars Program, Justice Action Center

Mary K. Blasy | Of Counsel

Mary Blasy is Of Counsel to the Firm's and is based in the Firm's Melville and Washington, D.C. offices. Her practice focuses on the investigation, commencement, and prosecution of securities fraud class actions and shareholder derivative suits. Blasy has recovered hundreds of millions of dollars for investors in securities fraud class actions against Reliance Acceptance Corp. ($66 million); Sprint Corp. ($50 million); Titan Corporation ($15+ million); Martha Stewart Omni-Media, Inc. ($30 million); and Coca-Cola Co. ($137.5 million). Blasy has also been responsible for prosecuting numerous complex shareholder derivative actions against corporate malefactors to address violations of the nation's securities, environmental and labor laws, obtaining corporate governance enhancements valued by the market in the billions of dollars.

In 2014, the Presiding Justice of the Appellate Division of the Second Department of the Supreme Court of the State of New York appointed Blasy to serve as a member of the Independent Judicial Election Qualification Commission, which reviews the qualifications of candidates seeking public election to New York State Supreme Courts in the 10th Judicial District. She also served on the *Law360* Securities Editorial Advisory Board from 2015 to 2016.

Education

B.A., California State University, Sacramento, 1996; J.D., UCLA School of Law, 2000

Honors / Awards

Super Lawyer, 2016; *Law360* Securities Editorial Advisory Board, 2015-2016; Member, Independent Judicial Election Qualification Commission, 2014-present

Bruce Boyens | Of Counsel

Bruce Boyens has served as Of Counsel to the Firm since 2001. A private practitioner in Denver, Colorado since 1990, Boyens specializes in issues relating to labor and environmental law, labor organizing, labor education, union elections, internal union governance and alternative dispute resolutions. In this capacity, he previously served as a Regional Director for the International Brotherhood of Teamsters elections in 1991 and 1995, and developed and taught collective bargaining and labor law courses for the George Meany Center, Kennedy School of Government, Harvard University, and the Kentucky Nurses Association, among others.

In addition, Boyens served as the Western Regional Director and Counsel for the United Mine Workers from 1983-1990, where he was the chief negotiator in over 30 major agreements, and represented the United Mine Workers in all legal matters. From 1973-1977, he served as General Counsel to District 17 of the United Mine Workers Association, and also worked as an underground coal miner during that time.

Education

J.D., University of Kentucky College of Law, 1973; Harvard University, Certificate in Environmental Policy and Management

Christopher Collins | Of Counsel

Christopher Collins is Of Counsel in the Firm's San Diego office. His practice areas include antitrust, consumer protection and tobacco litigation. Collins served as co-lead counsel in *Wholesale Elec. Antitrust Cases I & II*, charging an antitrust conspiracy by wholesale electricity suppliers and traders of electricity in California's newly deregulated wholesale electricity market wherein plaintiffs secured a global settlement for California consumers, businesses and local governments valued at more than $1.1 billion. He was also involved in California's tobacco litigation, which resulted in the $25.5 billion recovery for California and its local entities. Collins is currently counsel on the MemberWorks upsell litigation, as well as a number of consumer actions alleging false and misleading advertising and unfair business practices against major corporations. He formerly served as a Deputy District Attorney for Imperial County.

Education

B.A., Sonoma State University, 1988; J.D., Thomas Jefferson School of Law, 1995

Patrick J. Coughlin | Of Counsel

Patrick Coughlin is Of Counsel to the Firm and has served as lead counsel in several major securities matters, including one of the earliest and largest class action securities cases to go to trial, *In re Apple Comput. Sec. Litig.* Coughlin was recently one of the lead attorneys who secured a historic recovery on behalf of Trump University students in two class actions against President Donald J. Trump. The settlement provides $25 million to approximately 7,000 consumers. This result means individual class members will be eligible for upwards of $35,000 in restitution. He represented the class on a *pro bono* basis. Additional prominent securities class actions prosecuted by Coughlin include the *Enron* litigation ($***7.2*** billion recovery); the *Qwest* litigation ($445 million recovery); and the *HealthSouth* litigation ($671 million recovery). In addition to the numerous securities cases, Coughlin has handled a number of large antitrust cases including the Visa/Master Card *Interchange Fee* case, the *Currency Conversion* cases in which $360 million was recovered for consumers and the Private Equity litigation (*Dahl v. Bain Capital Partners, LLC*) in which $590.5 million was recovered for investors. Coughlin was formerly an Assistant United States Attorney in the District of Columbia and the Southern District of California, handling complex white-collar fraud matters.

Education

B.S., Santa Clara University, 1977; J.D., Golden Gate University, 1983

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Best Lawyer in America, *Best Lawyers®*, 2006-2017; Super Lawyer, 2004-2017; Antitrust Trailblazer, *The National Law Journal*, 2015; Leading Lawyer, Senior Statesman, *Chambers USA*, 2014-2016; Top 100 Lawyers, *Daily Journal*, 2008; Leading Lawyers in America, *Lawdragon*, 2006, 2008-2009

Michael J. Dowd | Of Counsel

Mike Dowd was a founding partner of the Firm. He has practiced in the area of securities litigation for 20 years, prosecuting dozens of complex securities cases and obtaining significant recoveries for investors in cases such as *UnitedHealth* ($925 million), *WorldCom* ($657 million), *AOL Time Warner* ($629 million), *Qwest* ($445 million) and *Pfizer* ($400 million). Dowd served as lead trial counsel in *Jaffe v. Household Int'l, Inc.* in the Northern District of Illinois, a securities class action that obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Dowd also served as the lead trial lawyer in *In re AT&T Corp. Sec. Litig.*, which was tried in the District of New Jersey and settled after only two weeks of trial for $100 million.

Dowd served as an Assistant United States Attorney in the Southern District of California from 1987-1991, and again from 1994-1998.

Education

B.A., Fordham University, 1981; J.D., University of Michigan School of Law, 1984

Honors / Awards

Best Lawyer in America, *Best Lawyers®*, 2015-2017; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Super Lawyer, 2010-2017; Leading Lawyer in America, *Lawdragon*, 2014-2016; Litigator of the Week, *The American* Lawyer, 2015; Litigation Star, *Benchmark Litigation* 2013; Directorship 100, NACD Directorship, 2012; Attorney of the Year, *California Lawyer*, 2010; Top 100 Lawyers, *Daily Journal*, 2009; Director's Award for Superior Performance, United States Attorney's Office; B.A., *Magna Cum Laude*, Fordham University, 1981

Alan I. Ellman | Of Counsel

Alan Ellman is Of Counsel in the Firm's Melville office, where he concentrates his practice on prosecuting complex securities fraud cases on behalf of institutional investors. Most recently, he was on the team of attorneys who recovered in excess of $34 million for investors in *In re OSG Sec. Litig.*, which represented an outsized recovery of 93% of bond purchasers' damages and 28% of stock purchasers' damages. The creatively structured settlement included more than $15 million paid by a bankrupt entity. In 2006, Ellman received a Volunteer and Leadership Award from Housing Conservation Coordinators (HCC) for his *pro bono* service defending a client in Housing Court against a non-payment action, arguing an appeal before the Appellate Term, and staffing HCC's legal clinic. He also successfully appealed a *pro bono* client's criminal sentence before the Appellate Division.

Education

B.S., B.A., State University of New York at Binghamton, 1999; J.D., Georgetown University Law Center, 2003

Honors / Awards

Super Lawyer "Rising Star," 2014-2015; B.S., B.A., *Cum Laude*, State University of New York at Binghamton, 1999

L. Thomas Galloway | Of Counsel

Thomas Galloway is Of Counsel to the Firm. Galloway is the founding partner of Galloway & Associates PLLC, a law firm that specializes in the representation of institutional investors – namely, public and multi-employer pension funds. He is also President of the Galloway Family Foundation, which funds investigative journalism into human rights abuses around the world.

Education

B.A., Florida State University, 1967; J.D., University of Virginia School of Law, 1972

Honors / Awards

Articles Editor, *University of Virginia Law Review*, University of Virginia School of Law; *Phi Beta Kappa*, University of Virginia School of Law; Trial Lawyer of the Year in the United States, 2003

Mitchell D. Gravo | Of Counsel

Mitchell Gravo is Of Counsel to the Firm and concentrates his practice on government relations. He represents clients before the Alaska Congressional delegation, the Alaska Legislature, the Alaska State Government and the Municipality of Anchorage.

Gravo's clients include Anchorage Economic Development Corporation, Anchorage Convention and Visitors Bureau, UST Public Affairs, Inc., International Brotherhood of Electrical Workers, Alaska Seafood International, Distilled Spirits Council of America, RIM Architects, Anchorage Police Department Employees Association, Fred Meyer, and the Automobile Manufacturer's Association. Prior to joining the Firm, he served as an intern with the Municipality of Anchorage, and then served as a law clerk to Superior Court Judge J. Justin Ripley.

Education

B.A., Ohio State University; J.D., University of San Diego School of Law

Helen J. Hodges | Of Counsel

Helen Hodges is Of Counsel in the Firm's San Diego office. She specializes in securities fraud litigation. Hodges has been involved in numerous securities class actions, including: *Dynegy*, which settled for $474 million; *Thurber v. Mattel*, which was settled for $122 million; *Nat'l Health Labs*, which was settled for $64 million; and *Knapp v. Gomez*, Civ. No. 87-0067-H(M) (S.D. Cal.), in which a plaintiffs' verdict was returned in a Rule 10b-5 class action. Additionally, beginning in 2001, Hodges focused on the prosecution of *Enron*, where a record $7.2 billion recovery was obtained for investors.

Education

B.S., Oklahoma State University, 1979; J.D., University of Oklahoma, 1983

Honors / Awards

Rated AV by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Super Lawyer, 2007; Oklahoma State University Foundation Board of Trustees, 2013

David J. Hoffa | Of Counsel

David Hoffa is Of Counsel in the Firm's Washington D.C. office. He has served as a liaison to over 110 institutional investors in portfolio monitoring, securities litigation and claims filing matters. His practice focuses on providing a variety of legal and consulting services to U.S. state and municipal employee retirement systems and single and multi-employer U.S. Taft-Hartley benefit funds. In addition to serving as a leader on the Firm's Israel Institutional Investor Outreach Team, Hoffa also serves as a member of the Firm's lead plaintiff advisory team, and advises public and multi-employer pension funds around the country on issues related to fiduciary responsibility, legislative and regulatory updates, and "best practices" in the corporate governance of publicly traded companies.

Early in his legal career, Hoffa worked for a law firm based in Birmingham, Michigan, where he appeared regularly in Michigan state court in litigation pertaining to business, construction and employment related matters. Hoffa has also appeared before the Michigan Court of Appeals on several occasions.

Education

B.A., Michigan State University, 1993; J.D., Michigan State University College of Law, 2000

Andrew W. Hutton | Of Counsel

Drew Hutton is Of Counsel in the Firm's San Diego and New York offices, responsible for simplifying cases of complex financial fraud. Hutton has prosecuted a variety of securities actions, achieving high-profile recoveries and results. Representative cases against corporations and their auditors include *In re AOL Time Warner Sec. Litig*. ($2.5 billion) and *In re Williams Cos. Sec. Litig*. ($311 million). Representative cases against corporations and their executives include *In re Broadcom Sec. Litig*. ($150 million) and *In re Clarent Corp. Sec. Litig*. (class plaintiff's 10b-5 jury verdict against former CEO). Hutton is also active in shareholder derivative litigation, achieving monetary recoveries and governance changes, including *In re Affiliated Computer Servs. Derivative Litig*. ($30 million), *In re KB Home S'holder Derivative Litig*. ($30 million) and *In re KeyCorp Derivative Litig*. (modified CEO stock options and governance). Hutton has also litigated securities cases in bankruptcy court (*In re WorldCom, Inc.* – $15 million for individual claimant) and a complex options case before FINRA (eight-figure settlement for individual investor). Hutton is also experienced in complex, multi-district consumer litigation. Representative nationwide insurance cases include *In re Prudential Sales Practices Litig*. ($4 billion), *In re Metro. Life Ins. Co. Sales Practices Litig*. ($2 billion) and *In re Conseco Life Ins. Co. Cost of Ins. Litig*. ($200 million). Representative nationwide consumer lending cases include a $30 million class settlement of Truth-in-Lending claims against American Express and a $24 million class settlement of RICO and RESPA claims against Community Bank of Northern Virginia (now PNC Bank).

Hutton is the founder of Hutton Law Group, a plaintiffs' litigation practice currently representing retirees, individual investors and businesses, and is also the founder of Hutton Investigative Accounting, a financial forensics and investigation firm. Prior founding Hutton Law and joining Robbins Geller, Hutton was a public company accountant, Certified Public Accountant, and broker of stocks, options and insurance products. Hutton has also served as an expert litigation consultant in both financial and corporate governance capacities. Hutton is often responsible for working with experts retained by the Firm in litigation and has conducted dozens of depositions of financial professionals, including audit partners, CFOs, directors, bankers, actuaries and opposing experts.

Education

B.A., University of California, Santa Barbara, 1983; J.D., Loyola Law School, 1994

Frank J. Janecek, Jr. | Of Counsel

Frank Janecek is Of Counsel in the Firm's San Diego office and practices in the areas of consumer/antitrust, Proposition 65, taxpayer and tobacco litigation. He served as co-lead counsel, as well as court appointed liaison counsel, in *Wholesale Elec. Antitrust Cases I & II*, charging an antitrust conspiracy by wholesale electricity suppliers and traders of electricity in California's newly deregulated wholesale electricity market. In conjunction with the Governor of the State of California, the California State Attorney General, the California Public Utilities Commission, the California Electricity Oversight Board, a number of other state and local governmental entities and agencies, and California's large, investor-owned electric utilities, plaintiffs secured a global settlement for California consumers, businesses and local governments valued at more than $1.1 billion. Janecek also chaired several of the litigation committees in California's tobacco litigation, which resulted in the $25.5 billion recovery for California and its local entities, and also handled a constitutional challenge to the State of California's Smog Impact Fee in *Ramos v. Dep't of Motor Vehicles*, which resulted in more than a million California residents receiving full refunds and interest, totaling $665 million.

Education

B.S., University of California, Davis, 1987; J.D., Loyola Law School, 1991

Honors / Awards

Super Lawyer, 2013-2017

Nancy M. Juda | Of Counsel

Nancy Juda is Of Counsel to the Firm and is based in the Firm's Washington, D.C. office. She concentrates her practice on employee benefits law and works in the Firm's Institutional Outreach Department. Using her extensive experience representing union pension funds, Juda advises Taft-Hartley fund trustees regarding their options for seeking redress for losses due to securities fraud. She also represents workers in ERISA class actions involving breach of fiduciary duty claims against corporate plan sponsors and fiduciaries.

Prior to joining the Firm, Juda was employed by the United Mine Workers of America Health & Retirement Funds, where she practiced in the area of employee benefits law. Juda was also associated with union-side labor law firms in Washington, D.C., where she represented the trustees of Taft-Hartley pension and welfare funds on qualification, compliance, fiduciary, and transactional issues under ERISA and the Internal Revenue Code.

Education

B.A., St. Lawrence University, 1988; J.D., American University, 1992

Francis P. Karam | Of Counsel

Frank Karam is Of Counsel to the Firm and is based in the Firm's Melville office. Karam is a trial lawyer with 30 years of experience. His practice focuses on complex class action litigation involving shareholders' rights and securities fraud. He also represents a number of landowners and royalty owners in litigation against large energy companies. He has tried complex cases involving investment fraud and commercial fraud, both on the plaintiff and defense side, and has argued numerous appeals in state and federal courts. Throughout his career, Karam has tried more than 100 cases to verdict.

Karam has served as a partner at several prominent plaintiffs' securities firms. From 1984 to 1990, Karam was an Assistant District Attorney in the Bronx, New York, where he served as a senior Trial Attorney in the Homicide Bureau. He entered private practice in 1990, concentrating on trial and appellate work in state and federal courts.

Education

A.B., College of the Holy Cross; J.D., Tulane University School of Law

Honors / Awards

"Who's Who" for Securities Lawyers, *Corporate Governance Magazine*, 2015

Jerry E. Martin | Of Counsel

Jerry Martin is Of Counsel in the Firm's Nashville office. He specializes in representing individuals who wish to blow the whistle to expose fraud and abuse committed by federal contractors, health care providers, tax cheats or those who violate the securities laws. Martin was a member of the litigation team that obtained a $65 million recovery in *Garden City Emps.' Ret. Sys. v. Psychiatric Solutions, Inc.*, the third largest securities recovery ever in the Middle District of Tennessee and the largest in more than a decade.

Prior to joining the Firm, Martin served as the presidentially appointed United States Attorney for the Middle District of Tennessee from May 2010 to April 2013. As U.S. Attorney, he made prosecuting financial, tax and health care fraud a top priority. During his tenure, Martin co-chaired the Attorney General's Advisory Committee's Health Care Fraud Working Group. Martin has been recognized as a national leader in combatting fraud and has addressed numerous groups and associations, such as Taxpayers Against Fraud and the National Association of Attorney Generals, and was a keynote speaker at the American Bar Association's Annual Health Care Fraud Conference.

Education

B.A., Dartmouth College, 1996; J.D., Stanford University, 1999

Honors / Awards

Super Lawyer, 2016

Ruby Menon | Of Counsel

Ruby Menon is Of Counsel to the Firm and serves as a member of the Firm's legal, advisory and business development group. She also serves as the liaison to the Firm's many institutional investor clients in the United States and abroad. For over 12 years, Menon served as Chief Legal Counsel to two large multi-employer retirement plans, developing her expertise in many areas of employee benefits and pension administration, including legislative initiatives and regulatory affairs, investments, tax, fiduciary compliance and plan administration.

Education

B.A., Indiana University, 1985; J.D., Indiana University School of Law, 1988

Eugene Mikolajczyk | Of Counsel

Eugene Mikolajczyk is Of Counsel to the Firm and is based in the Firm's San Diego Office. Mikolajczyk has over 30 years' experience prosecuting shareholder and securities litigation cases as both individual and class actions. Among the cases are *Heckmann v. Ahmanson*, in which the court granted a preliminary injunction to prevent a corporate raider from exacting greenmail from a large domestic media/entertainment company.

Mikolajczyk was a primary litigation counsel in an international coalition of attorneys and human rights groups that won a historic settlement with major U.S. clothing retailers and manufacturers on behalf of a class of over 50,000 predominantly female Chinese garment workers, in an action seeking to hold the Saipan garment industry responsible for creating a system of indentured servitude and forced labor. The coalition obtained an unprecedented agreement for supervision of working conditions in the Saipan factories by an independent NGO, as well as a substantial multi-million dollar compensation award for the workers.

Education

B.S., Elizabethtown College, 1974; J.D., Dickinson School of Law, Penn State University, 1978

Roxana Pierce | Of Counsel

Roxana Pierce is Of Counsel to the Firm and focuses her practice on securities litigation, arbitration, negotiations, contracts, international trade, real estate transactions and project development. She has represented clients in over 75 countries, with extensive experience in the Middle East, Asia, Russia, the former Soviet Union, Germany, Belgium, the Caribbean and India. Pierce counsels institutional investors on recourse available to them when the investors have been victims of fraud or other schemes. Pierce's client base includes large institutional investors, international banks, asset managers, foreign governments, multi-national corporations, sovereign wealth funds and high net worth individuals.

Pierce has counseled international clients since 1994. She has spearheaded the contract negotiations for hundreds of projects, including several valued at over $1 billion, and typically conducts her negotiations with the leadership of foreign governments and the leadership of Fortune 500 corporations, foreign and domestic. Pierce presently represents several European legacy banks in litigation concerning the 2008 financial crisis.

Education

B.A., Pepperdine University, 1988; J.D., Thomas Jefferson School of Law, 1994

Honors / Awards

Certificate of Accomplishment, Export-Import Bank of the United States

Svenna Prado | Of Counsel

Svenna Prado is Of Counsel in the Firm's San Diego office, where she focuses on various aspects of international securities and consumer litigation. She was part of the litigation teams that secured settlements against German defendant IKB, as well as Deutsche Bank and Deutsche Bank/West LB for their role in structuring residential mortgage-backed securities and their subsequent collapse. Prior to joining the Firm, Prado was Head of the Legal Department for a leading international staffing agency in Germany where she focused on all aspects of employment litigation and corporate governance. After she moved to the United States, Prado worked with an internationally oriented German law firm as Counsel to corporate clients establishing subsidiaries in the United States and Germany. As a law student, Prado worked directly for several years for one of the appointed Trustees winding up Eastern German operations under receivership in the aftermath of the German reunification. Utilizing her experience in this area of law, Prado later helped many clients secure successful outcomes in U.S. Bankruptcy Court.

Education

J.D., University of Erlangen-Nuremberg, Germany, 1996; Qualification for Judicial Office, Upper Regional Court Nuremberg, Germany, 1998; New York University, "U.S. Law and Methodologies," 2001

Christopher P. Seefer | Of Counsel

Christopher Seefer is Of Counsel in the Firm's San Francisco office. Seefer concentrates his practice in securities class action litigation. One recent notable recovery was a $30 million settlement with UTStarcom in 2010, a recovery that dwarfed a $150,000 penalty obtained by the SEC. Prior to joining the Firm, he was a Fraud Investigator with the Office of Thrift Supervision, Department of the Treasury (1990-1999), and a field examiner with the Office of Thrift Supervision (1986-1990).

Education

B.A., University of California Berkeley, 1984; M.B.A., University of California, Berkeley, 1990; J.D., Golden Gate University School of Law, 1998

Arthur L. Shingler III | Of Counsel

Arthur Shingler is Of Counsel to the Firm and is based in the Firm's San Diego office. Shingler has successfully represented both public and private sector clients in hundreds of complex, multi-party actions with billions of dollars in dispute. Throughout his career, he has obtained outstanding results for those he has represented in cases generally encompassing shareholder derivative and securities litigation, unfair business practices litigation, publicity rights and advertising litigation, ERISA litigation, and other insurance, health care, employment and commercial disputes.

Representative matters in which Shingler served as lead litigation or settlement counsel include, among others: *In re Royal Dutch/Shell ERISA Litig.* ($90 million settlement); *In re Priceline.com Sec. Litig.* ($80 million settlement); *In re General Motors ERISA Litig.* ($37.5 million settlement, in addition to significant revision of retirement plan administration); *Wood v. Ionatron, Inc.* ($6.5 million settlement); *In re Lattice Semiconductor Corp. Derivative Litig.* (corporate governance settlement, including substantial revision of board policies and executive management); *In re 360networks Class Action Sec. Litig.* ($7 million settlement); and *Rothschild v. Tyco Int'l (US), Inc.*, 83 Cal. App. 4th 488 (2000) (shaped scope of California's Unfair Practices Act as related to limits of State's False Claims Act).

Education

B.A., Point Loma Nazarene College, 1989; J.D., Boston University School of Law, 1995

Honors / Awards

B.A., *Cum Laude*, Point Loma Nazarene College, 1989

Leonard B. Simon | Of Counsel

Leonard Simon is Of Counsel in the Firm's San Diego office. His practice has been devoted to litigation in the federal courts, including both the prosecution and the defense of major class actions and other complex litigation in the securities and antitrust fields. Simon has also handled a substantial number of complex appellate matters, arguing cases in the United States Supreme Court, several federal Courts of Appeals, and several California appellate courts. He has also represented large, publicly traded corporations. Simon served as plaintiffs' co-lead counsel *in In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, MDL No. 834 (D. Ariz.) (settled for $240 million) and *In re NASDAQ Market-Makers Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.) (settled for more than $1 billion). He was also in a leadership role in several of the state court antitrust cases against Microsoft, and the state court antitrust cases challenging electric prices in California. He was centrally involved in the prosecution of *In re Washington Pub. Power Supply Sys. Sec. Litig.*, MDL No. 551 (D. Ariz.), the largest securities class action ever litigated.

Simon is an Adjunct Professor of Law at Duke University, the University of San Diego, and the University of Southern California Law Schools. He has lectured extensively on securities, antitrust, and complex litigation in programs sponsored by the American Bar Association Section of Litigation, the Practicing Law Institute, and ALI-ABA, and at the UCLA Law School, the University of San Diego Law School, and the Stanford Business School. He is an Editor of *California Federal Court Practice* and has authored a law review article on the PSLRA.

Education

B.A., Union College, 1970; J.D., Duke University School of Law, 1973

Honors / Awards

Top Lawyer in San Diego, *San Diego Magazine*, 2016-2017; Super Lawyer, 2008-2016; J.D., Order of the Coif and with Distinction, Duke University School of Law, 1973

Laura S. Stein | Of Counsel

Laura Stein is Of Counsel in the Firm's Philadelphia office. She focuses her practice in the areas of securities class action litigation, complex litigation and legislative law. In a unique partnership with her mother, attorney Sandra Stein, also Of Counsel to the Firm, the Steins focus on minimizing losses suffered by shareholders due to corporate fraud and breaches of fiduciary duty. The Steins also seek to deter future violations of federal and state securities laws by reinforcing the standards of good corporate governance. They work with over 500 institutional investors across the nation and abroad, and their clients have served as lead plaintiff in successful cases where billions of dollars were recovered for defrauded investors against such companies as AOL Time Warner, Tyco, Cardinal Health, AT&T, Hanover Compressor, First Bancorp, Enron, Dynegy, Honeywell International and Bridgestone.

Stein is Special Counsel to the Institute for Law and Economic Policy (ILEP), a think tank that develops policy positions on selected issues involving the administration of justice within the American legal system. She has also served as Counsel to the Annenberg Institute of Public Service at the University of Pennsylvania.

Education

B.A., University of Pennsylvania, 1992; J.D., University of Pennsylvania Law School, 1995

Sandra Stein | Of Counsel

Sandra Stein is Of Counsel to the Firm and concentrates her practice in securities class action litigation, legislative law and antitrust litigation. In a unique partnership with her daughter, Laura Stein, also Of Counsel to the Firm, the Steins focus on minimizing losses suffered by shareholders due to corporate fraud and breaches of fiduciary duty.

Previously, Stein served as Counsel to United States Senator Arlen Specter of Pennsylvania. During her service in the United States Senate, Stein was a member of Senator Specter's legal staff and a member of the United States Senate Judiciary Committee staff. She is also the Founder of the Institute for Law and Economic Policy (ILEP), a think tank that develops policy positions on selected issues involving the administration of justice within the American legal system. Stein has also produced numerous public service documentaries for which she was nominated for an Emmy and received an ACE award, cable television's highest award for excellence in programming.

Education

B.S., University of Pennsylvania, 1961; J.D., Temple University School of Law, 1966

Honors / Awards

Nominated for an Emmy and received an ACE award for public service documentaries

John J. Stoia, Jr. | Of Counsel

John Stoia is Of Counsel to the Firm and is based in the Firm's San Diego office. He is one of the founding partners and former managing partner of the Firm. He focuses his practice on insurance fraud, consumer fraud and securities fraud class actions. Stoia has been responsible for over $10 billion in recoveries on behalf of victims of insurance fraud due to deceptive sales practices such as "vanishing premiums" and "churning." He has worked on dozens of nationwide complex securities class actions, including *In re Am. Cont'l Corp./Lincoln Sav. & Loan Sec. Litig.*, which arose out of the collapse of Lincoln Savings & Loan and Charles Keating's empire. Stoia was a member of the plaintiffs' trial team that obtained verdicts against Keating and his co-defendants in excess of $3 billion and settlements of over $240 million.

He also represented numerous large institutional investors who suffered hundreds of millions of dollars in losses as a result of major financial scandals, including AOL Time Warner and WorldCom. Currently, Stoia is lead counsel in numerous cases against online discount voucher companies for violations of both federal and state laws including violation of state gift card statutes.

Education

B.S., University of Tulsa, 1983; J.D., University of Tulsa, 1986; LL.M., Georgetown University Law Center, 1987

Honors / Awards

Rated AV Preeminent by Martindale-Hubbell; Top Lawyer in San Diego, *San Diego Magazine*, 2013-2017; Super Lawyer, 2007-2017; Litigator of the Month, *The National Law Journal*, July 2000; LL.M. Top of Class, Georgetown University Law Center

Bruce Gamble | Special Counsel

Bruce Gamble is Special Counsel to the Firm and a member of the Institutional Outreach Department.

Gamble serves as a liaison with the Firm's institutional investor clients in the United States and abroad, advising them on securities litigation matters. Previously, he was General Counsel and Chief Compliance Officer for the District of Columbia Retirement Board, where he served as chief legal advisor to the Board of Trustees and staff. Gamble's experience also includes serving as Chief Executive Officer of two national trade associations and several senior level staff positions on Capitol Hill.

Education

B.S., University of Louisville, 1979; J.D., Georgetown University Law Center, 1989

Honors / Awards

Executive Board Member, National Association of Public Pension Attorneys, 2000-2006; American Banker selection as one of the most promising U.S. bank executives under 40 years of age, 1992

Carlton R. Jones | Special Counsel

Carlton Jones is Special Counsel to the Firm and is a member of the Intellectual Property group in the Atlanta office. Although Jones primarily focuses on patent litigation, he has experience handling a variety of legal matters of a technical nature, including performing invention patentability analysis and licensing work for the Centers for Disease Control as well as litigation involving internet streaming-audio licensing disputes and medical technologies. He is a registered Patent Attorney with the United States Patent and Trademark Office.

Education

B.S., Georgia Institute of Technology, 2006; J.D., Georgia State University College of Law, 2009

Tricia L. McCormick | Special Counsel

Tricia McCormick is Special Counsel to the Firm and focuses primarily on the prosecution of securities class actions. McCormick has litigated numerous cases against public companies in state and federal courts that resulted in hundreds of millions of dollars in recoveries for investors. She is also a member of a team that is in constant contact with clients who wish to become actively involved in the litigation of securities fraud. In addition, McCormick is active in all phases of the Firm's lead plaintiff motion practice.

Education

B.A., University of Michigan, 1995; J.D., University of San Diego School of Law, 1998

Honors / Awards

J.D., *Cum Laude*, University of San Diego School of Law, 1998

R. Steven Aronica | Forensic Accountant

Steven Aronica is a Certified Public Accountant licensed in the States of New York and Georgia and is a member of the American Institute of Certified Public Accountants, the Institute of Internal Auditors and the Association of Certified Fraud Examiners. Aronica has been instrumental in the prosecution of numerous financial and accounting fraud civil litigation claims against companies that include Lucent Technologies, Tyco, Oxford Health Plans, Computer Associates, Aetna, WorldCom, Vivendi, AOL Time Warner, Ikon, Doral Financial, First BanCorp, Acclaim Entertainment, Pall Corporation, iStar Financial, Hibernia Foods, NBTY, Tommy Hilfiger, Lockheed Martin, the Blackstone Group and Motorola. In addition, he assisted in the prosecution of numerous civil claims against the major United States public accounting firms.

Aronica has been employed in the practice of financial accounting for more than 30 years, including public accounting, where he was responsible for providing clients with a wide range of accounting and auditing services; the investment bank Drexel Burnham Lambert, Inc., where he held positions with accounting and financial reporting responsibilities; and at the SEC, where he held various positions in the divisions of Corporation Finance and Enforcement and participated in the prosecution of both criminal and civil fraud claims.

Education

B.B.A., University of Georgia, 1979

Andrew J. Rudolph | Forensic Accountant

Andrew Rudolph is the Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting expertise in connection with securities fraud litigation against national and foreign companies. He has directed hundreds of financial statement fraud investigations, which were instrumental in recovering billions of dollars for defrauded investors. Prominent cases include *Qwest*, *HealthSouth*, *WorldCom*, *Boeing*, *Honeywell*, *Vivendi*, *Aurora Foods*, *Informix*, *Platinum Software*, *AOL Time Warner*, and *UnitedHealth*.

Rudolph is a Certified Fraud Examiner and a Certified Public Accountant licensed to practice in California. He is an active member of the American Institute of Certified Public Accountants, California's Society of Certified Public Accountants, and the Association of Certified Fraud Examiners. His 20 years of public accounting, consulting and forensic accounting experience includes financial fraud investigation, auditor malpractice, auditing of public and private companies, business litigation consulting, due diligence investigations and taxation.

Education

B.A., Central Connecticut State University, 1985

Christopher Yurcek | Forensic Accountant

Christopher Yurcek is the Assistant Director of the Firm's Forensic Accounting Department, which provides in-house forensic accounting and litigation expertise in connection with major securities fraud litigation. He has directed the Firm's forensic accounting efforts on numerous high-profile cases, including *In re Enron Corp. Sec. Litig.* and *Jaffe v. Household Int'l, Inc.*, which obtained a record-breaking $1.575 billion settlement after 14 years of litigation, including a six-week jury trial in 2009 that resulted in a verdict for plaintiffs. Other prominent cases include *HealthSouth*, *UnitedHealth*, *Vesta*, *Informix*, *Mattel*, *Coca-Cola* and *Media Vision*.

Yurcek has over 20 years of accounting, auditing, and consulting experience in areas including financial statement audit, forensic accounting and fraud investigation, auditor malpractice, turn-around consulting, business litigation and business valuation. He is a Certified Public Accountant licensed in California, holds a Certified in Financial Forensics (CFF) Credential from the American Institute of Certified Public Accountants, and is a member of the California Society of CPAs and the Association of Certified Fraud Examiners.

Education

B.A., University of California, Santa Barbara, 1985

EXHIBIT B

EXHIBIT B

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

Firm Name: Robbins Geller Rudman & Dowd LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

(P) Partner
(A) Associate
(SA) Staff Attorney
(PL) Paralegal

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR
Bernay, Alexandra (P)			24.30		4.50			11.00			20.70				60.50	$735.00	$44,467.50
Merrick, Thomas (P)			1.00					0.80			0.20				2.00	$685.00	$1,370.00
Sweeney, Bonny (P)							0.50	1.20			0.90				2.60	$800.00	$2,080.00
Medici, Carmen (A)			0.60		32.30			0.70			2.50				36.10	$675.00	$24,367.50
Cho, Grace (SA)							320.30		2.50						322.80	$350.00	$112,980.00
Lendzion, Lauren (SA)							189.70								189.70	$350.00	$66,395.00
SUB-TOTAL	**0.00**	**0.00**	**25.90**	**0.00**	**36.80**	**0.00**	**510.50**	**13.70**	**2.50**	**0.00**	**24.30**	**0.00**	**0.00**	**0.00**	**613.70**		**$251,660.00**
NON-ATTORNEYS																	
Hortsman, Natalee J. (PL)												0.50			0.50	$295.00	$147.50
Kopko, Christina (PL)			0.20								4.00				4.20	$295.00	$1,239.00
McLure, Sarah J. (PL)								4.00							4.00	$295.00	$1,180.00
Wallbrett, Michele M. (PL)	1.00														1.00	$295.00	$295.00
SUB-TOTAL	**1.00**	**0.00**	**0.20**	**0.00**	**0.00**	**0.00**	**0.00**	**4.00**	**0.00**	**0.00**	**4.00**	**0.50**	**0.00**	**0.00**	**9.70**		**$2,861.50**
GRAND TOTAL:	**1.00**	**0.00**	**26.10**	**0.00**	**36.80**	**0.00**	**510.50**	**17.70**	**2.50**	**0.00**	**28.30**	**0.50**	**0.00**	**0.00**	**623.40**		**$254,521.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

ROBBINS GELLER RUDMAN & DOWD LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Bernay, Alexandra S. (P)	06/20/2013 - 07/08/2013	$635.00
Bernay, Alexandra S. (P)	02/18/2014 - 05/13/2014	$660.00
Bernay, Alexandra S. (P)	01/09/2015 - 05/28/2015	$690.00
Bernay, Alexandra S. (P)	01/14/2016 - 06/17/2016	$715.00
Merrick, Thomas R. (P)	06/18/2013 - 06/26/2013	$685.00
Sweeney, Bonny E. (P)	06/19/2013 - 06/20/2013	$775.00
Sweeney, Bonny E. (P)	02/14/2014 - 07/01/2014	$800.00
Medici, Carmen A. (A)	06/30/2013	$430.00
Medici, Carmen A. (A)	05/08/2014	$460.00
Medici, Carmen A. (A)	02/10/2016 - 06/15/2016	$545.00
Cho, Grace (SA)	03/19/2014 - 12/24/2014	$350.00
Cho, Grace (SA)	01/06/2015 - 01/26/2015	$350.00
Lendzion, Lauren M. (SA)	02/26/2014 - 10/08/2014	$350.00
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Horstman, Natalee J. (PL)	06/23/2016	$295.00
Kopko, Christina S. (PL)	01/12/2015 - 05/04/2015	$295.00
McLure, Sarah J. (PL)	05/08/2014	$295.00
Wallbrett, Michele M. (PL)	11/02/2016	$295.00

EXHIBIT D

(REDACTED)

In re Lithium Ion Batteries Antitrust Litigation
ROBBINS GELLER RUDMAN & DOWD LLP
Reported Hours and Lodestar (Historical Rates)
June 1, 2013 through February 28, 2017

DETAILED TIME REPORT

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
06/18/13	Merrick, Thomas	(P)	3	Drafting Discovery Answers/Responses	0.50	685	342.50	[redacted]
06/19/13	Merrick, Thomas	(P)	3	Drafting Discovery Answers/Responses	0.50	685	342.50	Office conference with Kopko to review draft client questionnaire responses; Research batteries in client's purchased products.
06/19/13	Sweeney, Bonny	(P)	11	Litigation Strategy, Analysis & Case Management	0.50	775	387.50	[redacted] regarding consolidated amended complaint.
06/20/13	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	2.70	635	1,714.50	Gather documents from plaintiffs; correspond with co-counsel.
06/20/13	Merrick, Thomas	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	0.30	685	205.50	Review draft client questionnaire for use in drafting consolidated complaint.
06/20/13	Merrick, Thomas	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	0.20	685	137.00	Correspondence with Sweeney and Kopko re revisions to same and [redacted]
06/20/13	Sweeney, Bonny	(P)	8	Drafting Pleadings, Briefs & Pretrial	1.00	775	775.00	[redacted] regarding consolidated amended

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
				Motions				complaint.
06/21/13	Merrick, Thomas	(P)	11	Litigation Strategy, Analysis & Case Management	0.20	685	137.00	Review draft client questionnaire for needed additional information.
06/24/13	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.50	635	952.50	[redacted] regarding taking part in litigation Gather documents from plaintiffs' review questionnaire.
06/26/13	Merrick, Thomas	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	0.30	685	205.50	[redacted] and send updated version to co-lead counsel.
06/26/13	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	4.00	635	2,540.00	[redacted] 4). Gather documents from plaintiffs and correspond with co-counsel (1).
06/30/13	Medici, Carmen	(A)	11	Litigation Strategy, Analysis & Case Management	0.50	430	215.00	Discussed items purchased by Kansas client for use in amended complaint.
07/03/13	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	2.00	635	1,270.00	[redacted]

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/08/13	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.30	635	825.50	Draft letter to [redacted]egarding case.
02/14/14	Sweeney, Bonny	(P)	11	Litigation Strategy, Analysis & Case Management	0.20	800	160.00	Email correspondence regarding document review with lead firms.
02/15/14	Sweeney, Bonny	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	0.20	800	160.00	Email correspondence regarding issues pertaining to motion to dismiss, amended complaint to lead firms.
02/18/14	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	0.40	660	264.00	Coordinate reviewers for project; discuss same with Lendzion.
02/25/14	Sweeney, Bonny	(P)	11	Litigation Strategy, Analysis & Case Management	0.20	800	160.00	Email communications and calls regarding discovery/document review with lead firms.
02/26/14	Lendzion, Lauren	(SA)	7	Document Review	4.50	350	1,575.00	Print and review all materials for review and participate in conference call re: Catalyst and coding.
03/03/14	Lendzion, Lauren	(SA)	7	Document Review	7.20	350	2,520.00	Review of Sanyo documents in Catalyst for amended complaint.
03/04/14	Lendzion, Lauren	(SA)	7	Document Review	7.70	350	2,695.00	Review and coding of Sanyo documents in Catalyst for amended complaint.
03/05/14	Lendzion, Lauren	(SA)	7	Document Review	5.00	350	1,750.00	Review and coding of Sanyo documents in Catalyst for amended complaint.
03/07/14	Lendzion, Lauren	(SA)	7	Document Review	3.00	350	1,050.00	Review of Sanyo documents with an eye towards amending

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
								complaints.
03/10/14	Lendzion, Lauren	(SA)	7	Document Review	8.00	350	2,800.00	Conference call to discuss status of review in anticipation of amending complaint; review of Sanyo documents in Catalyst.
03/11/14	Lendzion, Lauren	(SA)	7	Document Review	8.00	350	2,800.00	Review of Sanyo documents in Catalyst with an eye towards amending complaint (i.e., California contacts and agency/control).
03/17/14	Lendzion, Lauren	(SA)	7	Document Review	7.00	350	2,450.00	Continue indirect review of Sanyo documents in preparation for amended complaint focusing on amended complaint issues and extremely hot documents.
03/18/14	Lendzion, Lauren	(SA)	7	Document Review	7.70	350	2,695.00	Send Protective Order and relevant documents to Grace Cho for her review; continue my review of my batch of Sanyo documents with an eye towards Hot documents.
03/19/14	Cho, Grace	(SA)	7	Document Review	8.50	350	2,975.00	Batteries - Meeting with Lauren Lendizon for training on batteries case and use of Catalyst software. Review Issues Outline, Defendants List, Key People Cheat Sheet and First Amended Complaint for background of the case.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
03/19/14	Lendzion, Lauren	(SA)	7	Document Review	9.00	350	3,150.00	Meet with Grace Cho to train her on Catalyst, continue reviewing my final documents in my batch of Sanyo documents for any Hot documents that could be added to the amended complaint.
03/20/14	Cho, Grace	(SA)	7	Document Review	8.20	350	2,870.00	Finish review of First Amended Complaint and Motion to Dismiss for obtaining background of the case.
03/20/14	Lendzion, Lauren	(SA)	7	Document Review	9.50	350	3,325.00	Finish review of my batch of documents in the Sanyo database for any last minute documents that could be helpful for amending the complaint.
04/02/14	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	2.00	660	1,320.00	Call and email with co-counsel regarding errors in the filing of the complaint and demand that they be corrected.
04/11/14	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	0.30	660	198.00	Calls and emails to J. King co-counsel regarding fixing errors in complaint.
05/06/14	Bernay, Alexandra	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	4.00	660	2,640.00	Draft opposition to motion to dismiss NEC Corporation.
05/08/14	Bernay, Alexandra	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	5.00	660	3,300.00	Work on opposition to motion to dismiss NEC corp.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
05/08/14	McLure, Sarah J.	(PL)	8	Drafting Pleadings, Briefs & Pretrial Motions	4.00	295	1,180.00	Proof opposition to motion to dismiss (cite check, quote check, check docket entries) (3.4); proof edits (.5); conf. w/ atty ASB re: questions. (.1).
05/08/14	Medici, Carmen	(A)	8	Drafting Pleadings, Briefs & Pretrial Motions	0.70	460	322.00	Drafted section against NEC for motion to dismiss opposition; communications w/ASB re: same.
05/13/14	Bernay, Alexandra	(P)	8	Drafting Pleadings, Briefs & Pretrial Motions	2.00	660	1,320.00	Complete opp to motion to dismiss.
05/30/14	Cho, Grace	(SA)	9	Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.	2.50	350	875.00	Review materials (Batteries Merit Review Manual, cast of characters, key terms) sent by Jaclyn Verducci in preparation for upcoming training session.
06/04/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Prepare for and attend Batteries Antitrust Reviewer Training, hosted by Josh Schmitt. Download assignment in Catalyst Sony English database and begin relevancy review and coding of documents - documents see were Sony org charts (timeframe early 2000's).
06/04/14	Lendzion, Lauren	(SA)	7	Document Review	7.50	350	2,625.00	Call with document review team regarding Catalyst training and document review instructions. Review of Corrected Consolidated 2nd Amended Complaint; review of Document Review manual.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
06/05/14	Lendzion, Lauren	(SA)	7	Document Review	8.00	350	2,800.00	Review of Sony documents (4). Code documents for Steve Jaska (3.8); phone call with Catalyst re: system errors (.2).
06/09/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Document review of bates SEL DOJ 00000066 - SEL DOJ 000001582 in "Sony English" database. Documents in this range contained 2003-2011 Org charts for Sony Component Solutions Business Division.
06/12/14	Cho, Grace	(SA)	7	Document Review	7.00	350	2,450.00	Review for relevancy documents SEL DOJ 000001583 - SEL DOJ 000001637 in "Sony English" database - 2004 Org charts for Sony Component Solutions Business Division; SEL DOJ 000003804 - SEL DOJ 000004736 - Motorola, Philips, Sharp, Wintek, Boyd, LG, Apple, Sony, Sony Ericsson, Samsung and various other electronics' business cards from around the world.
06/13/14	Cho, Grace	(SA)	7	Document Review	5.50	350	1,925.00	Begin review of (SEL DOJ 000005136 - SEL DOJ 000005136) - 2008-2010 handwritten notebooks from the files of M Van Den Bogert (Sony's account manager for Motorola).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
06/18/14	Cho, Grace	(SA)	7	Document Review	8.20	350	2,870.00	Finish review of SEL DOJ 000004736 - Handwritten notebooks by M Van Den Bogert (Sony's account manager for Motorola) in 2008 and 2010 time frame. SEL DOJ 000006526 - SEL DOJ 000007029 - Business cards from Sony employees in various departments such as Marketing, Sales , Consumer Products, and Business.
06/19/14	Cho, Grace	(SA)	7	Document Review	4.50	350	1,575.00	Review Sony English documents in Begno range SEL DOJ 000007030 - SEL DOJ 000007755 - 2011 Travel expense reports for Alan Sund and R. Mccaul; SEL DOJ 000008122 - SEL DOJ 000008261; SEL DOJ 000008427 - SEL DOJ 000008554 - Sony business cards from various departments and locations, and other electronics company business cards.
06/20/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Review document Begnos: SEL DOJ 000008555 - SEL DOJ 000008882; SEL DOJ 000009067 - SEL DOJ 000009599 for relevancy, issue determination and evidentiary notes. Contents included more business cards from various companies that are potential customers or suppliers.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
06/23/14	Cho, Grace	(SA)	7	Document Review	7.70	350	2,695.00	Review of documents in the Sony English database at Begno range SEL DOJ 000010015 - SEL DOJ 000011951- documents reviewed were credit card statements and expense reports for 2007-2010, and calendars.
06/25/14	Cho, Grace	(SA)	7	Document Review	9.20	350	3,220.00	Review documents from Sony production in "Sony English" database for relevancy and issue determination. BegControl range: SEL DOJ 000011952 - SEL DOJ 000012335 - documents included handwritten notes from meetings with Garmin.
06/26/14	Cho, Grace	(SA)	7	Document Review	7.50	350	2,625.00	Continue relevancy and issue spotting review in "Sony English" database, begcontrol SEL DOJ 000012336 - SEL DOJ 000012603 - Handwritten notes in a notebooks w/ unknown author with notes around 2010 time frame.
06/27/14	Cho, Grace	(SA)	7	Document Review	5.20	350	1,820.00	Review Sony English production in Begno range: SEL DOJ 000012604 - SEL DOJ 000012650; SEL DOJ 000012052 - SEL DOJ 000012501, containing handwritten notebooks by unknown author regarding internal Sony meetings on products production, sales,

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
								pricing and capacity.
06/30/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Document review and relevancy and issue analysis of document range SEL DOJ 000012502 - SEL DOJ 000013750 in Sony English database. Documents in this range consisted of handwritten notebooks in the May 2007 time frame containing meeting notes for internal meetings and meetings with other companies such as Garmin, Apple, Dell and HP.
07/01/14	Cho, Grace	(SA)	7	Document Review	4.00	350	1,400.00	Review and analyze documents in Sony English database for Begno range SEL DOJ 000013751 - SEL DOJ 000014229. Documents consisted of travel planning documents such as airline flight lists and travel receipts.
07/01/14	Lendzion, Lauren	(SA)	7	Document Review	2.00	350	700.00	Conference Call re: Document review; review of document review manual.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/01/14	Sweeney, Bonny	(P)	7	Document Review	0.50	800	400.00	Call with lead counsel regarding discovery (.3); email correspondence regarding the same (.2).
07/02/14	Cho, Grace	(SA)	7	Document Review	9.00	350	3,150.00	Relevancy review, issue determination and attorney notes for depo prep in Sony English documents at SEL DOJ 000014230 - SEL DOJ 000015460; SEL DOJ 000017073 - SEL DOJ 000017832. Documents consisted of travel itineraries, receipts and expense reports for Alan Sund in 2004-2006 time frame.
07/03/14	Cho, Grace	(SA)	7	Document Review	6.00	350	2,100.00	Document review and depo prep analysis for Begno range SEL DOJ 000017833 - SEL DOJ 000018096. Documents consisted of handwritten notebooks, likely by Alan Sund in 2009 time frame, with notes on internal meetings and meeting with other companies.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/08/14	Cho, Grace	(SA)	7	Document Review	8.20	350	2,870.00	Perform relevancy review and issue analysis and coding for Sony English documents in Begno range SEL DOJ 000018097 - SEL DOJ 000019144 and Bates SONY-LIB-000015959 - SONY-LIB-000016037. Draft review notes into Draft Document Review Batch Memo July 2014. Documents seen were expense reports for Masafumi Amino in the 2003-2007 date range.
07/10/14	Cho, Grace	(SA)	7	Document Review	8.70	350	3,045.00	Perform document review and analysis of Sony English production documents in Bates range LIB-SONY-LIB-000016038 - SONY-LIB-000016934 - Expense reports for Steve Jaska (2003-2007). Begno SEL-DOJE-000000023 - SEL-DOJE-000000228 - Sony employee passports, outlook meeting reminders for custodian Aki Hasegawa.
07/11/14	Cho, Grace	(SA)	7	Document Review	7.50	350	2,625.00	Document review and analysis for depo prep in Begno range SEL-DOJE-000000229 - SEL-DOJE-000000586 - documents consisted of financial spreadsheets in 2006 and outlook contacts for custodian Aki Hasegawa.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/16/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Review "Sony English" documents in Begno range SEL-DOJE-000000587- SEL-DOJE-000000730 - documents consisted of Microsoft Office contacts in Aki Hasegawa custodial files.
07/16/14	Lendzion, Lauren	(SA)	7	Document Review	3.00	350	1,050.00	Review and code Sony documents- custodian S Jaska. The batch contained receipts and travel itineraries.
07/17/14	Cho, Grace	(SA)	7	Document Review	4.50	350	1,575.00	Continue review, coding and drafting attorney notes in Aki Hasegawa custodial Microsoft Office contacts in Begno range EL-DOJE-000000731- SEL-DOJE-000000901.
07/18/14	Cho, Grace	(SA)	7	Document Review	7.00	350	2,450.00	Perform document review in Sony English production in BegControl range SEL-DOJE-000000902 - SEL-DOJE-000001045. Documents were continuation of Aki Hasegawa Microsoft Office contacts in 2007 time frame.
07/18/14	Lendzion, Lauren	(SA)	7	Document Review	7.00	350	2,450.00	Finish coding first batch of documents (travel and expense reports for S Jaska). Draft Batch Memo and send to J. Verducci.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/21/14	Cho, Grace	(SA)	7	Document Review	6.00	350	2,100.00	Document review of Sony English production in BegControl range SEL-DOJE-000001046 - SEL-DOJE-000001267. Documents included 2006 resumes for Executive Assistants, 2006 meeting calendars for internal meetings, meetings with Dell, Motorola. SEL-DOJE-000001550 - SEL-DOJE-000001583.
07/23/14	Cho, Grace	(SA)	7	Document Review	7.50	350	2,625.00	Perform document review of Sony English production in BegControl range SEL-DOJE-000001589 - SEL-DOJE-000002032 - Hasegawa Microsoft Office calendar items (2005-2006) and contacts (2003-2006).
07/25/14	Cho, Grace	(SA)	7	Document Review	3.20	350	1,120.00	Continue with document review of Hasegawa Microsoft Office calendar and contacts items in BegControl range SEL-DOJE-000002033 - SEL-DOJE-000002101 in Sony English database.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
07/28/14	Cho, Grace	(SA)	7	Document Review	7.70	350	2,695.00	Continue relevancy and depo prep review in Sony English production in bates range SONY-LIB-000049033 - SONY-LIB-000050212. Documents consisted of handwritten notebooks, some by Marcel van den Bogert, and some in Aki Hasegawa custodian files.
07/29/14	Lendzion, Lauren	(SA)	7	Document Review	6.00	350	2,100.00	Review of Sony documents-custodian Aki Hasegawa.
07/30/14	Cho, Grace	(SA)	7	Document Review	9.00	350	3,150.00	Review and code Sony English documents in Bates range SONY-LIB-000050213 - SONY-LIB-000050642; SONY-LIB-000050747 - SONY-LIB-000050954. Documents seen were Steve Jaska expense reports and Aki Hasegawa calendar items.
07/30/14	Lendzion, Lauren	(SA)	7	Document Review	7.50	350	2,625.00	Review of Sony documents-custodian Aki Hasegawa (mostly calendar entries).
07/31/14	Lendzion, Lauren	(SA)	7	Document Review	7.50	350	2,625.00	Review of Sony documents-custodian Aki Hasegawa (mostly calendar entries).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
08/01/14	Cho, Grace	(SA)	7	Document Review	7.00	350	2,450.00	Continue coding and depo prep attorney notes for documents in Sony English bates range SONY-LIB-000050955 - SONY-LIB-000050975; SONY-LIB-000051082 - SONY-LIB-000051215; and BegControl range SEL-DOJE-000001761-SEL-DOJE-000002140 - documents are Aki Hasegawa custodial docs containing Microsoft Office contacts and calendar items.
08/01/14	Lendzion, Lauren	(SA)	7	Document Review	6.50	350	2,275.00	Review and coding of documents in Catalyst for Sony custodian Aki Hasegawa.
08/05/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Document review, relevancy coding and depo prep attorney notes in Sony English database for BegControl ranges SEL-DOJE-000002141 - SEL-DOJE-000002342; SEL-DOJE-000002474 - SEL-DOJE-000002590 - Aki Hasegawa 2006 Microsoft Office contacts.
08/06/14	Lendzion, Lauren	(SA)	7	Document Review	6.70	350	2,345.00	Review and coding of Sony documents in Catalyst (mostly contact information).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
08/07/14	Cho, Grace	(SA)	7	Document Review	9.00	350	3,150.00	Continue relevancy review, issue spotting and depo prep notes in Sony English production BegControl range SEL-DOJE-000002591 - SEL-DOJE-000002907 - Aki Hasegawa custodial Microsoft outlook schedule in 2007 time frame.
08/07/14	Lendzion, Lauren	(SA)	7	Document Review	4.50	350	1,575.00	Review and coding of Sony documents in Catalyst including contact documents in Microsoft office for connections.
08/08/14	Cho, Grace	(SA)	7	Document Review	4.70	350	1,645.00	Relevancy review, coding and attorney notes for depo prep in Sony Enlgish database BegControl range SEL-DOJE-000002908 - SEL-DOJE-000002936; SEL-DOJE-000003372 - SEL-DOJE-000003502 - Aki Hasegawa Microcsoft Outlook contacts for 2007.
08/11/14	Cho, Grace	(SA)	7	Document Review	6.70	350	2,345.00	Perform review of Sony English production in BegControl range SEL-DOJE-000003615 - SEL-DOJE-000003714; SEL-DOJE-000004963 - SEL-DOJE-000005075 - Jack Hamilton custodial documents - Microsoft Outlook Calendar items in 2002.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
08/13/14	Cho, Grace	(SA)	7	Document Review	8.20	350	2,870.00	Continue review and issue tagging of English documents produced by Sony in BegControl range SEL-DOJE-000005363 - SEL-DOJE-000005540; SEL-DOJE-000007316 - SEL-DOJE-000007463 - Jack Hamilton Microsoft Office calendar items in 2003.
08/13/14	Lendzion, Lauren	(SA)	7	Document Review	4.00	350	1,400.00	Review and coding of Sony custodian Chameed Haudhury documents (mostly contact information).
08/14/14	Lendzion, Lauren	(SA)	7	Document Review	6.20	350	2,170.00	Conference call with team re: assignments going forward, any questions, doc review protocol (1.2); continue review of Sony documents for custodian Chaudhury Hameed (contact information) (4.9) and send J Verducci batch memos (.1).
08/15/14	Cho, Grace	(SA)	7	Document Review	2.70	350	945.00	Document review and issue determination of Sony English production in BegControl range SEL-DOJE-000007650 - SEL-DOJE-000007749 - documents were from Hameed Chaudhury custodial Microsoft Office calendar items in 2001.
08/18/14	Lendzion, Lauren	(SA)	7	Document Review	7.00	350	2,450.00	Review and coding of Sony documents- send email to J. Verducci re: number of hours

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
								spent on project.
08/19/14	Cho, Grace	(SA)	7	Document Review	9.50	350	3,325.00	Continue with review and coding of documents in Sony English database, BegControl range SEL-DOJE-000008589 - SEL-DOJE-000008691; SEL-DOJE-000010573 - SEL-DOJE-000010732 - documents consisted of Hameed Chaudhury custodial Microsoft Outlook contacts in 2002-2003 time frame.
08/21/14	Cho, Grace	(SA)	7	Document Review	8.00	350	2,800.00	Continue relevancy review of documents in Sony English database, BegControl ranges: SEL-DOJE-000011026 - SEL-DOJE-000011146; SEL-DOJE-000012562 - SEL-DOJE-000012697 - Tomoya Hayakawa custodial Microsoft Office contacts in 2009 time frame.
08/21/14	Lendzion, Lauren	(SA)	7	Document Review	3.00	350	1,050.00	Review and code documents for custodian Chauhury Hameed with Sony (contacts); (1.0) draft and send Hot document memo to J Verducci (2.0).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
08/25/14	Cho, Grace	(SA)	7	Document Review	4.00	350	1,400.00	Finish review of checked out batch in Sony English database, bates range: SONY-LIB-000021431 - SONY-LIB-000021620 - Steve Jaska custodial documents consisting of Microsoft calendar items from 2007.
08/25/14	Lendzion, Lauren	(SA)	7	Document Review	7.50	350	2,625.00	Review and coding of documents in Catalyst- (custodians Chaudhury Hameed and Greg King) mostly contact information.
09/30/14	Lendzion, Lauren	(SA)	7	Document Review	8.00	350	2,800.00	Conference call with team to discuss review of documents, start review of Sony Batch (custodian Greg King)- irrelevant outlook entries.
10/01/14	Lendzion, Lauren	(SA)	7	Document Review	4.00	350	1,400.00	Review and coding of McCaul documents- primarily phone numbers and contact information.
10/08/14	Lendzion, Lauren	(SA)	7	Document Review	7.20	350	2,520.00	Coding of documents for custodian C. Bourassa, mostly expense reports, receipts and invoices.
10/30/14	Cho, Grace	(SA)	7	Document Review	1.50	350	525.00	Review and draft emails to and from Ronnie Spiegel, Xan Bernay, and Michael Lewis regarding status of document review and Catalyst usage. (1) Review revised Document Review Manual (.5).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
10/31/14	Cho, Grace	(SA)	7	Document Review	4.50	350	1,575.00	Begin document review of documents in Sony English database. Document seen included purchase orders and transactional data in 2006.
11/04/14	Cho, Grace	(SA)	7	Document Review	0.50	350	175.00	Batteries conference call discussing new coding instructions and review discussion.
11/07/14	Cho, Grace	(SA)	7	Document Review	5.00	350	1,750.00	Continue document review, issue tagging and attorney notes for documents in Sony English database - documents seen included purchase orders (2006), invoices (2006), and transactional data spreadsheets (2006).
11/14/14	Cho, Grace	(SA)	7	Document Review	5.00	350	1,750.00	Review documents in Catalyst Sony English database, identify issues and draft attorney notes. Documents seen included 2009 Sony emails with customers (Dell and Apple), discussions regarding packers, and pricing.
11/18/14	Cho, Grace	(SA)	7	Document Review	0.50	350	175.00	Weekly Batteries review call regarding issues and tagging.
11/21/14	Cho, Grace	(SA)	7	Document Review	5.50	350	1,925.00	Finish review of documents in Sony English database and begin review of documents in Panasonic English database; identify issues and draft deposition notes.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
12/09/14	Cho, Grace	(SA)	7	Document Review	0.50	350	175.00	Weekly conference call regarding document review, tagging and attorney notes.
12/12/14	Cho, Grace	(SA)	7	Document Review	3.20	350	1,120.00	Continue documents review, issues tagging and attorney notes for documents in Panasonic database.
12/16/14	Cho, Grace	(SA)	7	Document Review	0.70	350	245.00	Attend weekly conference call regarding document review, issues tagging and attorney notes.
12/19/14	Cho, Grace	(SA)	7	Document Review	7.50	350	2,625.00	Detailed review of documents in Panasonic English database, issue tagging and draft attorney notes. Documents seen included Panasonic meetings with clients in 2009 time frame, and client pricing requests.
12/24/14	Cho, Grace	(SA)	7	Document Review	4.00	350	1,400.00	Review documents in Panasonic English database, issue spotting and attorney notes in first tier review. Documents seen were Panasonic meeting summaries and emails with clients such as HP and B & D.
01/06/15	Cho, Grace	(SA)	7	Document Review	0.50	350	175.00	Weekly conference call with Ronnie Spiegel and all reviewers regarding document review coding issues and progress updates.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
01/07/15	Cho, Grace	(SA)	7	Document Review	3.70	350	1,295.00	Finish Panasonic English document review, tagging and attorney notes with documents containing pricing negotiation emails with clients HP and BTI.
01/09/15	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.20	690	828.00	Follow up on status of discovery review with Grace and email to lead counsel re same.
01/12/15	Kopko, Christina	(PL)	11	Litigation Strategy, Analysis & Case Management	4.00	295	1,180.00	Pull and organize motion to dismiss briefing re second motion to dismiss, review docket for important briefing and send to Xan Bernay in electronic format – send with index of docs.
01/13/15	Cho, Grace	(SA)	7	Document Review	0.50	350	175.00	Weekly document review call with Ronnie Spiegel and all reviewers discussing certain issues tags, production update, and housekeeping items.
01/16/15	Cho, Grace	(SA)	7	Document Review	7.70	350	2,695.00	Review of documents in Sony English database, issue spotting and coding, draft attorney notes. Documents consisted of travel expense reports, monthly field return data, and customer orders.
01/20/15	Cho, Grace	(SA)	7	Document Review	0.20	350	70.00	Attend weekly review call with Ronnie Spiegel regarding update on review and review issues.

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
01/26/15	Cho, Grace	(SA)	7	Document Review	1.70	350	595.00	Finish review of Sony English documents consisting of expense reports, outlook appointments, and communications with clients.
05/04/15	Kopko, Christina	(PL)	3	Drafting Discovery Answers/Responses	0.20	295	59.00	Pull docket and recent orders and status reports for CAM to prep for call (.1); [redacted]
05/28/15	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.50	690	1,035.00	[redacted]
01/14/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	3.00	715	2,145.00	Email co-counsel re: verification of interrogatories (.3); [redacted]
02/01/16	Bernay, Alexandra	(P)	5	Deposition Defending	1.00	715	715.00	[redacted]
02/10/16	Bernay, Alexandra	(P)	5	Deposition Defending	1.50	715	1,072.50	[redacted]
02/10/16	Medici, Carmen	(A)	5	Deposition Defending	1.50	545	817.50	Discuss with ASB issues related to documents and upcoming deposition of class rep.
02/16/16	Bernay, Alexandra	(P)	5	Deposition Defending	2.00	715	1,430.00	[redacted]
02/16/16	Medici, Carmen	(A)	5	Deposition Defending	2.00	545	1,090.00	[redacted]
02/26/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.50	715	1,072.50	[redacted] (1); discuss same with Carmen Medici (.5).

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
02/26/16	Medici, Carmen	(A)	5	Deposition Defending	1.00	545	545.00	[redacted] look at history.
03/03/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	2.50	715	1,787.50	[redacted]
03/03/16	Medici, Carmen	(A)	5	Deposition Defending	0.50	545	272.50	Talk to Xan about upcoming issue with [redacted] production of docs.
03/14/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	2.00	715	1,430.00	[redacted]
03/14/16	Medici, Carmen	(A)	5	Deposition Defending	2.00	545	1,090.00	[redacted]
03/16/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	2.70	715	1,930.50	[redacted]
03/28/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	2.50	715	1,787.50	Emails with defense counsel re: discovery responses.
03/28/16	Medici, Carmen	(A)	5	Deposition Defending	0.50	545	272.50	Read emails with defense counsel re: discovery responses for deposition prep.
03/30/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.50	715	1,072.50	[redacted]
03/30/16	Medici, Carmen	(A)	5	Deposition Defending	1.50	545	817.50	[redacted]
04/01/16	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.00	715	715.00	[redacted]

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
04/01/16	Medici, Carmen	(A)	11	Litigation Strategy, Analysis & Case Management	1.00	545	545.00	[redacted]
04/08/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.50	715	1,072.50	[redacted]
04/08/16	Medici, Carmen	(A)	5	Deposition Defending	6.40	545	3,488.00	Prepared for [redacted] depo by gathering and reviewing correspondence and discovery collected from [redacted]; travel to prep. for [redacted] w/[redacted] and KKP and prep. for depo (6).
04/11/16	Medici, Carmen	(A)	5	Deposition Defending	2.50	545	1,362.50	Prepare for [redacted] depo.
04/12/16	Medici, Carmen	(A)	5	Deposition Defending	3.00	545	1,635.00	Review materials in advance of [redacted] depo.
04/13/16	Medici, Carmen	(A)	5	Deposition Defending	10.90	545	5,940.50	Prepare for and defend [redacted] depo; discuss issues w/ASB and KKP afterwards for follow up (9); travel home from [redacted] depo (1.9).
04/14/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	0.70	715	500.50	Confer re: deposition of client [redacted] with Carmen Medici.
04/14/16	Medici, Carmen	(A)	5	Deposition Defending	0.50	545	272.50	Confer with Xan re: deposition of [redacted]
04/24/16	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	3.50	715	2,502.50	[redacted]

Date	Name	Title	Code	Category Name	Hours	Rate	Amount	Narrative
05/27/16	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.50	715	1,072.50	Email with lead counsel re [redacted]
05/31/16	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.00	715	715.00	[redacted]
05/31/16	Medici, Carmen	(A)	11	Litigation Strategy, Analysis & Case Management	1.00	545	545.00	[redacted]
06/01/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.20	715	858.00	[redacted]
06/02/16	Bernay, Alexandra	(P)	3	Drafting Discovery Answers/Responses	1.00	715	715.00	[redacted]
06/15/16	Medici, Carmen	(A)	3	Drafting Discovery Answers/Responses	0.60	545	327.00	Gathered and produced discovery [redacted] correspondence re same.
06/17/16	Bernay, Alexandra	(P)	11	Litigation Strategy, Analysis & Case Management	1.00	715	715.00	[redacted] review same; send same.
06/23/16	Horstman, Natalee J.	(PL)	12	Negotiating Settlements	0.50	295	147.50	Calculating due dates from the preliminary approval order.
11/02/16	Wallbrett, Michele M.	(PL)	1	Investigations, Factual Research	1.00	295	295.00	Research – pull case docket, review case status – save and forward information.
	TOTAL				**623.40**		**$246,723.00**	

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
ROBBINS GELLER RUDMAN & DOWD LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	80.00
Litigation Assessment	-
Court Fees (Filing, etc.)	350.00
Document Production	-
Experts/Consultants	-
Federal Express	-
Transcripts (Hearing, Deposition, etc.)	-
Investigation	-
Lexis/Westlaw	162.00
Messenger/Delivery	147.05
Photocopies – In House ($0.15 per copy)	52.50
Photocopies – Outside	-
Postage	152.89
Service of Process	-
Supplies	-
Telephone/Telecopier	29.35
Travel	2,125.40
Miscellaneous	-
TOTAL:	**$ 3,099.19**

EXHIBIT 56

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420 **DECLARATION OF JASON H. KIM IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS**
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	

I, Jason H. Kim, declare:

1. I am a partner of Schneider Wallace Cottrell Konecky Wotkyns, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses Submitted for *In Camera* Review. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to KCN Services LLC ("KCN") and as counsel for IPPs throughout the course of this litigation. The background and experience of Schneider Wallace Cottrell Konecky Wotkyns and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Schneider Wallace Cottrell Konecky Wotkyns performed the following work: (a) monitored the various complaints to ensure that KCN's claims, as the sole representative of the Hawaii indirect purchaser class, were properly asserted; (b) worked closely with KCN and lead counsel to respond to written discovery requests to KCN; and (c) followed up on various meet-and-confer agreements with respect to KCN.

5. Attached hereto as **Exhibit B** is a billing summary of Schneider Wallace Cottrell Konecky Wotkyns' total hours and lodestar, computed at current rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Schneider Wallace Cottrell Konecky Wotkyns during this period of time was 6.8, with a corresponding lodestar of $ 5,100. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This

summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Schneider Wallace Cottrell Konecky Wotkyns.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Schneider Wallace Cottrell Konecky Wotkyns has incurred during the course of this litigation. Schneider Wallace Cottrell Konecky Wotkyns expended a total of $526 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Schneider Wallace Cottrell Konecky Wotkyns on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Schneider Wallace Cottrell Konecky Wotkyns in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 25, 2017 at Los Angeles, California.

/s/ Jason H. Kim

Jason H. Kim

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS LLP – FIRM PROFILE

Schneider Wallace Cottrell Konecky Wotkyns ("SWCKW") is one of the nation's premier plaintiffs' law firms. A sixteen-lawyer firm, SWCKW is also one of the largest plaintiffs' law firms in the western United States.

With offices in California, Texas and Arizona, SWCKW and its attorneys have litigated in nearly every state in the country. In most of these cases, the firm has served as Lead or Co-Lead Counsel.

SWCKW's clients have enjoyed the firm's record of success. The firm has for a long time and successfully represented clients against the largest corporations in the country. The firm has won verdicts and procured settlements collectively worth hundreds of millions of dollars.

SWCKW has a thriving class action practice representing workers, consumers and investors. At the same time, the firm represents institutional clients such as private investment funds, community and regional banks, Fortune 100 insurance companies, cities, public financing districts, hospitals, and educational institutions as plaintiffs.

In carrying out its mission to help its clients combat large-scale injustice, unfairness, and other wrongful conduct, SWCKW provides a level of sophistication and service traditionally available only to large corporate defendants. The firm has particular expertise in cases involving financial services fraud, antitrust violations, and other complex litigation, among other practice areas. SWCKW and its attorneys have litigated hundreds of such cases, including the following:

- *In re Cox Enterprises Inc., Set-Top Cable Television Box Antitrust Litigation,* (pending): Obtained class certification and appointed class counsel in this consolidated antitrust putative class action alleging that one of the nation's largest cable providers impermissibly tied sales of set-top boxes to sales of premium cable services.

- *McCananey v. GlaxoSmithKline, LLC* (pending): Appointed steering committee member for interim class counsel in this ongoing antitrust putative class action alleging that the defendants engaged in an illegal conspiracy to delay the entry of generic versions of pharmaceuticals resulting in higher prices for consumers and health care payors.

- *Rosa v. Morrison Homes*: Statewide construction-defect case, alleging that Morrison Homes failed to build homes in compliance with applicable laws, resulting in a $6 million settlement.

- *Lopez v. SFUSD*: Disability access class action, resulting in a judgment that required defendant to implement remedies valued at more than $300 million.

- *Satchell v. FedEx Express, Inc.*: Class action on behalf of approximately 20,000 current and former employees of FedEx, resulting in a $54.9 million settlement.

- *Holliman v. Kaiser Foundation Health Plan*: Claims on behalf of Kaiser employees, resulting in a $9 million settlement.

- *National Federation of the Blind v. Target Corporation*: Nationwide lawsuit against Target, resulting in broad injunctive relief and $6 million in damages, which is the largest damages fund in any lawsuit brought on behalf of blind plaintiffs.

- *Labrador v. Seattle Mortgage Co*: Statewide consumer fraud case alleging that the defendant systematically violated the federal reverse mortgage program consumer protection regulations by charging improper loan-related fees, resulting in a $4 million settlement.

SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS LLP
ATTORNEY PROFILES

SWCKW's attorneys are passionately devoted to seeking justice for their clients. The firm's attorneys are nationally recognized experts—winning groundbreaking cases, obtaining record judgments, and, in the process, garnering praise from their peers, courts and clients. The attorneys below, among others, will work on this matter:

Todd M. Schneider – Mr. Schneider founded the firm in 1993. Having received his J.D. degree in 1990, Mr. Schneider has spent his entire career representing plaintiffs in complex litigation. He has litigated cases successfully around the country, in both trial and appellate courts. He recently argued a case in the United States Supreme Court, and he has tried numerous consumer class actions to verdict.

Mr. Schneider is a national leader in the plaintiff's bar. Named by his peers as a Trial Lawyer of the Year in California and a two-time finalist for Consumer Attorney of the Year, he is past President and serves on the Board of Directors of the San Francisco Trial Lawyers Association, and has served on the Board of Governors and was the Vice President of the Consumer Attorneys of California.

Mr. Schneider is a frequent lecturer and regularly appears as a panelist at continuing legal education seminars. For each year that the list has been published, Mr. Schneider was been named a Super Lawyer in the area of "class actions and mass torts" by Northern California *Super Lawyers* magazine.

Jason H. Kim – Mr. Kim graduated *magna cum laude* from Harvard Law School and Phi Beta Kappa from Harvard College. Prior to joining SWCKW, he was an associate and counsel at O'Melveny & Myers LLP in Los Angeles and Alston Hunt Floyd & Ing in Honolulu, Hawai`i. He also served as a Deputy Prosecuting Attorney for the City and County of Honolulu.

Mr. Kim represents plaintiffs in complex civil litigation, including class actions and actions against financial institutions. He has substantial trial experience in securities fraud, health care, and civil rights matters and has argued several appeals before the Ninth Circuit. He has served as class counsel in several class actions against the State of Hawai`i to vindicate the rights of disabled individuals, public benefit recipients, and public housing tenants that led to substantial settlements. He is also the co-author of the Hawai'i section of the American Bar Association's Practitioner's Guide to Class Actions.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- SUMMARY CURRENT RATES

Firm Name: Schneider Wallace Cottrell Konecky Wotkyns

Reporting Period:

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Jason Kim (P) 2017			4.60			0.70					1.50				6.80	$750.00	$5,100.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
SUB-TOTAL	**0.00**	**0.00**	**4.60**	**0.00**	**0.00**	**0.70**	**0.00**	**0.00**	**0.00**	**0.00**	**1.50**	**0.00**	**0.00**	**0.00**	**6.80**	**$750.00**	**$5,100.00**		
NON-ATTORNEYS																			
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
															0.00	$0.00	$0.00		
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**$0.00**	**$0.00**		
GRAND TOTAL:	**0.00**	**0.00**	**4.60**	**0.00**	**0.00**	**0.70**	**0.00**	**0.00**	**0.00**	**0.00**	**1.50**	**0.00**	**0.00**	**0.00**	**6.80**	**$750.00**	**$5,100.00**		

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Jason H. Kim	1/1/13 – 12/31/16	$650
Jason H. Kim	1/1/17 – present	$750
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

TIME RECORD FOR SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS

Lithium Ion Batteries Antitrust Litigation

No. 13-MD-02420 YGR (DMR)

Timekeeper	Date	Duration	Description	Hourly Rate	Code	Total
JHK	7/24/13	.30	Email to J. Jasnoch re inclusion of [redacted] in consolidated indirect purchaser complaint	$750(current)	11	$225
JHK	8/17/13	.30	Review court order re administrative closure of [redacted] action and email to J. Jasnoch re same	$750 (current)	11	$225
JHK	8/22/13	.20	Review and reply to email from J. Jasnoch re inclusion of [redacted] in consolidated indirect purchaser complaint	$750 (current)	11	$150
JHK	6/6/14	.50	Review and reply to email from J. Anderson re termination of complaint and review docket re same	$750 (current)	11	$375
JHK	6/9/14	.20	Review and reply to email from J. Anderson re status of complaint	$750 (current)	11	$150
JHK	4/25/15	.30	Review discovery requests to [redacted]	$750 (current)	3	$225
JHK	4/30/15	.20	Emails to J. Jasnoch and [redacted]	$750 (current)	3	$150

			scheduling conference call to discuss discovery responses			
JHK	5/1/15	1.50	Prepare for and attend conference call with J. Jasnoch and [redacted] re response to requests for production	$750 (current)	3	$1,125
JHK	5/8/15	.30	Review and reply to email from J. Jasnoch re possession of products and email to client re same	$750 (current)	3	$225
JHK	5/9/15	.20	Review email from [redacted] re photographs of products and email to J. Jasnoch re same	$750 (current)	3	$150
JHK	5/13/15	.30	Review and comment on draft [redacted] interrogatory responses	$750 (current)	3	$225
JHK	5/22/15	.10	Email to J. Jasnoch re comments and questions on draft [redacted] discovery responses	$750 (current)	3	$75
JHK	5/26/15	.40	Revise and finalize [redacted] interrogatory responses and [redacted] and co-counsel re same	$750 (current)	3	$300
JHK	9/15/15	.80	Review and reply to emails from J. Jasnoch re information to obtain from [redacted]	$750 (current)	3	$600

			same			
JHK	9/28/15	.20	[redacted]	$750 (current)	3	$150
JHK	11/18/15	.30	Review supplemental interrogatory response from [redacted] and J. Jasnoch re same	$750 (current)	3	$225
JHK	3/11/16	.30	Review email from K. Pachman and call with D. Lambrinos re verifications from [redacted]	$750 (current)	6	$225
JHK	3/14/16	.40	[redacted]	$750 (current)	6	$300
TOTALS		6.8		$750 (current)		$5,100

EXHIBIT E

EXPENSE RECORD FOR SCHNEIDER WALLACE COTTRELL KONECKY WOTKYNS

Lithium Ion Batteries Antitrust Litigation

No. 13-MD-02420 YGR (DMR)

Payee	Date	Description	Amount
USDC Hawaii	3/12/13	Filing fee	$372
USDC Hawaii	4/24/13	Fee by court for certified copies of complaint for service	$154
Total			$526

EXHIBIT 57

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF WILLEM F. JONCKHEER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SCHUBERT JONCKHEER & KOLBE LLP**

I, Willem F. Jonckheer, declare:

1. I am a partner of Schubert Jonckheer & Kolbe LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to plaintiff Kathy Knowles and as counsel for IPPs throughout the course of this litigation. The background and experience of my firm and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

3. Schubert Jonckheer & Kolbe LLP has prosecuted this litigation solely on a contingent-fee basis, and has been at risk that it would not receive any compensation for prosecuting claims against the defendants. While my firm devoted its time and resources to this matter, it has foregone other legal work for which it would have been compensated.

4. During the pendency of the litigation, Schubert Jonckheer & Kolbe LLP performed the following work: communicating with our client Kathy Knowles; communicating with lead counsel; reviewing discovery requests; drafting and reviewing discovery responses; responding to inquiries regarding discovery; reviewing pleadings and court orders as necessary.

5. Attached hereto as **Exhibit B** is a billing summary of Schubert Jonckheer & Kolbe LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Schubert Jonckheer & Kolbe LLP during this period of time was 20.3 hours, with a corresponding lodestar based on current rates of $14,550.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Schubert Jonckheer & Kolbe LLP has incurred during the course of this litigation. Schubert Jonckheer & Kolbe LLP expended a total of $267.64 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Schubert Jonckheer & Kolbe LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Schubert Jonckheer & Kolbe LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

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

/s/ Willem F. Jonckheer

Willem F. Jonckheer

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

SCHUBERT JONCKHEER & KOLBE LLP

Together with its predecessor firms, Schubert Jonckheer & Kolbe LLP has been in operation for over thirty-five years. In addition to prosecuting cases in California federal and state courts, the firm has been actively involved in securities, antitrust, unfair competition, and employment class actions throughout the United States. Schubert Jonckheer & Kolbe has served as Lead Counsel or Co-Lead Counsel in class actions and shareholder derivative actions that have produced recoveries valued at over $850 million.

- ***Tucker v. Scrushy***, No. CV-02-5212 (Ala. Cir., Jefferson Cty.). Co-Lead Counsel in shareholder derivative action on behalf of HealthSouth Corporation alleging breaches of fiduciary duty and insider trading arising from a restatement of financial results. Plaintiffs won partial summary judgment against former CEO Richard Scrushy for restitution to HealthSouth of $47.8 million. Plaintiffs also settled HealthSouth's claims against additional HealthSouth directors and officers for $100 million and against its investment banker for an additional $133 million. At trial against Mr. Scrushy on additional claims, Plaintiffs obtained a $2.9 billion judgment, which was later upheld by the Alabama Supreme Court.

- ***In re Google AdWords Litigation***, No. 08-CV-3369-EJD (N.D. Cal.). Lead Counsel for nationwide class of advertisers alleging Google placed their ads on low-quality parked domains and error pages in violation of California's false advertising laws. We obtained a $22.5 million settlement on behalf of over one million class members, which is pending final approval in the Northern District of California.

- ***Poertner v. The Gillette Company***, No. 12-CV-803 (M.D. Fla.). Co-Lead Counsel in nationwide consumer class action alleging false and misleading advertising of certain Duracell batteries regarding the batteries' longevity, in violation of various state laws. We obtained a settlement valued at approximately $50 million on behalf of approximately 7.26 million class members.

- ***In re Marsh & McLennan Companies, Inc. Derivative Litigation***, No. 753-VCS (Del. Ch.). As co-counsel, we helped obtain a $205 million settlement in a shareholder derivative action brought on behalf of Marsh & McLennan Companies ("MMC"). The complaint alleged that MMC, the world's largest insurance broker, failed to adequately disclose that it was paid commissions to steer insurance business to favored companies. When the practices were revealed, MMC paid huge fines, to the detriment of its shareholders.

- ***3M Transparent Tape Cases***, No. 00-2810-CW (N.D. Cal.). Co-Lead Counsel in nationwide antitrust class action on behalf of purchasers of 3M transparent tape. Plaintiffs claimed that 3M maintained an unlawful monopoly in the market for invisible and transparent tape designed to restrict the availability of lower-priced comparable products to consumers and maintain supracompetitive prices for its own retail products. We obtained a settlement valued at approximately $42 million.

- ***Bonneville Pacific Corporation Securities Litigation***, No. 92-C-181-S (D. Utah). Co-Lead Counsel in securities class action involving fraudulent financial statements by a power cogeneration company. We obtained settlements totaling $26 million for the class, which recovered 100% of its damages, in one of the largest securities fraud cases in Utah history. We also obtained an important decision from the Utah Supreme Court holding that plaintiffs need not plead or prove reliance under the Utah Uniform Securities Act.

- ***Qwest Communications International, Inc. Derivative Litigation***, No. 02-CV-8188 (Colo. Dist. Ct., Denver). Co-Lead Counsel in shareholder derivative action alleging breaches of fiduciary duty and insider trading arising out of the telecommunications company's earnings restatement. We obtained a $25 million settlement on the company's behalf.

- ***Pfeiffer v. Toll***, No. 4140-VCL (Del. Ch.). Primary counsel in shareholder derivative action alleging breaches of fiduciary duty and insider trading arising out of missed earnings projections. We recovered $16.25 million and obtained a key legal ruling rejecting the argument that Delaware's leading insider trading precedent should be overruled. ***Pfeiffer v. Toll***, 989 A.2d 683 (Del. Ch. 2010).

Current Court-Appointed Leadership Positions

- ***In re Google AdWords Litigation***, No. 08-CV-3369-EJD (N.D. Cal.). Lead Counsel for nationwide class of advertisers alleging Google placed their ads on low-quality parked domains and error pages in violation of California's false advertising laws.

- ***Fisher v. United States***, No. 13-CV-608-MMS (Fed. Cl.). Lead Counsel in shareholder derivative action on behalf of Fannie Mae alleging unconstitutional taking of private property against U.S. government based on net worth sweep of all profits.

- ***In re Zynga Shareholder Derivative Litigation***, No. CGC-12-522934 (Cal. Super. Ct.). Lead Counsel in shareholder derivative action alleging insider trading and breaches of fiduciary duty by certain officers and directors in connection with Zynga's IPO.

- ***In re Solar City Corporation Securities Litigation***, No. 16-cv-04686-LHK (N.D. Cal.). Co-Lead Counsel in securities class action alleging Solar City made false and misleading statements concerning its financial projections.

- ***In re The Home Depot, Inc. Shareholder Derivative Litigation***, No. 15-CV-2999-TWT (N.D. Ga.). Co-Lead Counsel in shareholder derivative action alleging breaches of fiduciary duty against certain officers and directors concerning Home Depot data breach.

- ***Oakland Police & Fire Ret. Sys. v. Mayer Brown***, No. 15-CV-6742 (N.D. Ill.). Co-Lead Counsel for class of participants in a $1.5 billion secured term loan with GM alleging malpractice and negligence against Mayer Brown related to their role in the transaction.

ATTORNEYS

Robert C. Schubert received a B.S. degree from the New York State School of Industrial and Labor Relations at Cornell University in 1966, where he graduated first in his class. He received his J.D. *cum laude* from Harvard Law School in 1969, after which he taught law at Columbia University and Golden Gate University. He has actively practiced law at both the trial and appellate levels. He specializes in complex litigation, particularly securities and antitrust class actions and shareholder derivative suits. He is a member of the state and federal bars of California, Massachusetts, and New York. Since 1971, he has also arbitrated numerous disputes for the Federal Mediation and Conciliation Service. He is the author of several published articles and lectures on class actions at the University of California, Hastings.

Willem F. Jonckheer received his B.A. degree from Colgate University in 1990. He was awarded his J.D. degree in 1995 from the University of San Francisco School of Law. Mr. Jonckheer was a law intern with the Pacific Stock Exchange and the U.S. Securities & Exchange Commission. He was admitted to the State Bar of California in 1995.

Miranda P. Kolbe received her B.A. from Hamilton College. She was awarded her J.D. degree from the University of California at Berkeley, Boalt Hall, where she won the Prosser Prize in Civil Procedure and the Moot Court Advocacy Award. She served as an Instructor for Boalt's Legal Research and Writing class and interned at the Prison Law Office in San Quentin, California. She later served as a legal researcher in the Civil Division of the San Francisco Superior Court.

Dustin L. Schubert received his B.A. from the University of California at Berkeley in 2003. He was awarded his J.D. degree in 2007 from Vanderbilt University Law School. Mr. Schubert was admitted to the State Bar of California in 2007 and previously interned with the San Francisco Superior Court for the Hon. A. James Robertson II. Mr. Schubert has also interned for Bay Area Legal Aid.

Noah M. Schubert received his J.D. *cum laude* from the University of San Francisco School of Law in 2011, where he served as Editor-in-Chief of the USF Law Review. Mr. Schubert authored a comment titled *Replacement Justice on the U.S. Supreme Court: The Use of Temporary Justices to Resolve the Recusal Conundrum*, 46 U.S.F. L. Rev. 215 (2011), and was awarded Best Oral Argument in the Moot Court Program. Mr. Schubert received his B.A. from the University of California at Berkeley in 2003.

Kathryn Y. Schubert received her B.A. from Cornell University in 2006. She was awarded her J.D. degree from Harvard Law School in 2009, where she served as an executive editor of the Harvard International Law Journal. Ms. Schubert was admitted to the State Bar of California in 2009 and the State Bar of New York in 2012. She served as a judicial extern with the Santa Clara Superior Court for the Hon. J. Kleinberg. Ms. Schubert previously worked for Kirkland & Ellis LLP and Satterlee Stephens Burke & Burke LLP, where she represented public and private entities in corporate transactions.

EXHIBIT B

EXHIBIT B

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

Schubert Jonckheer & Kolbe LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Robert C. Schubert (P)									0.40		0.20				0.60	$900.00	$540.00
Willem F. Jonckheer (P)			1.90	2.40				2.90	4.20		3.20				14.60	$750.00	$10,950.00
Dustin L. Schubert (P)			0.20						0.50						0.70	$600.00	$420.00
*Noah M. Schubert (P)					0.30				4.10						4.40	$600.00	$2,640.00
SUB-TOTAL	0.00	0.00	2.10	2.40	0.30	0.00	0.00	2.90	9.20	0.00	3.40	0.00	0.00	0.00	20.30		$14,550.00
NON-ATTORNEYS																	
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		$0.00
GRAND TOTAL:	0.00	0.00	2.10	2.40	0.30	0.00	0.00	2.90	9.20	0.00	3.40	0.00	0.00	0.00	20.30		$14,550.00

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Schubert Jonckheer & Kolbe LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Robert C. Schubert (P)	2013 and 2014	$850.00
Willem F. Jonckheer (P)	2013 and 2014	$700.00
Willem F. Jonckheer (P)	2015 and 2016	$750.00
Dustin L. Schubert (P)	2014	$500.00
Dustin L. Schubert (P)	2015	$550.00
Noah M. Schubert (P)	2013	$350.00
Noah M. Schubert (P)	2014	$400.00
Noah M. Schubert (P)	2015	$460.00

NON-ATTORNEYS	DATE RANGE	HOURLY RATE
N/A		

EXHIBIT D

(REDACTED)

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
SCHUBERT JONCKHEER & KOLBE LLP
Reported Hours and Lodestar
June 1, 2013 through February 28, 2017

Date	Name	Position	Task Categories	Description of Task	Rate	Billable Hours	Lodestar
06/04/13	Willem Jonckheer	P	11	Review Lithium [redacted]	$700.00	0.8	$ 560.00
06/21/13	Robert Schubert	P	11	Conference with Mr. Jonckheer regarding complaint	$850.00	0.2	$ 170.00
07/01/13	Noah Schubert	P	9	Review draft amended complaint	$350.00	2.6	$ 910.00
07/08/13	Willem Jonckheer	P	9	Review amended complaint	$700.00	0.3	$ 210.00
07/11/13	Willem Jonckheer	P	9	Review filed complaint (0.8); draft email to lead counsel re notice of association (0.7)	$700.00	1.5	$ 1,050.00
07/15/13	Willem Jonckheer	P	8	Review correspondence from liaison counsel re time keeping (0.2); draft and review notice of association (0.4)	$700.00	0.6	$ 420.00
07/19/13	Willem Jonckheer	P	8	Finalize notice of association (0.6); file (0.4)	$700.00	1.0	$ 700.00
03/21/14	Robert Schubert	P	9	Review recent class decision (0.2); conference with Mr. Jonckheer regarding same (0.2)	$850.00	0.4	$ 340.00
06/20/14	Noah Schubert	P	9	Review motion to dismiss by Panasonic on antitrust standing grounds	$400.00	1.3	$ 520.00
08/01/14	Willem Jonckheer	P	9	Review status of filings (0.1); draft email re discovery (0.1)	$700.00	0.2	$ 140.00
09/22/14	Willem Jonckheer	P	11	[redacted] (0.4); TC referring counsel J. Cowan (0.4)	$700.00	0.8	$ 560.00
09/30/14	Willem Jonckheer	P	11	Review plaintiff K. Knowles information (0.2); draft email (0.3)	$700.00	0.5	$ 350.00
10/03/14	Dustin Schubert	P	9	Review order re motion to dismiss (0.2); review press articles re same and confer w/W. Jonckheer (0.3)	$500.00	0.5	$ 250.00
10/22/14	Willem Jonckheer	P	9	Review amended complaint filing	$700.00	1.2	$ 840.00
10/24/14	Noah Schubert	P	9	Review decision on omnibus motion to dismiss	$400.00	0.2	$ 80.00

04/23/15	Willem Jonckheer	P	9	Review email from J. Prince attaching document requests and interrogatories served on plaintiff; coordinate conference call regarding same	$750.00	1.0	$ 750.00
05/08/15	Willem Jonckheer	P	3	Draft and review emails regarding extension to respond to discovery requests	$750.00	0.2	$ 150.00
06/08/15	Willem Jonckheer	P	3	Review emails from J. Prince, J. Cowan [redacted] document production	$750.00	0.5	$ 375.00
09/15/15	Willem Jonckheer	P	3	Review emails [redacted] discovery and responses	$750.00	0.3	$ 225.00
09/17/15	Willem Jonckheer	P	3	Review emails [redacted] production of information	$750.00	0.2	$ 150.00
11/09/15	Willem Jonckheer	P	3	Review discovery requests and proposed responses (0.4); emails from counsel on verification (0.3)	$750.00	0.7	$ 525.00
11/16/15	Noah Schubert	P	5	Conf. w/firm partners and associates [redacted] deposition and interrogatories	$460.00	0.3	$ 138.00
11/16/15	Dustin Schubert	P	3	Confer w/counsel [redacted] discovery issues	$550.00	0.2	$ 110.00
12/11/15	Willem Jonckheer	P	4	Telephone J. Cowan [redacted] deposition	$750.00	0.2	$ 150.00
12/16/15	Willem Jonckheer	P	4	Telephone call with plaintiffs' counsel re scheduling of [redacted] deposition	$750.00	0.5	$ 375.00
12/17/15	Willem Jonckheer	P	4	Draft emails to referring counsel and plaintiffs' counsel re depo scheduling	$750.00	0.3	$ 225.00
12/23/15	Willem Jonckheer	P	4	[redacted]	$750.00	0.2	$ 150.00
12/29/15	Willem Jonckheer	P	4	[redacted] (0.5) research rules on written depositions (0.5)	$750.00	1.0	$ 750.00
12/30/15	Willem Jonckheer	P	4	Review email from plaintiffs' counsel proposing written deposition (0.1); forward same (0.1)	$750.00	0.2	$ 150.00
01/22/16	Willem Jonckheer	P	8	Review motion to amend complaint as it relates to [redacted] (0.4); draft email to J. Cowan re client issues (0.4)	$750.00	0.8	$ 600.00
01/25/16	Willem Jonckheer	P	8	Telephone call with Kathy Hoek [redacted] withdrawal (0.3); draft email to referring counsel (0.2)	$750.00	0.5	$ 375.00
02/10/16	Willem Jonckheer	P	11	[redacted]	$750.00	0.1	$ 75.00

03/14/16	Willem Jonckheer	P	11	Telephone call with lead counsel twice [redacted] discovery responses (0.2); TC J. Cowan (0.2); draft emails re same (0.3)	$750.00	0.7	$ 525.00
03/15/16	Willem Jonckheer	P	11	Draft email re [redacted]	$750.00	0.3	$ 225.00
TOTAL						20.3	$ 13,123.00

Position:

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

Task Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
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(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
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EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
SCHUBERT JONCKHEER & KOLBE LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	$0.00
Litigation Assessment	$0.00
Court Fees (Filing, etc.)	$0.00
Document Production	$0.00
Experts/Consultants	$0.00
Federal Express	$0.00
Transcripts (Hearing, Deposition, etc.)	$0.00
Investigation	$0.00
Lexis/Westlaw	$267.64
Messenger/Delivery	$0.00
Photocopies – In House (capped at $0.20 per copy)	$0.00
Photocopies – Outside	$0.00
Postage	$0.00
Service of Process	$0.00
Supplies	$0.00
Telephone/Telecopier	$0.00
Travel	$0.00
Miscellaneous	$0.00
TOTAL:	**$267.64**

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DARYL F. SCOTT IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SCOTT+SCOTT ATTORNEYS AT LAW LLP**

I, DARYL F. SCOTT, declare:

1. I am a member of Scott+Scott Attorneys at Law LLP ("Scott+Scott"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representatives, Linda Lincoln and Donna Shawn, and as counsel for IPPs throughout the course of this litigation as a member of the Indirect Purchaser Plaintiffs' Steering Committee. *See* ECF No. 229. The background and experience of Scott+Scott and its attorneys are summarized in the *curriculum vitae* attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Scott+Scott performed the following work: (i) conferring with the class representatives represented by Scott+Scott and keeping them apprised of the status of the litigation; (ii) working with several additional class representatives in responding to requests for production of documents and interrogatories; (iii) working with class representatives to collect and produce responsive discovery materials to Defendants; (iv) preparing for and defending multiple class-representative depositions; (v) conferring with class representatives regarding the proposed settlements; (vi) researching and drafting an opposition to one of the Defendants' motions to dismiss; (vii) reviewing documents produced by Defendants; and (viii) performing other tasks at the direction of the co-lead counsel firms.

5. Attached hereto as **Exhibit B** is a billing summary of Scott+Scott's total hours and lodestar, reported at the firm's current billing rates, from March 1, 2017 to present. The summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at

historical billing rates. The time reported is for work assigned by Co-Lead Counsel and performed by the professional staff at my law firm.

6. A summary of work performed by Scott+Scott and the detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Daryl F. Scott in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Scott+Scott and filed on May 26, 2017. (ECF No. 1813-36.) Counsel for Plaintiffs did not, and do not, seek attorneys' fees for time billed before the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the number of hours spent by Scott+Scott since June 1, 2013 totals 1,872.5, and the lodestar totals $790,690.00.

8. Attached hereto as **Exhibit D** is a summary of the expenses and charges my firm incurred from June 1, 2013 to present, including applicable case filing fees. Scott+Scott incurred $67,104.69 in unreimbursed expenses and charges on a contingent fee-basis in the prosecution of this case on behalf of IPPs. The expenses and charges were prepared from reports, vouchers, receipts, and bank records and accurately reflect the expenses and charges incurred by Scott+Scott in this case. I have reviewed the time and expenses reported by Scott+Scott in this declaration, and I affirm that they are true and accurate.

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

Executed on April 11, 2019 at Richmond, Virginia.

/s/ Daryl F. Scott

Daryl F. Scott

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

SCOTT+SCOTT
ATTORNEYS AT LAW LLP



MISSION STATEMENT

Scott+Scott Attorneys at Law LLP ("Scott+Scott") is a nationally recognized law firm headquartered in Connecticut with offices in California, New York City, and Ohio. Scott+Scott represents individuals, businesses, public and private pension funds, and others who have suffered from corporate fraud and wrongdoing. Scott+Scott is directly responsible for recovering hundreds of millions of dollars and achieving substantial corporate governance reforms on behalf of its clients. Scott+Scott has significant expertise in complex antitrust, consumer, securities, ERISA, and civil rights litigation in both federal and state courts. Through its efforts, Scott+Scott promotes corporate social responsibility.

ANTITRUST

Scott+Scott litigates complex antitrust cases throughout the United States. Scott+Scott represents investors, business, and consumers in price-fixing, bid-rigging, monopolization, and other restraints of trade cases on both a class-wide and individual basis, helping to ensure that markets remain free, open, and competitive. With the opening of a London Office, Scott+Scott's commitment to competition now includes pursuing its clients' claims on a global basis.

Scott+Scott's class action antitrust practice includes serving as court-appointed lead counsel with the responsibility for the prosecution of class claims. Scott+Scott serves as court-appointed lead counsel in high-value antitrust class action cases, including *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (challenging bid rigging and market allocation of leveraged buyouts by private equity firms resulting in $590.5 million in settlements)); *In Re: Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) (challenging price-fixing of foreign exchange rates (over $2 billion in partial settlements negotiated)); and *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y.) (challenging price-fixing of the ISDAfix benchmark interest rate). Scott+Scott has served as court-appointed lead counsel in other cases, including *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891, No. CV 07-06542 (C.D. Cal.) (challenging price-fixing/illegal surcharge ($86 million in cash and travel voucher settlements) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 12-cv-03824 (E.D. Pa.) (challenging monopolization in the sale of name-brand pharmaceutical ($8 million settlement)).

When not serving as lead counsel, Scott+Scott has served on the executive leadership committees in numerous class action cases. Representative actions include *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 1:05-md-1720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry ($7.25 billion settlement)); *Kleen*

Products LLC v. Packaging Corporation of America, No. 1:10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products); and *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420-YGR (DMR) (N.D. Cal.) (challenging price-fixing of lithium-ion batteries).

Scott+Scott's class action antitrust experience includes serving as co-trial counsel in *In re Scrap Metal Antitrust Litigation*, 02-cv-0844-KMO (N.D. Ohio), where it helped obtain a $34.5 million jury verdict, which was subsequently affirmed by the United States Court of Appeals for the Sixth Circuit (*see In re Scrap Metal Antitrust Litigation*, 527 F.3d 517, 524 (6th Cir. 2008)), and in the consolidated bench trial in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.), and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Scott+Scott also represents large clients in opt-out antitrust litigation. Scott+Scott currently represents Eastman Kodak Company, Agfa Corporation, Agfa Graphics, N.V., and Mag Instrument, Inc. in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.). Scott+Scott previously represented publicly traded corporations, such as Parker Hannifin Corporation and PolyOne Corporation, in matters such as *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastic Additives Antitrust Litigation (No. II)*, MDL No. 1684 (E.D. Pa.).

CONSUMER RIGHTS

Scott+Scott and its attorneys have a proven track record of obtaining significant recoveries for consumers in class action cases. Scott+Scott is one of the premier advocates in the area of consumer protection law and has been appointed to a number of prominent leadership positions.

Cases where Scott+Scott has played a leading role in the area of consumer protection litigation include:

- *In re Providian Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) ($105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *The Vulcan Society, Inc. v. City of New York*, No. 07-cv-02067 (E.D.N.Y.) ($100 million settlement and significant injunctive relief was obtained for a class of black and Hispanic applicants who sought to be New York City firefighters but were denied or delayed employment due to racial discrimination);
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) ($40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts);
- *In re Target Corp. Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) ($59 million settlement achieved on behalf of financial institutions involving data breach of personal and financial information of approximately 40 million credit and debit card holders);

- *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 15-cv-02228 (N.D. Ill.) ($18 million monetary and injunctive settlement on behalf of financial institutions involving data breach of credit and debit card information);

- *Winsouth Credit Union v. Mapco Express Inc.*, Case No.: 3:14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information);

- *Gunther v. Capital One, N.A.*, No. 09-2966 (E.D.N.Y.) (a net settlement resulting in class members receiving 100% of their damages was obtained);

- *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.) ($37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);

- *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-1091 (E.D. Va.) ($7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers); and

- *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) ($6.1 settlement obtained on behalf of a class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural").

Moreover, Scott+Scott is currently serving in a leadership capacity in a number of class action consumer protection cases, including:

- *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, preliminary approval of $27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders);

- *First Choice Federal Credit Union v. The Wendy's Co.*, 2:16-cv-00506 (W.D. Pa.) (co-lead counsel, claims on behalf of financial institutions involving data breach of personal and financial information of millions of credit and debit card holders);

- *In re UnitedHealth Group PBM Litigation*, Case No. 0:16-cv-3352 (D. Minn.) (co-lead counsel, claims on behalf of plan participants involving overcharge of copayments for prescription drugs);

- *In re Cigna Corporation PBM Litigation*, Case No. 3:16-cv-1702 (D. Conn.) (Chair of Executive Committee, claims on behalf of plan participants involving overcharge of copayments for prescription drugs);

- *Midwest America Federal Credit Union v. Arby's Restaurant Group, Inc.*, 1:17-cv-00514 (N.D. Ga.) (member of Executive Committee, claims on behalf of financial institutions involving data breach of credit and debit card information); and

- *In re Herbal Supplements Marketing and Sales Practices Litigation*, MDL No. 2519 (N.D. Ill.) (claims on behalf of a class of consumers alleging major retail-chain defendants misrepresent the ingredients in store-branded herbal supplements).

SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott represents individuals and institutional investors that have suffered from stock fraud and corporate malfeasance. Scott+Scott's philosophy is simple – directors and officers should be truthful in their dealings with the public markets and honor their duties to their shareholders. Since its inception, Scott+Scott's securities and corporate governance litigation department has developed and maintained a reputation of excellence and integrity recognized by state and federal and state courts across the country. "It is this Court's position that Scott+Scott did a superlative job in its representation, which substantially benefited Ariel . . . . For the record, it should be noted that Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case . . . . They have possessed a knowledge of the issues presented and this knowledge has always been used to the benefit of all investors." *N.Y. Univ. v. Ariel Fund Ltd.*, No. 603803/08, slip. op. at 9-10 (N.Y. Sup. Ct. Feb. 22, 2010). "The quality of representation here is demonstrated, in part, by the result achieved for the class. Further, it has been this court's experience, throughout the ongoing litigation of this matter, that counsel have conducted themselves with the utmost professionalism and respect for the court and the judicial process." *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884, 2007 WL 2115592, at *5 (D. Conn. July 20, 2007).

Scott+Scott has successfully prosecuted numerous class actions under the federal securities laws, resulting in the recovery of hundreds of millions of dollars for shareholders. Representative cases prosecuted by Scott+Scott under the Securities Exchange Act of 1934 include: *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn. July 19, 2007) ($80 million settlement); *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y. July 29, 2005) ($75 million settlement); *Cornwell v. Credit Suisse Group*, No. 08-cv-03758 (S.D.N.Y. July 20, 2011) ($70 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.*, No. 02-cv-2133 (D. Conn. June 13, 2008) ($26.5 million settlement); and *St. Lucie County Fire District Firefighter's Pension Trust Fund v. Oilsands Quest Inc.*, No. 11-cv-1288-JSR (S.D.N.Y. Dec. 6, 2013) ($10.23 million settlement) ($7.85 million settlement preliminarily approved). Representative cases prosecuted by Scott+Scott under the Securities Act of 1933 include: *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash. Jan. 7, 2014) ($26 million settlement); *In re Pacific Biosciences Securities Litigation*, No.CIV509210 (Cal. Super. Ct., San Mateo County, Oct. 31, 2013) ($7.68 million settlement); *West Palm Beach Police Pension Fund v. CardioNet, Inc.*, No. 37-2010-00086836-CU-SL-CTL (Cal. Super. Ct., San Diego County, 2010) ($7.25 million settlement); *Parker v. National City Corp.*, No. CV-08-657360 (Ohio Ct. Com. Pl., Cuyahoga County, June 23, 2010) ($5.25 million settlement); and *Hamel v. GT Solar International, Inc.*, No. 217-2010-CV-05004 (N.H. Super. Ct., Merrimack County, May 10, 2011) ($10.25 million settlement).

Scott+Scott currently serves as court-appointed lead counsel in various federal securities class actions, including *Birmingham Retirement and Relief System, v. S.A.C. Capital Advisors*, No. 1:12-cv-09350 (S.D.N.Y. June 17, 2013); *In re NQ Mobile Securities Litigation*, No. 13-cv-

07608 (S.D.N.Y. April 9, 2014); *In re Conn's Inc. Securities Litigation*, No. 14-cv-00548 (S.D. Tex. June 3, 2014) and *Weston v. RCS Capital Corp.*, No. 14-10136 (S.D.N.Y., Dec. 29, 2014).

In addition to prosecuting federal securities class actions, Scott+Scott has a proven track record of handling corporate governance matters through its extensive experience litigating shareholder derivative actions. In addition, Scott+Scott has been singularly successful in its shareholder derivative appellate practice, and as a result, has been instrumental in fashioning the standards in this area of law. In *Westmoreland County Employee Retirement System v. Parkinson*, No. 12-3342 (7th Cir. Aug. 16, 2013), the Seventh Circuit clarified the parameters of demand futility in those instances where a majority of directors of a corporation are alleged to have breached the fiduciary duty of loyalty by consciously disregarding positive law. In *Cottrell v. Duke*, No. 12-3871 (8th Cir. Dec. 28, 2013), the Eighth Circuit, in a case of first impression, clarified that the *Colorado River* stay is virtually never appropriate where there are exclusive federal claims. And in *King v. Verifone Holdings, Inc.*, No. 330, 2010 (Del. Jan. 28, 2011), the Supreme Court of Delaware has clarified the availability of the Delaware Corporate Code Section 220 "books and records" demands to a shareholder whose original plenary action was dismissed without prejudice in a federal district court. Representative actions prosecuted by Scott+Scott include: *In re DaVita Healthcare Partners Derivative Litigation*, No. 13-cv-1308 (D. Colo.) (corporate governance reform valued at $100 million); *North Miami Beach General Employees Retirement Fund v. Parkinson*, No. 10C6514 (N.D. Ill.) (corporate governance valued between $50 million and $60 million); *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894-RMW (RS) (N.D. Cal. Aug. 11, 2009) ($54.9 million and corporate governance reforms); *In re Qwest Communications International, Inc.*, No. Civ. 01-RB-1451 (D. Colo. June 15, 2004) ($25 million and corporate governance reform); *Plymouth County Contributory Retirement Fund v. Hassan*, No. 08-cv-1022 (D.N.J.) (settlement of derivative claims against Merck Schering Plough and its officers and directors providing for corporate governance reforms valued between $50 million and $75 million); *Carfagno v. Schnitzer*, No. 08-cv-912-SAS (S.D.N.Y. May 18, 2009) (modification of terms of preferred securities issued to insiders valued at $8 million); and *Garcia v. Carrion*, No. 3:09-cv-01507 (D.P.R. Sept. 12, 2011) (settlement of derivative claims against the company and its officers and directors providing for corporate governance reforms valued between $10.05 million and $15.49 million).

Currently, Scott+Scott is actively prosecuting shareholder derivative actions, including *In re Bio-Rad Laboratories, Inc. Stockholder Litigation*, C.A. No. 11387 (Del. Ch. Aug. 13, 2015); *In re Tile Shop Holdings, Inc. Stockholder Derivative Litigation*, C. A. No. 108884 (Del. Ch. July 31, 2015); *West Palm Beach Fire Pension Fund v. Page*, No. 15-1334 (N.D. Cal. March 23, 2015); *In re Duke Energy Corp. Coal Ash Derivative Litigation*, C.A. No. 9682 (Del. Ch. May 21, 2014); and *In re OSI Systems, Inc. Derivative Litigation*, No. 14-2910 (C. D. Cal. April 15, 2014).

EMPLOYEE BENEFITS (ERISA)

Scott+Scott litigates complex class actions across the United States on behalf of corporate employees alleging violations of the federal Employee Retirement Income Security Act. ERISA was enacted by Congress to prevent employers from exercising improper control over retirement plan assets and requires that pension and 401(k) plan trustees, including employer corporations,

owe the highest fiduciary duties to retirement plans and their participants as to their retirement funds. Scott+Scott is committed to continuing its leadership in ERISA and related employee-retirement litigation, as well as to those employees who entrust their employers with hard-earned retirement savings. Representative recoveries by Scott+Scott include: *In re Royal Dutch/Shell Transport ERISA Litigation*, No. 2:04-cv-01398-JWB-SDW (D.N.J. Aug. 30, 2005) ($90 million settlement); *In re General Motors ERISA Litigation*, No. 2:05-cv-71085-NGE-RSW (E.D. Mich. June 5, 2008) ($37.5 million settlement); and *Rantala v. ConAgra Foods*, No. 8:05-cv-00349-LES-TDT (D. Neb.) ($4 million settlement).

CIVIL RIGHTS LITIGATION

Scott+Scott has also successfully litigated cases to enforce its clients' civil rights. In *The Vulcan Society, Inc. v. The City of New York*, No. 1:07-cv-02067-NGG-RLM (E.D.N.Y.), Scott+Scott was part of a team of lawyers representing a class of black applicants who were denied or delayed employment as New York City firefighters due to decades of racial discriminatory conduct. The district court certified the class in a post-*Walmart v. Dukes* decision, granted summary judgment against the City on both intentional discrimination and disparate impact claims, and after trial ordered broad injunctive relief, including a new examination, revision of the application procedure, and continued monitoring by a court-appointed monitor for at least 10 years. The back pay and compensatory damage award will be determined in a subsequent ruling. In *Hohider v. United Parcel Services, Inc.*, No. 2:04-cv-00363-JFC (W.D. Penn.), Scott+Scott obtained significant structural changes to UPS's Americans with Disabilities Act compliance policies and monetary awards for some individual employees in settlement of a ground-breaking case seeking nationwide class certification of UPS employees who were barred from reemployment after suffering injuries on the job.

ATTORNEY BACKGROUND AND EXPERIENCE

MELVIN SCOTT is a graduate of the University of Connecticut (B.A. 1950) and the University of Kentucky (M.A. 1953; LL.B. 1957). Mr. Scott founded the firm in 1975. He formerly practiced in Kentucky and is presently admitted to practice in Connecticut and Pennsylvania. Mr. Scott was a member of the Kentucky Law Review, where he submitted several articles for publication. He has served as an Attorney Trial Referee since the inception of the program in the State of Connecticut and is a member of the Fee Dispute Committee for New London County. Mr. Scott also formerly served as a Special Public Defender in criminal cases and as a member of the New London County Grievance Committee. Mr. Scott actively represents aggrieved parties in securities, commercial and criminal litigation and served or serves as counsel in *Irvine, et al. v. ImClone Systems, Inc.*; *Schnall v. Annuity and Life Re (Holdings) Ltd.*; *In re 360networks Class Action Securities Litigation*; *In re General Motors ERISA Litigation*, and *Hohider v. UPS*, among others.

DAVID R. SCOTT is the managing partner of Scott+Scott. He represents multinational corporations, hedge funds, and institutional investors in high-stakes complex litigation, including antitrust, commercial, and securities actions.

Mr. Scott has received widespread recognition for his antitrust work. He has been elected to Who's Who Legal: Competition 2015, 2016, and 2017 which lists the world's top antitrust lawyers who are selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015.

Mr. Scott's antitrust experience includes matters dealing with unlawful price-fixing cartels, illegal tying, and anticompetitive monopolization. Currently, Mr. Scott is lead counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, a cartel action alleging a longstanding and widespread conspiracy to manipulate the foreign exchange market, in which billions in settlements have been announced to date. He is co-lead counsel in a class action case alleging that the world's largest banks and their broker, ICAP, entered a conspiracy to manipulate ISDAfix, a financial benchmark that is tied to over $379 trillion of outstanding interest-rate swaps around the world.

Mr. Scott's previous antitrust cases have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Capital Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for $600 million. He also played a leadership role in a lawsuit accusing Visa and MasterCard of engaging in anticompetitive conduct in setting credit card and debit card acceptance fees that recently settled for a record $7.25 billion. And he was lead counsel in *Red Lion Medical Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds, against mortgaged-backed securities trustees for failing to protect investors. Such cases include *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. The Bank of New York Mellon* (MBS sponsored by Countrywide Financial Corp.), No. 1:11-cv-05459 (S.D.N.Y.); *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America* (MBS sponsored by Washington Mutual Bank), No. 1:12-cv-02865 (S.D.N.Y.); and *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association* (MBS sponsored by Bear Stearns), No. 1:11-cv-08066 (S.D.N.Y.). He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

In addition, Mr. Scott has extensive experience litigating shareholder derivative cases, achieving substantial corporate governance reforms on behalf of his clients. Representative actions include: *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894 (N.D. Cal.) (settlement obtaining $54.9 million in financial benefits for the company, including $14.6 million in cash, and corporate governance reforms to improve stock option granting procedures and internal controls, valued at more than $150 million); *In re Qwest Communications International, Inc*., No. 01-RB-1451 (D. Colo.) (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence); *Plymouth County Contributory Retirement System v. Hasan*, No. 08-1022 (D.N.J.) (settlement requiring annual reporting to the company's board where any clinical drug trial is delayed, valued at between $50 million - $75 million); *Carfagno v. Schnitzer*, No. 08-cv-0912 (S.D.N.Y.) (settlement resulting in modification of terms of preferred securities issued to insiders, valued at $8 million); and *Garcia v. Carrion*, No. 09-cv-1507 (D.P.R.) (settlement achieving reforms aimed at rectifying internal control weaknesses and improving director education in accounting and ethics, valued at between $10 million - $15 million).

Mr. Scott is frequently quoted in the press, including in publications such as *The Financial Times*, *The Guardian*, *The Daily Telegraph*, *The Wall Street Journal*, and *Law360*. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.

Mr. Scott is admitted to practice in Connecticut, New York, the United States Tax Court, and numerous United States District Courts.

Mr. Scott is a graduate of St. Lawrence University (B.A., *cum laude*, 1986), Temple University School of Law (J.D., Moot Court Board, 1989), and New York University School of Law (LLM in taxation).

CHRISTOPHER M. BURKE chairs Scott+Scott's competition practice and sets the Firm's litigation standards. Mr. Burke's principal practice is in complex antitrust litigation, particularly in the financial services industry and he has served as lead counsel in some of the world's largest

financial services antitrust matters. He currently sits as a partner in the firm's San Diego and New York offices.

Currently, Mr. Burke is co-lead counsel in *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, 13-cv-7789 (S.D.N.Y.) ($2.3 billion settlement); and *Alaska Electrical Pension Fund v. Bank of America Corporation*, 14-cv-7126 (S.D.N.Y) (ISDAfix litigation) ($500 million settlement).

Mr. Burke has previously served as co-lead counsel in *Dahl v. Bain Capital Partners*, 07-cv-12388 (D. Mass.) ($590.5 million settlement); *Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC v. Barclays Bank PLC*, 15-cv-09323 (S.D.N.Y.) ($50 million settlement); *In re Currency Conversion Antitrust Litigation*, MDL No. 1409 (S.D.N.Y.) ($336 million settlement); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.) (over $5 billion settlement); *LiPuma v. American Express Co.*, Case No. 1:04-cv-20314 (S.D. Fla.) ($90 million settlement); and was one of the trial counsel in *Schwartz v. Visa*, Case No. 822505-4 (Alameda Cty. Super. Ct.) ($780 million plaintiff's judgment after six months of trial); and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 1030 (M.D. Fla.). Mr. Burke was one of the original lawyers in the *Wholesale Elec. Antitrust* cases in California, which settled for over $1 billion.

Further, Mr. Burke was trial counsel in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.). He was also co-lead counsel for indirect purchasers in *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891 (C.D. Cal.) ($86 million settlement), and *In re Prudential Ins. Co. of America SGLI/VGLI Contract Litigation*, No. 11-md-2208 (D. Mass.) ($40 million settlement). Mr. Burke also investigated and filed the first complaint in *In re Credit Default Swaps Antitrust Litigation*, 13-md-2476 (S.D.N.Y.).

Mr. Burke frequently lectures at professional conferences and CLEs on competition matters, including litigation surrounding financial benchmarks, class-barring arbitration clauses, the effects of *Twombly* in 12(b)(6) motions, and the increasing use of experts at class certification and trial. The American Antitrust Institute ("AAI") honored Christopher Burke and Scott+Scott Attorneys at Law with an *Outstanding Antitrust Litigation Achievement in Private Law Practice* award at their 2018 Antitrust Enforcement Awards for efforts in the *ISDAfix* litigation. In 2014, he was also recognized for his exemplary work in the *Dahl v. Bain Capital Partners* matter by the AAI and has regularly been designated as a Super Lawyer by Thomson Reuters.

Mr. Burke is a graduate of The Ohio State University (B.A. 1984), William & Mary (M.A. 1988), and the University of Wisconsin (M.A. 1989; J.D. 1993; Ph.D. 1996). He has also served as an Assistant Attorney General at the Wisconsin Department of Justice and has lectured on law-related topics, including constitutional law, law and politics, and civil rights at the State University of New York at Buffalo and at the University of Wisconsin. Mr. Burke's book, *The Appearance of Equality: Racial Gerrymandering, Redistricting, and the Supreme Court* (Greenwood, 1999), examines conflicts over voting rights and political representation within the competing rhetoric of communitarian and liberal strategies of justification.

Mr. Burke is admitted to practice by the Supreme Courts of the States of California, New York, and Wisconsin, and numerous United States District Courts and Courts of Appeal.

WALTER W. NOSS serves as the managing partner for Scott+Scott's San Diego office. He practices complex federal litigation with an emphasis on prosecuting antitrust actions on both a class-wide and individual, opt-out basis.

Currently, Mr. Noss represents class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate.

Mr. Noss represented class plaintiffs in *Dahl v. Bain Capital Partners LLC*, No. 1:07-cv-12388 (D. Mass.), a case challenging collusion among private equity firms. In *Dahl*, Mr. Noss served as one of the primary litigation counsel prosecuting the case, including deposing key managing directors, drafting dispositive motions, and arguing in court in opposition to defendants' summary judgment motions. The defendants in *Dahl* settled for $590.5 million.

Mr. Noss represented the indirect purchaser class plaintiffs in *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 2:12-cv-03824 (E.D. Pa.), a case challenging monopolistic conduct known as "product hopping" by the defendants. In *Mylan*, he was appointed sole lead counsel for the indirect class, and directed their prosecution and eventual settlement of the case for $8 million.

Mr. Noss also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum. He has previously represented out-out clients in *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.), which were cases involving price-fixing by horizontal competitors in the synthetic rubber industry.

Mr. Noss has experience successfully litigating in federal civil jury trials. In April 2011, Mr. Noss served as lead trial counsel in *Novak v. Gray*, No. 8:09-cv-00880 (M.D. Fla.), winning a $4.1 million jury verdict for breach of oral contract and fraudulent inducement. In December 2009, Mr. Noss served as plaintiffs' local counsel at trial in *Lederman v. Popovich*, No. 1:07-cv-00845 (N.D. Ohio), resulting in a $1.8 million jury verdict for plaintiffs on claims of breach of fiduciary duties, conversion, and unjust enrichment. In January and February 2006, Mr. Noss assisted the trial team for *In re Scrap Metal Antitrust Litigation*, No. 1:02-cv-0844 (N.D. Ohio 2006), resulting in a $34.5 million class action plaintiffs' verdict.

Mr. Noss graduated *magna cum laude* from the University of Toledo with a Bachelor of Arts in Economics in 1997 and *with honors* from The Ohio State University College of Law in 2000. He is a member of the California, New York, and Ohio Bars. Mr. Noss is also a member of the bars of the United States District Courts for the Northern, Central, and Southern Districts of

California, the Southern District of New York, and the Northern and Southern Districts of Ohio, as well as the United States Court of Appeals for the Sixth, Ninth, and Eleventh Circuits. Prior to joining Scott+Scott in April 2004, he was an associate in the Cleveland, Ohio office of Jones Day.

KRISTEN M. ANDERSON is a partner in the firm's New York office. Ms. Anderson's practice focuses on complex and class action litigation with an emphasis on antitrust matters. Ms. Anderson is recognized as a Rising Star in the 2014-15, 2015-16, and 2016-17 editions of Super Lawyers.

A substantial portion of Ms. Anderson's practice is devoted to antitrust cases within the financial services industry. Currently, Ms. Anderson represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) and *Axiom Investment Advisors, LLC, by and through its Trustee Gildor Management LLC v. Barclays Bank PLC*, No. 15-cv-9323 (S.D.N.Y.), cases alleging misconduct in the foreign exchange market by many global financial institutions. Ms. Anderson also represented pension funds and individual investors in *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) ($590.5 million settlement), an antitrust action alleging collusion in the buyouts of large publicly traded companies by private equity firms. Ms. Anderson also served on the trial team representing certified classes of cardholders in antitrust cases challenging class action-banning arbitration clauses in credit card agreements as restraints of trade in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Ms. Anderson is an active member of the American Bar Association's Antitrust Section. She served as Vice Chair of the Antitrust Section's Trial Practice Committee and was an editor of the Committee's newsletter, Trying Antitrust. She has also served as a Vice Chair of the Antitrust Section's Books & Treatises Committee. She has been a contributing author to the Antitrust Section's *Antitrust Discovery Handbook* (2d ed.), *Joint Venture Handbook* (2d ed.), and the *2010 Annual Review of Antitrust Law Developments*. In addition, Ms. Anderson served as an editor for *Model Jury Instructions in Civil Antitrust Cases* (2016 ed.). Ms. Anderson was a co-author of an article appearing in the Fall 2014 edition of *Competition: Journal of the Antitrust and Unfair Competition Section of the State Bar of California*, entitled *The Misapplication of Associated General Contractors to Cartwright Act Claims*, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014).

Ms. Anderson is a graduate of St. Louis University (B.A. Philosophy, *summa cum laude*, 2003) and the University of California, Hastings College of the Law (J.D. 2006). During law school, Ms. Anderson served as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco. While at Hastings, Ms. Anderson also served as an extern to Justice Kathryn Mickle Werdegar of the Supreme Court of California and was the research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.

Ms. Anderson is admitted to practice in California, New York, and the District of Columbia.

JOSEPH P. GUGLIELMO is a partner in the firm's New York office and represents

institutional and individual clients in antitrust, consumer, and securities litigation in federal and state courts throughout the United States and has achieved numerous successful outcomes.

Mr. Guglielmo, along with other attorneys at Scott+Scott, was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order of over $200 million from a Bernard Madoff feeder fund. Specifically, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo serves in a leadership capacity in a number of complex antitrust, securities, and consumer actions, including: *In Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-2800 (N.D. Ga.), co-lead counsel, claims on behalf of financial institutions involving data breach of personal and financial information of approximately 150 million consumers, *In Re: Disposable Contact Lens Antitrust Litigation*, No. 3:15-md-2626 (M.D. Fla.), co-lead counsel, claims on behalf of a class of contact lens purchasers alleging violations of the antitrust laws, *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.), co-lead counsel, $27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders; *In re Cigna Corporation PBM Litigation*, No. 3:16-cv-1702 (WWE) (D. Conn.), Chair of Executive Committee, asserting RICO and ERISA claims on behalf of nationwide class of plan participants involving overcharge of copayments for prescription drugs; *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.), lead counsel, asserting claims on behalf of class of consumers alleging overcharge for medically necessary, covered prescription drugs, *Bellwether Community Credit Union v. Chipotle Mexican Grill, Inc.*, No. 1:17-cv-01102-WJM-STV (D. Colo.) co-lead counsel, on behalf of financial institutions involving data breach and the theft of the personal and financial information. Mr. Guglielmo is also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789-LGS (S.D.N.Y), which involves claims on behalf of purchasers of foreign exchange instruments alleging violations of federal antitrust laws.

Mr. Guglielmo has achieved significant victories and obtained numerous settlements for his clients. He was one of the principals involved in the litigation and settlement of *In re Managed Care Litigation*, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding $1 billion. Additional cases Mr. Guglielmo played a leading role and obtained substantial recoveries for his clients include: *Love v. Blue Cross and Blue Shield Ass'n*, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately $130 million and injunctive benefits valued in excess of $2 billion; *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1897 (D.N.J.), settlements in excess of $180 million; *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.), $59 million settlement achieved on behalf of financial institutions involving data breach of personal and financial information of approximately 110 million credit and debit cardholders; *Winsouth Credit Union v. Mapco Express Inc.*, No.: 3:14-cv-1573 (M.D. Tenn.), largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information; *Valle v. Popular Community Bank*, Case No. 653936/2012 (N.Y. Supreme Ct.), $5.2 million settlement

on behalf of consumers, *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of $40 million; *Bassman v. Union Pacific Corp.*, No. 97-cv-02819 (N.D. Tex.), $35.5 million securities class action settlement; *Garcia v. Carrion*, No. CV. 11-1801 (D. P.R.), substantial corporate governance reforms; *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.), $26 million securities class action settlement, *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.), $7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers, and *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.), $6.1 settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural." Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in *Hawaii Medical Association v. Hawaii Medical Service Association*, 113 Hawaii 77 (Haw. 2006), reversing the trial court's dismissal and clarifying rights for consumers under the state's unfair competition law.

Mr. Guglielmo lectures on electronic discovery and is a member of the Steering Committee of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property. Recently, Mr. Guglielmo was selected as a speaker for electronic discovery issues at the Sedona Conference as well as the Advanced eDiscovery Institute at Georgetown University Law Center. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to *The National Law Journal*'s "Plaintiffs' Hot List." In 2019, Mr. Guglielmo was again named by Super Lawyers as a top Antitrust lawyer in the New York metro area.

Mr. Guglielmo graduated from the Catholic University of America (B.A., *cum laude*, 1992; J.D., 1995) and also received a Certificate of Public Policy.

Mr. Guglielmo is admitted to practice before numerous federal and state courts: the United States Supreme Court, the United States Court of Appeals for the First Circuit, Second Circuit, Third Circuit, Eighth Circuit, Ninth Circuit and Eleventh Circuit, the United States District Courts for the Southern and Eastern Districts of New York, District of Massachusetts, District of Connecticut, District of Colorado, Eastern District of Wisconsin, New York State, the District of Columbia, and the Commonwealth of Massachusetts.

He is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, American Bar Association, and The Sedona Conference®.

WILLIAM C. FREDERICKS holds a B.A. (with high honors) from Swarthmore College, an M. Litt. in International Relations from Oxford University (England), and a J.D. from Columbia University Law School. At Columbia, Mr. Fredericks was also a three-time Harlan Fiske Stone Scholar, a Columbia University International Fellow, and the winner of the law school's Beck Prize (property law), Toppan Prize (advanced constitutional law) and Greenbaum Prize (written advocacy). A three-judge panel chaired by the late Justice Antonin Scalia also awarded Mr. Fredericks the Thomas E. Dewey Prize for the best oral argument in the final round of Columbia's Stone Moot Court Honor Competition.

After clerking for the Hon. Robert S. Gawthrop III (E.D. Pa.) in Philadelphia, Mr. Fredericks spent seven years practicing securities and complex commercial litigation at Simpson Thacher & Bartlett LLP and Willkie Farr & Gallagher LLP in New York before moving to the plaintiffs' side of the bar in 1996. Since 1996, Mr. Fredericks has represented investors as a lead or co-lead plaintiff in dozens of securities class actions, including *In re Wachovia Preferred Securities and Bond/Notes Litig*. (S.D.N.Y.) (total settlements of $627 million, reflecting the largest recovery ever in a pure Securities Act case not involving any parallel government fraud claims); *In re Rite Aid Securities Litig*. (E.D. Pa.) (total settlements of $323 million, including the then-second largest securities fraud settlement ever against a Big Four accounting firm); *In re Sears Roebuck & Co. Sec. Litig*. (N.D. Ill.) ($215 million settlement, representing the then-largest §10(b) class action recovery in an action that did not involve either a financial restatement or parallel government fraud claims); *In re State Street ERISA Litig*. (S.D.N.Y.) (one of the largest ERISA class settlements to date); *In re King Digital Sec. Enter. PLC S'holder Litig*. (Super. Ct. San Fran. Cty.) ($18.5 million settlement, representing one of the largest state court §11 class action recoveries to date); and *Irvine v. ImClone Systems, Inc*. (S.D.N.Y.) ($75 million settlement). Mr. Fredericks also played a leading role on the team that obtained a rare 9-0 decision for securities fraud plaintiffs in the U.S. Supreme Court in *Merck & Co., Inc. v. Reynolds* (which later settled for $1.052 billion), and has also coauthored amicus briefs in various other Supreme Court cases (including *Halliburton*, *Amgen*, *CALPERS v. ANZ Securities*, and *Cyan*) involving significant securities law issues.

At Scott+Scott, Mr. Fredericks' current cases include representing investors in several pending securities fraud actions, and in antitrust litigation against over a dozen leading banks based on their involvement in manipulating foreign exchange ("FX") rates and spreads.

Mr. Fredericks has been recognized in the 2012-18 editions of "America's Best Lawyers" in the field of commercial litigation, in "Who's Who in American Law" (Marquis), and in the New York City "SuperLawyers" listings for securities litigation. He has been a frequent panelist on various securities litigation programs sponsored by the Practising Law Institute (PLI) – including ten years as a panelist on civil liabilities under the Federal Securities Act – and has lectured overseas on American class action litigation on behalf of the American Law Institute/American Bar Association (ALI/ABA). He is also a member of the New York City Bar Association (former chair, Committee on Military Affairs and Justice), the Federal Bar Council and the American Bar Association.

SYLVIA M. SOKOL is a New York- and London-based partner in the firm's Antitrust and Competition Law Practice. She focuses on representing national and international clients in litigation involving domestic and international cartels. Ms. Sokol has substantial experience in all aspects of complex litigation, including the day-to-day management of cases. She also has substantial experience in counseling corporate clients, evaluating potential claims, and developing strategies to recoup losses stemming from anticompetitive conduct.

Ms. Sokol currently represents a nationwide class in price-fixing litigation regarding the $5.3 trillion-a-day foreign exchange market. She also represents a proposed nationwide class in an action involving ISDAfix, a financial benchmark that is tied to over $379 trillion of interest-rate swaps around the world. In addition, Ms. Sokol represents several large multinational

corporations alleging that Goldman Sachs, JPMorgan, Glencore, and their warehouse affiliates conspired to restrict the supply of aluminum in London Metal Exchange-approved warehouses. And she represents several government entities in a national lawsuit alleging bid-rigging in the municipal derivatives market.

In addition, Ms. Sokol's civil litigation experience has involved defending corporate clients charged with unlawful business practices and monopolizations. She has also represented clients in criminal and extradition matters.

Ms. Sokol was selected for the International Who's Who of Competition Lawyers & Economists and for Competition - U.S. in 2016, 2017, and 2018. Honorees are selected based on comprehensive and independent survey responses received from general counsel and private practitioners around the world. She has been selected to be a Fellow in The Trial Lawyer Honorary Society of the Litigation Counsel of America, which is a trial lawyer honorary society composed of less than one-half of one percent of American lawyers. *Lawyer Monthly* magazine awarded her the Women in Law Award 2017. She was also named a "Super Lawyer" in 2014, 2015, 2016, 2017, and 2018 Super Lawyers New York Metro Edition, and was named a"Super Lawyer" in 2011-2012, Super Lawyers Northern California Edition.

She is a 1998 graduate of the New York University School of Law (*cum laude*), and completed her undergraduate studies at the University of British Columbia. After law school, Ms. Sokol was awarded the Soros Justice Fellowship to serve a year in the Capital Habeas Unit of the Federal Public Defender's Office, where she represented clients condemned to death and developed training materials for members of the capital defense bar. She then served as a judicial law clerk to the Honorable Warren J. Ferguson, United States Court of Appeals for the Ninth Circuit, before spending several years working at Morrison & Foerster LLP.

Ms. Sokol is a member of the American Bar Association and is admitted to practice in New York, California, and the District of Columbia. She is also admitted to the Southern District of New York, the Northern, Southern, and Eastern Districts of California, as well as the United States Supreme Court.

She is bilingual in English and French, and holds French and United States citizenships.

PETER A. BARILE III is a partner in Scott+Scott's competition practice. His focus is on complex antitrust and commodity litigation.

Mr. Barile has extensive experience representing clients on both sides of the docket in a variety of industries and contexts, from consumers and investors to institutions and corporations, whether as individual plaintiffs, class plaintiffs, opt-outs, or defendants in complex matters. Prior to joining the firm, he practiced both in New York and in Washington D.C., with major law firms renowned for their historically leading antitrust practices.

Mr. Barile devotes a substantial amount of his practice to federal antitrust and commodity class action litigation involving the financial services industry in the Southern District of New York. Mr. Barile is or has been involved in representing investor rights in major cases involving

commodities and financial benchmarks, including: *Aluminum*, *Cotton*, *Crude Oil*, *FX*, *Gold*, *ISDAfix*, *LIBOR*, *Silver*, and *Zinc*.

He also has significant experience litigating high-tech antitrust cases in the Northern District of California, including *In re Online DVD Antitrust Litigation*; *In re Lithium Ion Batteries Antitrust Litigation*; and *In re High Tech Employees Antitrust Litigation*.

In addition to his work in federal district trial courts, Mr. Barile has considerable experience in other arenas, including the Judicial Panel on Multidistrict Litigation, federal Circuit Courts of Appeal, and the United States Supreme Court.

Mr. Barile is active in the antitrust bar, having held a number of leadership posts in the ABA and other organizations. He serves on the Advisory Board of the Loyola Institute for Consumer Antitrust Studies. Mr. Barile has published numerous articles and served as a panelist or speaker on antitrust issues. His work has been cited by the Federal Trade Commission and the Antitrust Modernization Commission, as well as leading academics and practitioners.

Mr. Barile also has helped nonprofit advocacy groups be heard in matters of national importance as Friends of the Court in major cases before the United States Supreme Court. His work has included *Leegin Creative Leather Products, Inc. v. PSKS, Inc.*, 551 U.S. 877 (2007), in which he served as lead counsel for *amicus curiae* Consumer Federation of America in a landmark antitrust case on resale price fixing, and *Giles v. State of California*, 554 U.S. 353 (2008), in which he served as lead counsel for *amicus curiae* Battered Women's Justice Project, in a case concerning the scope of the Confrontation Clause of the United States Constitution.

Mr. Barile earned his law degree in 1999 from the University of Connecticut School of Law, *magna cum laude*, where he was an Editor of the Connecticut Law Review and Moot Court Champion. His bachelor's degree is from the University of Connecticut.

Mr. Barile is a member of the bars of New York, Connecticut, and the District of Columbia. He is admitted to practice in the United States District Courts for the Southern District of New York, Eastern District of New York, District of Columbia, Northern District of Illinois, District of Connecticut; United States Courts of Appeal for the Second, Fourth, Sixth, Seventh, Ninth, Federal, and District of Columbia Circuits, and the Supreme Court of the United States.

BELINDA HOLLWAY is the head of Scott+Scott's office in London. She has over a decade of competition law experience, and specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal, particularly on behalf of multinational corporations in follow-on damages claims. She has extensive expertise in developing and coordinating multijurisdictional litigation strategies, both within Europe and beyond. She also represents investors in shareholder litigation.

Prior to joining Scott+Scott, Ms. Hollway spent nine years in the London office of Freshfields Bruckhaus Deringer LLP. She represented clients across a wide range of industries, acting in many of the leading English competition damages cases, such as *Cooper Tire*, relating to the synthetic rubber cartel, and *National Grid v. ABB*, relating to the cartel in gas insulated switchgear. She was the lead associate on the defence team in *Enron v. EWS*, which was the first

follow-on damages claim ever to reach trial in the Competition Appeal Tribunal. Her wide experience on the defence side gives her a special insight into the issues that claimants must address and overcome in order to recoup losses stemming from breaches of competition law in Europe.

Ms. Hollway has also acted for numerous clients in competition law investigations, both internal investigations and those brought by the UK Office of Fair Trading (now the Competition and Markets Authority) and the European Commission. She has been involved in immunity applications, Commission cartel settlements, and contested cases. From this work, she has an in-depth understanding of the interaction between private and public enforcement in Europe and the ramifications that public enforcement has for the strategy and progression of damages claims.

Ms. Hollway attended the Australian National University and graduated in 2001 with a First Class Honours degree in History and a First Class Honours Degree and University Medal in Law. She then spent a year as an Associate to Her Honour Justice Catherine Branson at the Federal Court of Australia and then worked for the competition and litigation teams of Allens Arthur Robinson in Sydney, prior to moving to the United Kingdom in 2006. She has a Master's Degree in Competition Law from King's College London.

She has published on competition law issues, including in relation to the EU Damages Directive and has been quoted in the press on competition law in Europe.

Ms. Hollway is admitted to practice in England and Wales and in New South Wales, Australia.

BETH A. KASWAN, during her tenure as an Assistant U.S. Attorney and subsequent promotions to Chief of the Commercial Litigation Unit and Deputy Chief of the Civil Division of the U.S. Attorney's Office for the Southern District of New York, was appointed by the FDA as lead counsel in litigation to enjoin the manufacture of adulterated generic drugs in the landmark case *United States v. Barr Laboratories, Inc.*, 812 F. Supp. 458 (D.N.J. 1993). Ms. Kaswan, who began her career as an accountant at the offices of Peat, Marwick, Mitchell & Co., and then worked as a civil trial attorney at the U.S. Department of Justice in Washington, D.C., is the recipient of several awards from the Justice Department and other agencies she represented, including the Justice Department's John Marshall award, Special Commendation from the Attorney General, a Superior Performance award from the Executive Office of U.S. Attorneys and Tax Division Outstanding Achievement awards.

While at Scott+Scott, Ms. Kaswan served as lead counsel in *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass Through Certificates*, No. 09-cv-00037 (W.D. Wa.), the WaMu RMBS Section 11 Securities Act case which settled after plaintiffs succeeded in defeating the defendants' motion for summary judgment, only weeks before it was scheduled to proceed to a jury trial. Ms. Kaswan just completed the nine-week trial in *In the Matter of the Application of The Bank of New York Mellon*, Index No. 651786/2011 (N.Y. Supr. Ct.) in which she and other interveners challenged the proposed settlement between Bank of New York Mellon and Bank of America to resolve repurchase and servicing claims for 530 Countrywide trusts. She and others at Scott+Scott recently settled federal and state law claims against the Securitization Trustees for WaMu and Bear Stearns Trusts in *Policemen's Annuity and Benefit*

Fund of the City of Chicago v. Bank of America, N.A., No. 12-cv-2865 (S.D.N.Y.) and *Oklahoma Police Pension and Retirement System v. U.S. Bank N.A.*, No. 11-cv-8066 (S.D.N.Y.), respectively. Ms. Kaswan brought a derivative suit on behalf of New York University against Ezra Merkin to freeze funds belonging to a feeder fund to Bernard Madoff. She also served as lead counsel to another shareholder derivative case, *Carfagno v. Schnitzer*, No. 08-CV-912-SAS (S.D.N.Y.), where she successfully negotiated a settlement on behalf of Centerline Holding Company and Centerline shareholders. Ms. Kaswan has served as lead counsel in *Cornwell v. Credit Suisse Group*, No. 08-cv-3758 (S.D.N.Y.) and *In re Tetra Technologies, Inc. Securities Litigation*, No. 08-cv-0965 (S.D. Tex.), among others.

Ms. Kaswan is a member of the New York and Massachusetts bars. Ms. Kaswan has been practicing law for over 35 years and is a partner in the firm's New York office.

JUDY SCOLNICK is a partner in the firm's New York office. Ms. Scolnick is a graduate of New York University (B.A., *cum laude* 1972), Brandeis University (M.A. Political Science Theory, 1973), and Boston College Law School (J.D., 1976), where she served on the Boston College Industrial and Commercial Law Review. She has extensive experience in the fields of shareholder derivative law, particularly in the pharmaceutical industry, employment law and employment class actions, and securities class actions. She has contributed substantially to recent jurisprudence expanding shareholders' rights to examine books and records of the corporations in which they hold stock. In *Cain v. Merck & Co., Inc.*, 415 N.J. Super. 319 (N.J. Super. A.D. 2010), the New Jersey Appellate Division agreed with Ms. Scolnick and held in a precedential decision that the New Jersey Business Corporation Act allows shareholders to inspect the minutes of board of directors and executive committee meetings upon a showing of proper purpose. In *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Supr. 2011), the Delaware Supreme Court ruled in a ground-breaking decision that plaintiffs may, in certain circumstances, inspect a corporation's books and records to bolster a shareholder derivative complaint even after they have filed a lawsuit.

She has served as lead counsel in many shareholder derivative actions and is currently lead counsel in *North Miami General Employees Retirement Fund v. Parkinson*, No. 10-cv-6514 (N.D. Ill.), a shareholder derivative case on behalf of pharmaceutical company, Baxter International, arising from the Board's failure to comply with FDA orders to remediate a medical device known as the Colleague Pump. She is also lead counsel in *Cottrell v. Duke*, No. 12-4041 (W.D. Ark.), a shareholder derivative action brought on behalf of Wal-Mart arising from a widespread bribery and cover-up conspiracy conducted by Wal-Mart executives and Board members.

Ms. Scolnick has experience litigating shareholder derivative actions at both the trial and appellate level. She successfully argued the Baxter appeal where the Court of Appeals for the Seventh Circuit, reversing a trial court's dismissal, held that a pension fund's complaint on behalf of all shareholders passed the pre-suit demand futility threshold test under Delaware substantive law. *Westmoreland County Employees' Retirement System v. Parkinson*, 727 F.3d 719 (7th Cir. 2013). Also in 2013, Ms. Scolnick obtained a landmark ruling in the Wal-Mart shareholder derivative litigation from the Court of Appeals for the Eighth Circuit. The Eighth Circuit reversed the district court's stay of the federal action in favor of a related proceeding in

Delaware Chancery Court, and held that a *Colorado River* stay is never appropriate where the federal complaint alleges valid, exclusive federal claims. *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013).

Ms. Scolnick has also litigated a number of important employment discrimination class actions. These include *U.S. v. City of New York*, No. 07-cv-2067, 2011 WL 4639832 (E.D.N.Y. Oct. 5, 2011) (successfully representing a class of black applicants for entry-level firefighter jobs who were discriminated against by the City of New York), *Hohider v. UPS*, 243 F.R.D. 147 (W.D. Pa. 2007), *reversed and remanded*, 574 F.3d 169 (3d Cir. 2009), where although the Third Circuit reversed certification of a nationwide class of Americans with Disabilities Act protected UPS employees, Ms. Scolnick was able to negotiate with UPS changes to its return to work policy with regard to injured workers.

Ms. Scolnick began her career by serving as a law clerk to the late Honorable Anthony Julian of the United States District Court in Massachusetts. Thereafter, she served as a trial attorney in the Civil Division of the United States Department of Justice, where she was lead counsel in several high-profile employment discrimination lawsuits against various U.S. agencies around the country.

Ms. Scolnick has been selected for the past two years in Thompson Reuter's "New York Super Lawyers."

Ms. Scolnick is admitted to practice in New York, New Jersey, and Massachusetts.

DONALD A. BROGGI is a partner in the firm's New York office. Mr. Broggi is a graduate of the University of Pittsburgh (B.A., 1990) and Duquesne University School of Law (J.D., 2000). He is engaged in the firm's complex securities, antitrust, and consumer litigation, including: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *In re: Priceline.com Inc. Securities Litigation*, No. 00-cv-1884 (D. Conn.), *Irvine v. ImClone Systems, Inc.*, No. 02-cv-0109 (S.D.N.Y.), *In re: Rubber Chemicals Antitrust Litigation*, No. C04-01648 (N.D. Cal.), *In re: Plastics Additives Antitrust Litigation*, No. 03-cv-2038 (E.D. Pa.), and *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash.), among others.

Mr. Broggi also works with the firm's institutional investor clients, including numerous public pension systems and Taft-Hartley funds throughout the United States to ensure their funds have proper safeguards in place to ensure against corporate malfeasance. Similarly, Mr. Broggi consults with institutional investors in the United States and Europe on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.

Mr. Broggi is admitted to practice in New York and Pennsylvania.

DEBORAH CLARK-WEINTRAUB is a partner in the firm's New York office. Ms. Weintraub graduated from St. John's University, Queens, New York (B.A., *summa cum laude*, 1981; President's Award in recognition of achieving highest GPA among graduates of St. John's College of Liberal Arts and Science) and Hofstra Law School in Hempstead, New York (J.D., with distinction, 1986). While in law school, Ms. Weintraub was a member and research editor of the Hofstra Law Review. Following her graduation from Hofstra Law School, Ms. Weintraub served as a law clerk to the Honorable Jacob Mishler, United States District Judge for the Eastern District of New York (1986-1987). Ms. Weintraub is a member of the New York bar.

Ms. Weintraub has extensive experience in all types of class action litigation. Ms. Weintraub has served as lead counsel for investors in mortgage-backed securities (MBS) in litigation against MBS trustees for failure to pursue repurchase remedies with respect to mortgage loans in MBS trusts that breached representations and warranties. These matters include *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.), which recovered $69 million for investors.

Ms. Weintraub is also currently representing investors in several ongoing securities class action cases including *Weston v. RCS Capital Corporation*, 1:14-cv-10136 (S.D.N.Y.); *ECD Investor Group v. Credit Suisse International*, 14-cv-8484 (S.D.N.Y.); and *In re Conn's, Inc. Sec. Litig.*, No. 4:14-cv-00548 (S.D. Tex.).

Ms. Weintraub has extensive securities class action experience and has acted as plaintiffs' co-lead counsel in numerous cases that have obtained substantial recoveries for defrauded investors. Ms. Weintraub was one of the lead counsel in *In re Oxford Health Plans, Inc. Securities Litigation*, MDL No. 1222 (S.D.N.Y.), in which a cash settlement of $300 million was obtained on the eve of trial after more than five years of litigation. At the time, the $300 million cash recovery was one of the largest recoveries ever achieved in a securities class action. The Honorable Charles L. Brieant, Jr., who presided over this case described it as "perhaps the most heavily defended, ardently pursued defense of a similar case that I can recall." Ms. Weintraub also served plaintiffs' co-lead counsel in *In re CVS Corporation Securities Litigation*, No. 01-11464 (D. Mass.), in which a cash settlement of $110 million was obtained for investors. Following the settlement in March 2006, CVS disclosed that the SEC had opened an inquiry into the manner in which CVS had accounted for a barter transaction, a subject of the class action suit, and that independent counsel to the firm's audit committee had concluded in December 2005 that various aspects of the company's accounting for the transaction were incorrect, leading to the resignations of the company's controller and treasurer.

Ms. Weintraub is the co-author of "Gender Bias and the Treatment of Women as Advocates," Women in Law (1998), and the "Dissenting Introduction" defending the merits of securities class action litigation contained in the 1994 monograph "Securities Class Actions: Abuses and Remedies," published by the National Legal Center for the Public Interest. She is a member of the Association of the Bar of the City of New York.

DARYL F. SCOTT graduated in 1981 from Vanderbilt University with a Bachelor of Arts in Economics. He received his Juris Doctorate from Creighton University School of Law in 1984, and a Masters of Taxation from Georgetown University Law Center in 1986. Mr. Scott is a partner involved in complex securities litigation at Scott+Scott. In addition to his work with the firm, Mr. Scott has specialized in private foundation and ERISA law. He was also formerly an executive officer of a private equity firm that held a majority interest in a number of significant corporations. Mr. Scott is admitted to the Supreme Court of Virginia and a member of the Virginia Bar Association and the Connecticut Bar Association.

DEIRDRE DEVANEY is a graduate of New York University (B.A., *cum laude*, 1990) and the University of Connecticut School of Law (J.D., with honors, 1998) where she was the managing editor of the Connecticut Journal of International Law. Ms. Devaney's experience includes commercial and probate litigation, as well as trusts and estates. Currently, Ms. Devaney's practice areas include commercial and securities litigation, including: *In re Priceline.com, Inc. Securities Litigation*, among others. Ms. Devaney is admitted to practice in Connecticut, New York, and the United States District Court for the District of Connecticut.

GEOFFREY M. JOHNSON is a partner in the firm's Ohio office. Mr. Johnson's practice focuses on shareholder derivative, corporate governance, and securities class action litigation. Mr. Johnson is also active in the firm's settlement and appellate practice groups.

Mr. Johnson has served as lead or co-lead counsel in several securities class action cases brought under Section 11 of the Securities Act of 1933, including *In re King Digital Entertainment plc Shareholder Litigation*, Case No. 15-544770 (Superior Court of California, San Francisco County), a shareholder lawsuit that settled for $18.5 million after suriving two separate motions to dismiss, and *Rosenberg v. Cliffs Natural Resources, Inc.*, Case No. 14-1531 (Court of Common Pleas, Cuyahoga County, Ohio), a shareholder lawsuit that settled for $10 million after the firm had engaged in extensive litigation and motion practice.

Mr. Johnson has been active in the firm's mortgage-backed securities litigation practice, serving as lead or co-lead counsel in mortgage-backed securities class action cases involving Washington Mutual (*In re Washington Mutual Mortgage-Backed Securities Litigation*, 2:09-cv-00037 (W. D. Wash.)) and Countrywide Financial (*Putnam Bank v. Countrywide Financial, Inc.*, No. 10-cv-302 (C.D. Cal.)). Mr. Johnson also helped develop the theories that the firm's pension fund clients have used to pursue class action cases against mortgage-backed security trustees. *See Retirement Board of the Policemen's Annuity & Benefit Fund of the City of Chicago v. Bank of New York Mellon* (Case No. 11-cv-05459 (S.D.N.Y.)); *Oklahoma Police Pension & Retirement System v. U.S. Bank NA* (Case No. 11-cv-8066 (S.D.N.Y.)).

Mr. Johnson has also served as lead or co-lead counsel in other major securities and ERISA cases, including: *In re Royal Dutch/Shell ERISA Litigation*, No. 04-1398 (D.N.J.), which settled for $90 million and is one of the three largest recoveries ever obtained in an ERISA class action case; *In re Priceline Securities Litigation*, 00-cv-1884 (D. Conn.), which settled for $80 million and is the largest class action securities settlement ever obtained in the State of Connecticut; and *In re General Motors ERISA Litigation*, 05-cv-71085 (E.D. Mich.), a case that settled for $37.5 million and ranks among the largest ERISA class settlements ever obtained.

Mr. Johnson is a graduate of Grinnell College (B.A., Political Science with Honors, 1996) and the University of Chicago Law School (J.D., with Honors, 1999), where he served on the law review. Prior to joining Scott+Scott, Mr. Johnson clerked for the Honorable Karen Nelson Moore, United States Court of Appeals for the Sixth Circuit.

AMANDA F. LAWRENCE is a partner in the firm's Connecticut office. Ms. Lawrence is a graduate of Dartmouth College (B.A., *cum laude*, 1998) and Yale Law School (J.D., 2002). Ms. Lawrence has been at the firm since 2007 where she splits her time between antitrust and securities matters.

In the antitrust realm, Ms. Lawrence has been intricately involved in the "ISDAFix case" (*Alaska Electrical Pension Fund v. Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y)), taking depositions and working through expert discovery, including numerous *Daubert* motions and responses. That case has to date achieved over $504.5 million in recovery from large financial institutions for investors. Ms. Lawrence is also a principal attorney litigating *Axiom Investment Advisors, LLC v. Deutsche Bank AG*, 1:15-cv-09945-LGS (S.D.N.Y.), which alleges manipulation of trading algorithms to benefit the defendant financial institution. She likewise has managed complex international investigations into suspected collusion or manipulation of financial markets. For example, she devoted herself to the international investigation of SSA bonds, which included multiple interviews with former managers of trading banks as well as extensive work with New York University professors to analyze trading data and unearth manipulation.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements, including: *Police and Fire Retirement System of the City of Detroit v. Crane*, No. 13-cv-00945-VC (N.D. Cal.) ($5.1 million settlement); *Rosenberg v. Cliffs Natural Resources, Inc.*, No. CV-14-828140 (Ohio Com. Pleas) ($10 million settlement in 1933 Act case); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) ($26 million securities class action settlement); and *In re TETRA Technologies, Inc. Securities Litig.*, No. 07-cv-00965 (S.D. Tex.) ($8.25 million securities class action settlement); *In re LendingClub Corporation Shareholder Litig.*, No. CIV 537300 (Cal. Super., San Mateo) ($125 million securities class action settlement); and *In Re: FireEye, Inc. Securities Litig.*, No. 1-14-cv-066866 (Cal. Super., Santa Clara) ($10.25 million securities class action settlement).

In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in *Vulcan Society, Inc. v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that brought both monetary and injunctive relief to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Insurance Company of America SGLI/VGLI Contract Litigation*, No. 3:11-md-02208-MAP (D. Mass.) that brought both forms of relief to relatives of deceased servicemen and women.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events. A five-time NCAA National Champion cyclist who has raced throughout the United States,

Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. She has competed in dozens of marathons, including the New York City Marathon and the Boston Marathon, and in 16 full-distance Ironman competitions – four of which were at the Ironman World Championships in Kona, Hawaii.

She is licensed to practice in Connecticut and Massachusetts, as well as the District of Connecticut, District of Massachusetts, and the Southern District of New York. Additionally, she is admitted to the Ninth and First Circuit Courts of Appeals, before which she has argued.

ERIN GREEN COMITE is a partner in the firm's Connecticut office. Ms. Comite is a graduate of Dartmouth College (B.A., *magna cum laude*, 1994) and the University of Washington School of Law (J.D., 2002). Ms. Comite litigates complex class actions throughout the United States, representing the rights of shareholders, employees, consumers, and other individuals harmed by corporate misrepresentation and malfeasance.

Ms. Comite currently serves in a leadership role in a number of complex class actions including: *First Choice Federal Credit Union v. The Wendy's Company* (W.D. Pa.), co-lead counsel on behalf of financial institutions arising out of data breach; *In Re Arby's Restaurant Group, Inc. Litigation* (N.D. Ga.), member of Plaintiffs' Executive Committee on behalf of financial institutions arising out of a data breach and *In Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-2800 (N.D. Ga.).

Recently, Ms. Comite has played a significant role in the prosecution of consumer class cases such as: *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) ($27.25 million settlement) and *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) ($59 million settlement), two of the largest data breaches impacting consumer personal data to date; *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 15-cv-02228 (N.D. Ill.), Chair of the Plaintiffs' Steering Committee ($8.1 million settlement), *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) ($6.1 settlement), *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) ($7.3 million settlement); and *In re Nutella Mktg. & Sales Practices Litig.*, No. 11-cv-01086 (D.N.J.) ($2.5 million settlement). Ms. Comite's appellate victories in consumer class actions include *Chavez v. Nestle USA, Inc.*, 511 F. App'x 606 (9th Cir. 2013) (achieving a reversal of dismissal), and *In re Nutella Mktg. & Sales Practices Litig.*, 2014 WL 4801262 (3d Cir. Sept. 29, 2014) (defending settlement from professional objectors).

Since joining Scott+Scott in 2002, she has litigated such cases as *In re Priceline.com Securities Litigation* ($80 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.* ($27 million settlement); and *In re Qwest Communications International, Inc.* (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence). While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In *Hohider v. United Parcel Service, Inc.*, Ms. Comite spearheaded a nearly year-long investigation into every facet of UPS's preservation methods, requiring intensive, full-time efforts by a team of attorneys and paralegals well beyond that required in the normal course of pre-trial litigation. Ms. Comite assisted in devising the plan of investigation in weekly conference calls with the

Special Master, coordinated the review of over 30,000 documents that uncovered a blatant trail of deception and prepared dozens of briefs to describe the spoliation and its ramifications on the case to the Special Master. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the Court conditioned the parties' settlement of the three individual ADA case on UPS adopting and implementing preservation practices that passed the approval of the Special Master.

Prior to entering law school, Ms. Comite served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.

Ms. Comite's volunteer activities have included assisting immigrant women, as survivors of domestic violence, with temporary residency applications as well as counseling sexual assault survivors. Currently, Ms. Comite supports Connecticut Children's Medical Center and March of Dimes/March for Babies.

Ms. Comite is licensed to practice in the State of Connecticut and is admitted to practice in the U.S. District Court for the District of Connecticut, the Southern District of New York, the District of Colorado, the Eastern District of Wisconsin, and the U.S. Court of Appeals for the Second, Third, Ninth, and Eleventh Circuits.

THOMAS LAUGHLIN is a partner in the firm's New York office. Mr. Laughlin is a graduate of Yale University (B.A. History, *cum laude*, 2001) and New York University School of Law (J.D., *cum laude*, 2005). After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

Mr. Laughlin's practice focuses on securities class action, shareholder derivative, ERISA and other complex commercial litigation. While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including *Cornwell v. Credit Suisse,* No. 08-3758 (S.D.N.Y.) (securities settlement of $70 million), *Rubenstein v. Oilsands Quest Inc.,* No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million) *Plymouth County Contributory Ret. Sys. v. Hassan,* No. 08-1022 (D.N.J.) (corporate governance reform); and *Garcia v. Carrion,* No. 09-1507 (D.P.R.) (corporate governance reform). Mr. Laughlin is a member of the New York bar and is admitted to practice in the Southern District of New York and the Eastern District of New York.

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including *Cottrell v. Duke,* 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Retir. Sys. v. Parkinson*, 727 F.3d 719 (7th Cir. 2013); *Pfeil v. State Street Bank and Trust Co.,* 671 F.3d 585 (6th Cir. 2012); and *King v. VeriFone Holdings, Inc*., 12 A.3d 1140 (Del. Supr. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in *Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC*, No. 12-cv-00127 (D. Me.). Mr. Laughlin represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and directors of a bank and its auditor in connection with an $18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

MAX SCHWARTZ is a partner based in New York. His main practice area is complex civil litigation, with an emphasis on financial products and services. He also counsels investment firms and institutional investors on strategies to enhance returns, or recoup losses, through a variety of legal actions.

Following the financial crisis, Mr. Schwartz served as lead counsel in several cases that set important precedents regarding mortgage-backed securities. He argued the first cases to find that securitization trustees must seek to have defective mortgages repurchased from MBS trusts. These efforts recently led to the recovery of $69 million for investors in Washington Mutual MBS and $6 million for investors in Bear Stearns MBS. *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.); *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association*, 1:11-cv-8066 (S.D.N.Y.).

Currently, Mr. Schwartz represents investment firms pursuing claims against MBS servicers. He also represents plaintiffs in a securities action against Nicholas Schorsch and RCS Capital Corp., among others. *Weston v. RCS Capital Corp.*, 1:14-cv-10136 (S.D.N.Y.).

Mr. Schwartz has substantial experience in competition and antitrust matters as well. He was part of the team that secured a $590 million settlement stemming from allegations that several of the largest leveraged buyouts were subject to collusion. *Dahl v. Bain Capital Partners, LLC*, 1:07-cv-12388 (D. Mass.). In addition, Mr. Schwartz has advised clients in antitrust matters ranging from pharmaceuticals to precious metals and has advised companies seeking merger review before a number of regulatory agencies.

Super Lawyers named Mr. Schwartz a Rising Star. The Legal Aid Society also recognized him with a Pro Bono Service Award for work before the New York Court of Appeals.

Mr. Schwartz holds a B.A. from Columbia University (*cum laude*), and a J.D. from New York University School of Law.

DAVID HOWE is a competition, EU and public lawyer, and Senior Counsel at Scott+Scott Europe. He trained at Freshfields Bruckhaus Deringer LLP and, after qualification, spent a further eight years in the competition and dispute resolution teams there.

David has acted for a range of multinational clients on the full spectrum of competition investigations (in both the UK and internationally) litigation and advice. He has conducted competition damages claims in the English High Court, Court of Appeal and Competition

Appeal Tribunal, and also appeared in the European Court of Justice. He acted for Roche on its defence of litigation arising out of the Vitamins cartel (including in the Devenish litigation, which ruled on the availability of restitutionary and exemplary damages in follow-on claims) and, for EWS in its defence of claims brought by the administrators of Enron for damage following EWS' abuse of dominance (the first follow-on damages action to go to trial in the Competition Appeal Tribunal). He has published several articles on competition law, including in relation to the new EU Damages Directive.

David also has significant wider expertise, including in bribery, public and regulatory law, and human rights matters. For instance, he was the lead associate co-ordinating a multi-jurisdictional regulatory and public law strategy for a major consumer products company, and has acted on a number of judicial reviews for a range of clients, including (as lead associate) on a significant judicial review of the lawfulness of domestic consumer products legislation, relying primarily on EU free movement and human rights grounds. In addition to "classic" human rights claims, David also has expertise in the evolving body of hard and soft law arising out of the UN "Ruggie Principles" on Business and Human Rights, having assisted a major technology company on a full Ruggie-compliant assessment of, and mitigation strategy for, a new project.

David attended Oxford University. He studied Law and French Law, was appointed a scholar, and graduated in 2003 with First Class Honours (being placed in the top 3% of his year), and a Diploma in French Law from the Universite Pantheon-Assas (Paris II). After a year completing professional qualifications, he returned to Oxford University to study the BCL (Oxford University's LLM equivalent), graduating in 2005 with a Distinction and a university prize, and was subsequently short-listed for the All Souls Prize Fellowship. In the early years of his practice at Freshfields, David also completed an LLM in European Law at Kings College London.

TOM SOUTHWELL is a partner in Scott+Scott Europe LLP's London office.

Tom specialises in international arbitration and has represented individuals, corporate clients, and financial institutions in arbitration proceedings under the rules of the major arbitral institutions and before all levels of the English Courts. He has particular expertise in the oil and gas, energy and financial services sectors, and in relation to disputes arising out of share sale transactions, joint ventures, and civil fraud.

Tom also acts in competition damages litigation and is currently acting for a number of potential claimants in follow-on damages actions arising from the Trucks cartel.

Before joining Scott+Scott, Tom was a member of the International Litigation and Arbitration group at Skadden, Arps, Slate, Meagher & Flom (UK) LLP, in London.

DAVID H. GOLDBERGER is an associate in Scott+Scott's San Diego office. Currently, Mr. Goldberger's practice is focused on antitrust litigation, initial case investigations, and other special projects.

Representative actions include *Kleen Products LLC v. Packaging Corporation of America*, No. 10-cv-5711 (N.D. Ill.), an action challenging price-fixing in the containerboard industry, and *In*

re Lithium Ion Batteries Antitrust Litig., No. 13-md-2420 (N.D. Cal.), an action challenging price-fixing of Li-Ion batteries. Mr. Goldberger has also worked on antitrust cases involving delayed generic drug entry, such as *Mylan Pharmaceuticals Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-cv-3824 (E.D. Pa.) ($8 million settlement) and *In re Prograf Antitrust Litig.*, No. 1:11-md-02242 (D. Mass.).

Previously, Mr. Goldberger was active in Scott+Scott's securities fraud and ERISA practice, including *In re: Priceline.com Securities Litigation*, 03-cv-1884 (D. Conn.) ($80 million settlement), *Alaska Electrical Pension Fund v. Pharmacia Corporation*, No. 03-1519 (D.N.J.) ($164 million settlement), and *In re: General Motors ERISA Litigation*, No. 05-71085 (E.D. Mich.) (resulting in significant enhancements to retirement plan administration in addition to $37.5 million settlement for plan participants).

Mr. Goldberger was also a member of Scott+Scott's institutional investor relations staff, providing the Firm's many institutional clients with assistance in various matters pertaining to their involvement in complex civil litigations.

Mr. Goldberger is also a frequent contributing author to Market+Litigation, Scott+Scott's monthly client newsletter.

Mr. Goldberger graduated from the University of Colorado (B.A., 1999) and California Western School of Law (J.D., 2002). Mr. Goldberger is admitted to practice by the Supreme Court of the State of California and in all California United States District Courts.

A San Diego native, Mr. Goldberger was a founding member of the Torrey Pines High School "Friends of the Library" and coaches youth sports in his spare time.

JULIE A. KEARNS has been litigating complex class action cases, focusing primarily on violations of federal antitrust and securities laws, since 2006. She also has experience handling civil matters in California state court, and is located in Scott+Scott's San Diego office. Ms. Kearns has been recognized as a Rising Star in the 2015, 2016, 2017, and 2018 editions of Super Lawyers. She was also honored by the San Diego Business Journal as Best of the Bar in 2015.

At Scott+Scott, Ms. Kearns presently devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y) and *Alaska Elec. Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y).

A native Southern Californian, Ms. Kearns earned her Bachelor of Arts degree from the University of California, Santa Barbara, in 2003, with a double major in Political Science and Law & Society. She graduated *cum laude* from Thomas Jefferson School of Law in 2006. During law school, Ms. Kearns served as Executive Board Co-Chair of the Moot Court Society, and participated in multiple competitions across the country. She also served as judicial intern to the Honorable Judge William S. Cannon, who oversaw civil matters in the Superior Court of California, County of San Diego. She completed internships at various public defender entities

at both the state and federal levels, and drafted sponsorship agreements and similar documents as legal intern for the local minor league ice hockey team, the San Diego Gulls.

As an avid animal lover and supporter of animal rights, Ms. Kearns has served as *pro bono* volunteer attorney in association with the non-profit association Expand Animal Rights Now ("EARN") since 2016. She is a long-time supporter of the San Diego Humane Society, the San Diego Zoological Society, the ASPCA, and other similar organizations. Ms. Kearns has also made presentations to middle and high school students around San Diego County as part of the annual, non-partisan Constitution Day event organized by the San Diego ACLU.

Ms. Kearns is licensed to practice law in the state of California, and is admitted to the U.S. District Court for the Southern, Central, and Northern Districts of California, the District of Colorado, and the U.S. Court of Appeals for the Fifth Circuit.

CIAN MANSFIELD is a senior associate in Scott+Scott Europe LLP's London office. He specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal, and the Court of Appeal.

Cian is currently acting as lead associate for a large number of retailers in their claims in the English High Court against Visa and MasterCard in relation to anti-competitive interchange fees; and as lead associate on behalf of a number of potential claimants in follow-on damage actions arising from the Trucks cartel.

Prior to joining Scott+Scott Europe LLP, Cian spent over six years in the London office of Freshfields Bruckhaus Deringer LLP. During his time at Freshfields, Cian worked on a number of competition damages claims arising from European Commission infringement decisions in relation to a number of cartels, including in the energy and industrial sectors. He also acted in a number of investigations, both internal investigations and those brought by international regulators (including the European Commission and the Competition and Markets Authority), and on pieces of general commercial litigation.

Cian also has extensive pro bono experience. He currently acts as an advocate on behalf of failed and pending asylum seekers at the Asylum Support Tribunal as a member of the charity, the Asylum Support Appeals Project. While at Freshfields, Cian worked on UK Supreme Court interventions for the Office of the Children's Commissioner and the Open Society Justice Initiative.

Cian attended University College Dublin, Ireland and graduated in 2007 with a Bachelors of Civil Law (European Legal Studies) (First Class Honours). As part of his degree he spent a year studying at the University of Lausanne in Switzerland. Cian has an LL.M from the University of Cambridge and a Postgraduate Diploma in EU Competition Law from King's College London.

Following his LL.M, Cian completed a five-month *stage* (internship) at the Legal Service of the European Commission in Brussels.

Cian is admitted to practice in England & Wales and the Republic of Ireland.

THOMAS K. BOARDMAN is an associate in the Scott+Scott's New York office, focusing on antitrust litigation. At his prior firm, Mr. Boardman was a member of the trial team in *In re TFT-LCD (Flat Panel) Antitrust Litigation*. For his work on that case, Mr. Boardman was nominated by Consumer Attorneys of California as a finalist for Consumer Attorney of the Year. Mr. Boardman was also an instrumental part of the lead counsel team in *In re Potash Antitrust Litigation (II)*, a case that featured a unanimous victory before an *en banc* panel of the Seventh Circuit, resulting in one of the most influential antitrust appellate opinions in recent memory. The case ended in $90 million in settlements.

At Scott+Scott, Mr. Boardman represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* and represents opt-out plaintiffs in *Mag Instrument Inc v. The Goldman Sachs Group Inc.* Mr. Boardman also represents indirect purchaser plaintiffs in *In re Lithium Ion Batteries Antitrust Litigation*.

Mr. Boardman received his Bachelor of Arts degree from Vassar College in 2004, majoring in Political Science and Film Studies. He received his Juris Doctorate from the University of California, Hastings College of the Law in 2009. While at Hastings, Mr. Boardman was a member of the Hastings Science and Technology Law Journal and worked as a research assistant to professors Geoffrey C. Hazard, Jr. and Rory K. Little. Mr. Boardman is a member of the following Bars: California, New York, Ninth Circuit Court of Appeals, Central District of California, Northern District of California, and Southern District of California. He is also a member of the following professional associations: ABA Antitrust Section – Model Jury Instruction Revision Task Force, ABA Antitrust Section – Young Lawyers Division – Litigation Committee, ABA Antitrust Section – Young Lawyers Division – Civil Practice and Procedure Committee, New York State Bar Association – Antitrust Section, Bar Association of San Francisco, and Public Justice Foundation.

Mr. Boardman has co-authored the following articles: "Reverse Engineering Your Antitrust Case: Plan for Trial Even Before You File Your Case," *Antitrust Magazine*, Spring 2014, Vol. 28, No. 2, with Bruce L. Simon; and "Class Action for Health Professionals," chapter from *Advocacy Strategies for Health and Mental Health Professionals*, Springer Publishing Co., 2011, with Bruce L. Simon, Stuart L. Lustig, Editor.

Prior to joining Scott+Scott, Mr. Boardman worked at Pearson, Simon & Warshaw, LLP in San Francisco and served as a judicial law clerk to the Hon. Christina Reiss in United States District Court, District of Vermont.

Mr. Boardman enjoys running and regularly does so for charity. He has run several races to fundraise for various causes, including the New York City Marathon (National Multiple Sclerosis Foundation) and the Boston Marathon (Cystic Fibrosis Foundation).

PATRICK McGAHAN is an associate in Scott+Scott's London office. He specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal. Mr. McGahan works closely with other members of the firm's Antitrust and Competition Practice in counseling corporate and institutional clients, evaluating potential

claims and developing strategies to recover losses caused by anticompetitive conduct. He has also acted for clients in a variety of arbitrations (both investment treaty and commercial) and pieces of general commercial litigation.

Mr. McGahan is presently representing numerous clients who may have European claims arising from the manipulation of the foreign exchange market. He is also acting for various national and multinational retailers in relation to competition damages claims arising from Visa and MasterCard's card payment schemes.

Prior to joining Scott+Scott, Mr. McGahan spent four years in the London office of Freshfields Bruckhaus Deringer LLP. During this time he acted in many of the leading English competition damages cases, including *National Grid Electricity Transmission Plc v ABB Ltd*. He also acted for numerous clients in competition law investigations, both internal investigations and those brought by the Competition and Markets Authority, the European Commission, and other regulators.

Mr. McGahan attended the University of Queensland and graduated in 2010 with a Bachelor of Laws (First Class Honours) and a Bachelor of Arts (Economics/Political Science). He then spent a year as the Associate to His Honour Justice Andrew Greenwood at the Federal Court of Australia. Mr. McGahan has a Postgraduate Diploma in Competition Law from King's College London.

Mr. McGahan is admitted to practice in England and Wales and in Queensland, Australia.

JAMES HAIN-COLE is located in Scott+Scott's London office. He specialises in competition damages litigation before the English Courts and the Competition Appeal Tribunal. Mr. Hain-Cole works with the firm's Antitrust and Competition Practice in advising international clients on their potential to claim damages arising from anticompetitive conduct and working with them to design an effective strategy to compensate them for losses arising from such conduct. He has also has experience in commercial arbitration and general commercial litigation.

Prior to working with Scott+Scott, Mr. Hain-Cole spent two and a half years at Cuatrecasas in Madrid, where he advised on competition damages claims before the courts of Spain, England and Italy and also formed part of the team that drafted the legal section of the "*Study on the Passing-on of Overcharges*" for the European Commission. Prior to that, Mr. Hain-Cole spent six years in the London office of Freshfields Bruckhaus Deringer LLP, where he advised clients in some of the leading competition damages before the English courts and tribunals, including *Deutsche Bahn AG and others v Morgan Advanced Materials Plc* and *Cooper Tire and Rubber Company Europe Ltd and others v. Dow Deutschland Inc and others*. He also acted for a major financial institution in competition law investigations before the European Commission and other competition regulators worldwide, including in the North America and Asia.

Mr. Hain-Cole attended the University of St. Andrews and graduated in 2006 with a Master of Arts (First Class Honours) in International Relations and Modern History. He then gained the Graduate Diploma in Law and the Legal Practice Course at BPP Law School, London. In 2015,

obtained the BASL DMU Postgraduate Certificate in Sports Law from De Montfort University, Leicester.

Mr. Hain-Cole is admitted to practice in England and Wales. He has professional proficiency in Spanish.

JOHN JASNOCH's practice areas include securities and antitrust class actions, shareholder derivative actions, and other complex litigation. Mr. Jasnoch represented plaintiffs in *In re Washington Mutual Mortgage-Backed Securities Litigation*, Case No. 2:09-cv-00037 (W.D. Washington), a case that was litigated through summary judgment and settled on the eve of trial for $26 million. Mr. Jasnoch was also one of the lead attorneys that secured a $7.68 million settlement in *In re Pacific Biosciences Securities Litigation*, Case No. CIV509210 (San Mateo County, California). Other cases Mr. Jasnoch has worked on that have achieved notable results include: *West Palm Beach Police Pension Fund v. Cardionet, Inc.*, Case No. 37-2010-00086836-CU-SL-CTL (San Diego County, California) ($7.25 million settlement), *Hodges v. Akeena Solar*, 09-cv-2147 (N.D. Cal.) ($4.77 million settlement), *Plymouth County Contributory Ret. Sys. v. Hassan*, No. 08-1022 (D.N.J.) (corporate governance reform), and *In re HQ Sustainable Maritime Industries, Inc., Derivative Litigation*, Case No. 11-2-16742-9 (King County, Washington) ($2.75 million settlement).

As an active member of the Consumer Attorneys of California, Mr. Jasnoch has prepared and submitted successful *amicus curie* briefs to the Ninth Circuit Court of Appeals, including on California's Anti-SLAPP law and consumer protection issues.

Mr. Jasnoch graduated *cum laude* from Creighton University with a Bachelor of Arts in Political Science in 2007. He received his Juris Doctorate from The University of Nebraska College of Law in 2011 and is a member of the California Bar.

MICHAEL G. BURNETT is a graduate of Creighton University (B.A., 1981) and Creighton University School of Law (J.D., 1984). Mr. Burnett practices complex securities litigation at the firm where he consults with the firm's institutional clients on corporate fraud in the securities markets as well as corporate governance issues. In addition to his work with the firm, Mr. Burnett has specialized in intellectual property and related law. Mr. Burnett is admitted to the Nebraska Supreme Court and United States District Court, District of Nebraska. He is a member of the Nebraska Bar Association.

DOUGLAS CAMPBELL is an associate in Scott+Scott's London office who specialises in competition damages litigation. Douglas regularly works with clients and counsel, considering competition and regulatory claims, assessing their merits and viability. He has knowledge of the third-party funding sector and has experience of working on funded cases and preparing proposals for third-party funding.

Douglas is currently representing a number of clients with potential claims against financial institutions for manipulation of the foreign exchange market, and acting for several retailers with claims against Visa and Mastercard in respect of charges and rules imposed in respect of their card payment schemes.

Prior to joining Scott+Scott, Douglas spent five years working for a major UK law firm in Edinburgh and London. During this time he acted in a number of competition damages and general commercial claims in the English High Court and Court of Appeal. His experience includes acting for a Part 20 Defendant airline in the *Air Cargo* follow-on and stand-alone damages claims and acting for a FTSE 250 listed company coordinating a claim against a major UK bank for manipulation of the foreign exchange market. Douglas represented clients across a broad range of industries in the public and private sectors.

Douglas studied law at the University of Edinburgh and spent a year studying law and politics at Université Paul Cézanne Aix-Marseille III in France.

Douglas is admitted to practise in England & Wales and Scotland.

J. ALEX VARGAS serves as Scott+Scott's Director of Investigations. He has devoted over a decade of his career investigating claims on behalf of institutional investors and other stakeholders. At Scott+Scott, Mr. Vargas conducts and oversees investigations across all practice groups. Prior to joining the firm, Mr. Vargas was involved in several high-profile securities fraud cases, including one where he served as the principal investigator in connection with a 14-year litigation, resulting in the largest securities fraud settlement following a trial; a record $1.575 billion recovery in *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.).

Representative antitrust class actions include: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.); *In re SSA Bonds Antitrust Litigation*, No. 1:16-cv-03711-ER (S.D.N.Y.); and *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-cb-27240-CMR (E.D. Pa.).

Representative securities class actions include: *Ret. Bd. of the Policemen's Annuity and Benefit Fund of Chicago v. FXCM Inc.*, No. 1:15-cv-03599-KMW (S.D.N.Y.); *Union Asset Management Holding AG v. SanDisk LLC*, No. 3:15-cv-01455-VC (N.D. Cal.); *In re LendingClub Corp. Shareholder Litig.*, No. CIV537300 (Cal. Super. Ct., San Mateo County) (settlement of $125 million); *In re MobileIron, Inc. S'holder Litig.*, No. 1-15-cv-284001 (Cal. Super. Ct., Santa Clara County) (settlement of $7.5 million); *In re Endochoice Holdings, Inc. Sec. Litig.*, C.A. No. 2016 cv 277772 (Ga. Super. Ct. Fulton County); and *Rubenstein v. Oilsands Quest Inc.*, No. 11-cv-288 (S.D.N.Y.) (settlement of $10.235 million).

Representative consumer and data breach class actions *include In re Pacific Coast Oil Trust Sec. Lit.*, No. BC550418 (Cal. Sup. Ct., Los Angeles County) (settlement of $7.6 million); *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-2228 (N.D. Ill.) (settlement of $5.2 million); *WinSouth Credit Union v. MAPCO Express, Inc.*, No. 14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information); *Selco Community Credit Union v. Noodles & Co.*, C.A. No. 1:16-cv-2247 (D. Colo.); and *First Choice Fed. Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506 (W.D. Pa.).

Mr. Vargas graduated from the University of San Diego (B.A., 1997) and the University of San Diego School of Law (J.D., 2004). He is admitted to practice in New York, California, and the District of Columbia.

STEPHANIE HACKETT is an associate in Scott+Scott's San Diego office. She primarily practices in the area of antitrust litigation on behalf of classes and individual plaintiffs.

Ms. Hackett has represented class plaintiffs in *Dahl v. Bain Capital Partners, LLC, No. 1:07-cv-12388 (D. Mass.)* ($590.5 million settlement) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-3824 (E.D. Pa.) ($8 million settlement). She represented corporate opt-out clients in *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.).

Ms. Hackett's current cases include representing class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate. Ms. Hackett also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum.

As a part of her *pro bono* work, Ms. Hackett has worked with the San Diego Volunteer Lawyer Program, providing assistance to immigrant victims of domestic violence, and the ABA Immigration Justice Project, where she obtained a grant of asylum on behalf of her client.

Ms. Hackett is an active member of the American Bar Association's Antitrust Section and the San Diego La Raza Lawyers Association. She is also a contributing author to Market+Litigation, Scott+Scott's monthly newsletter.

Ms. Hackett is a graduate of the University of Iowa (B.S. Political Science, International Business Certificate, 2001) and of the University of Iowa College of Law (J.D., with distinction, 2005), where she was a recipient of the Willard L. Boyd Public Service Distinction award. While obtaining her law degree, Ms. Hackett worked as a judicial extern for the Honorable Celeste F. Bremer, United States District Court for the Southern District of Iowa. Ms. Hackett is admitted to practice in California.

In addition to her legal education, Ms. Hackett has engaged in accounting study and passed all four parts of the CPA exam. This background has proved particularly useful in cases involving the financial services industry.

HAL CUNNINGHAM is a graduate of Murray State (B.S. Biological Chemistry) and the University of San Diego School of Law. Prior to joining Scott+Scott, Mr. Cunningham was engaged in research and development in the chemical and pharmaceutical industries.

Mr. Cunningham's practice focuses on securities class action, shareholder derivative, and consumer litigation. While at Scott+Scott, Mr. Cunningham has worked on several cases that

have achieved notable results, including *In re Washington Mutual Mortgage Backed Securities Litigation*, No. C09-0037 (W.D. Wash.) (securities settlement of $26 million). Mr. Cunningham is also involved in the Firm's securities lead plaintiff motion practice, having briefed several successful lead plaintiff applications for the firm's institutional and individual clients.

Mr. Cunningham is a regular contributor to and editor of Scott+Scott's monthly newsletter, MARKET+LITIGATION.

Mr. Cunningham is admitted to practice in California.

S. SINAI MEGIBOW is an Investigator in Scott+Scott's Investigations Department. He has extensive experience conducting a wide range of investigations, including securities fraud, internal investigations, antitrust matters, Foreign Corrupt Practices Act compliance, corporate due diligence, and litigation intelligence. Prior to joining Scott+Scott, Sinai served as a Director in a global private investigation and intelligence consulting firm. Sinai began his career as an associate attorney practicing in the areas of White Collar Criminal matters and commercial litigation.

Mr. Megibow graduated from Tulane University (B.A., 1995), University of Chicago (M.A., 1998) and UCLA School of Law (J.D., 2001). He is admitted to practice in New York. He is also a Certified Fraud Examiner and a licensed private investigator in New York and Florida.

YIFAN ("KATE") LV is an associate in Scott+Scott's San Diego office. Her practice focuses on prosecuting antitrust actions with an emphasis on intercultural cartels.

Ms. Lv represents plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y), challenging foreign-exchange market manipulation by many global financial institutions. Ms. Lv also represents and advises the Firm's Asian clients.

Ms. Lv graduated from Tianjin University of Commerce, Tianjin, China, with a Dual Bachelors in Law and Economics in 2008, from Peoples University of China, Beijing, China with a Master in Law in June 2010, and from William & Mary School of Law in 2014.

Ms. Lv is bilingual, speaking fluent Chinese and English.

Ms. Lv is a member of the California, New York, and China Bars.

MICHELLE CONSTON is an associate at Scott+Scott's New York office, focusing on antitrust litigation.

Prior to joining Scott+Scott, Ms. Conston represented institutional investors, hedge funds, and individual investors in complex class action litigation arising under the Commodity Exchange Act, Sherman Act, RICO Act, and common law. She was heavily involved in litigating actions alleging the manipulation of the London Interbank Offered Rate ("LIBOR") for several currencies by large financial institutions (*e.g.*, *Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-3419 (S.D.N.Y.) and *Sullivan v. Barclays plc*, No. 13-cv-00281 (S.D.N.Y.)), as well as an action

alleging manipulation of the daily London Silver Fixing by the Fixing Banks and several other financial institutions (*In re London Silver Fixing, Ltd., Antitrust Litigation*, No. 14-md-02573 (S.D.N.Y.)).

At Scott+Scott, Ms. Conston presently devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y) and *Alaska Elec. Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y).

Ms. Conston is a graduate of Marist College (B.A., *magna cum laude*, 2010) and the University of Miami School of Law (J.D., *magna cum laude*, 2013). During law school, Ms. Conston served as a judicial intern for the Honorable Stephen T. Brown, the Chief Magistrate Judge of the United States District Court for the Southern District of Florida. Ms. Conston also served as a certified legal intern for the United States Attorney's Office for the Southern District of Florida.

Ms. Conston is licensed to practice law in New York, New Jersey, and Florida, and is admitted to the U.S. District Court for the Southern District of New York.

SCOTT JACOBSEN is an associate in Scott+Scott's New York office. Mr. Jacobsen practices in the areas of shareholder derivative actions, securities class action litigation, and other complex litigation.

While at Scott+Scott, Mr. Jacobsen has primarily focused on securities and derivative litigation, including investigation of corporate books and records to evaluate potential claims on behalf of shareholders. Cases include *International Union of Operating Engineers Local No. 478 Pension Fund v. McInerney*, C.A. No. 11901-VCN (Del. Ch. Jan 13, 2016) (derivatively on behalf of Genworth Financial Inc.); *Carlson v. Dipp*, No. 1:15-cv-14032 (D. Mass. Dec. 7, 2015) (securities class action); *Fernicola v. Hugin*, C.A. No. 11748-VCMR (Del. Ch. Nov. 24, 2015) (derivatively on behalf of Celgene Corp.); *Feldman v. Kulas*, C.A. No. 11614-VCG (Del. Ch. Oct. 15, 2015) (derivatively on behalf of Santander Consumer USA Holdings Inc.); *Fortunato v. Akebia Therapeutics, Inc.*, No. 1:15-cv-13501 (D. Mass. Oct. 5, 2015) (securities class action).
Mr. Jacobsen graduated from The George Washington University (B.A. English, *magna cum laude*; M.A., English) and William & Mary Law School (J.D. 2014). During law school, Mr. Jacobsen externed at the American Civil Liberties Union of Virginia and served as a staff member for the William & Mary Bill of Rights Journal.

Mr. Jacobsen is a member of the following professional associations: ABA Business Section and ABA Young Lawyers Division. Mr. Jacobsen is also a regular contributor to Scott+Scott's monthly newsletter. He is admitted to practice in New Jersey, New York, and the United States District Court for the Southern District of New York.

RHIANA SWARTZ is an associate in the firm's New York office. Ms. Swartz graduated *magna cum laude* from Brooklyn Law School in 2006, and received her B.A. from Swarthmore College in 2000. After graduating from law school, Ms. Swartz clerked for the Honorable Joan M. Azrack in the Eastern District of New York.

Ms. Swartz's practice focuses on securities class actions and shareholder derivative actions.

Prior to joining Scott+Scott, Ms. Swartz was Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, Office of Corporation Counsel, where she handled federal cases brought under 42 U.S.C. §1983 from initial receipt of complaint through trial verdict. Ms. Swartz settled more than 80 cases and conducted four federal trials. Ms. Swartz also spent more than four years as an Associate at Sullivan & Cromwell LLP in New York, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and employment law issues.

Ms. Swartz is a member of the New York bar and is admitted to practice in the Southern District of New York, Eastern District of New York, and Second Circuit.

SEAN T. MASSON is an associate in Scott+Scott's New York office. Mr. Masson's practice focuses on securities class action, mass torts, and other complex commercial litigation. *Super Lawyers* has named Mr. Masson a Rising Star for four consecutive years (2015-2018) for his work as a securities class action litigator.

Prior to entering the private sector, Mr. Masson served as an Assistant District, successfully argued over 40 appeals in state and federal courts and gained extensive experience with large-scale government and regulatory investigations. Notable cases include: *People v. McKelvey* (upheld 75-year sentence for serial rapist preying on homeless women); *People v. Doyle* (affirming conviction for notorious fine art thief); and *People v. Wong* (affirming conviction of driving school instructor involved in hit and run of a child).

Mr. Masson graduated from Queens College (*summa cum laude*) and Hofstra University School of Law (*cum laude*). During law school, Mr. Masson served as the Senior Notes and Comments Editor of the *Hofstra Law Review* and won various awards during Moot Court competitions.

Mr. Masson's publications include:

The Presidential Right of Publicity, 2010 Boston College Intellectual Property & Technology Forum 012001.

Note, *Cracking Open the Golden Door: Revisiting U.S. Asylum Law's Response To China's One-Child Policy*, 37 Hofstra Law Review 1135 (2009).

MARGARET (MAGGIE) FERRON is an associate at the Firm's Connecticut office. Ms. Ferron is a graduate of Middlebury College (B.A., 2003) and the University of Connecticut School of Law (J.D., High Honors, 2009). During law school, Ms. Ferron worked for the Honorable Janet Bond Arterton of the U.S. District Court for the District of Connecticut and for the Iran Human Rights Documentation Center in New Haven, Connecticut. As an undergraduate, she studied classical languages and history in Athens, Greece; as a law student, she studied international human rights law at Trinity College, Dublin, Ireland.

Prior to joining the firm, Ms. Ferron worked as a plaintiffs' employment lawyer in Hartford for several years. Her experience also encompasses municipal affairs and state grant compliance. Ms. Ferron practices in varied Connecticut state court matters as well as federal class actions. She is admitted to practice in Connecticut and the U.S. District Court for the District of Connecticut.

Ms. Ferron is a trustee of Joshua's Tract Conservation and Historic Trust, located in Mansfield, Connecticut. She successfully led an effort to build an accessible playground in Mansfield and enjoys trail running and reading with her family.

LAUREN S. MCCABE is an associate in Scott+Scott's New York office. Ms. McCabe's practice focuses on securities class actions.

Prior to joining Scott+Scott, Ms. McCabe practiced complex commercial litigation for ten years at the New York office of Gibson Dunn & Crutcher LLP.

Ms. McCabe graduated from Pepperdine University (*summa cum laude*) and New York University School of Law, where she was a McKay Scholar.

Ms. McCabe's publications include:

"*Justice Holland's Lasting Imprint on Corporate Law*," Delaware Business Court Insider (March 14, 2017).

JING-LI YU is an associate in the New York office where he focuses on shareholder derivative and federal securities litigation.

Mr. Yu is a graduate of the University of Pennsylvania (B.A., Economics, *cum laude*, 2001), University of Chicago (M.A., Social Sciences, 2005), and the University of Chicago Law School (J.D., 2010).

Prior to joining Scott+Scott, Mr. Yu was a litigation associate based in Wilmington, Delaware at a litigation boutique that primarily represented institutional plaintiffs, and before then, he was a litigation and investigations associate based in New York, New York at two international law firms that primarily represented institutional defendants.

Mr. Yu is admitted to practice before the States of Delaware and New York. He is also admitted to the United States District Courts for the Eastern District of New York and Southern District of New York, as well as the United States Court of Appeals for the Second Circuit.

CAREY ALEXANDER is an associate in Scott+Scott's New York office where he focuses on complex consumer litigation and class actions.

Mr. Alexander received his B.A. from Skidmore College in 2004, and graduated *magna cum laude* from St. John's University School of Law in 2012. During law school, Mr. Alexander served as Associate Managing Editor of the *St. John's Law Review*. His student note, *Abusive:*

Dodd–Frank Section 1031 and the Continuing Struggle To Protect Consumers, 85 St. John's L. Rev. 1105 (2012), has been cited in several legal journals, including the *Harvard Law Review*.

Prior to law school, Mr. Alexander served as an editor of the consumer-advocacy blog, *Consumerist.com*. He also served as an advisor to the Bronx Borough President and worked as part of the National Campaign to Restore Civil Rights.

Mr. Alexander is admitted to practice in the State of New York and in several federal courts, including New York's Southern, Eastern, and Western Districts, the Northern District of Illinois, and Court of Appeals for the Ninth Circuit.

ANJALI BHAT is an associate at the Firm's New York office. Ms. Bhat is a graduate of Swarthmore College (B.A., High Honors, 2007) and Columbia Law School (J.D., High Honors, 2011). During law school, Ms. Bhat was a Harlan Fiske Stone Scholar and a finalist in the Harlan Fiske Stone Moot Court Competition. As an undergraduate, she studied history.

Prior to joining the firm, Ms. Bhat clerked for the Honorable William F. Kuntz II of the United States District Court for the Eastern District of New York. In addition to securities class actions, her experience also encompasses real estate litigation in New York state courts. She is admitted to practice in New York and the U.S. District Courts for the Southern and Eastern Districts of New York. She enjoys reading, tennis, and rock climbing.

JOSEPH G. CLEEMANN is an associate at the Firm's New York Office. He represents dozens of governmental entities in seven states who are prosecuting pharmaceutical manufacturers and distributors in opioid litigation.

Prior to coming to the Firm, Joe worked eight years at Ropes & Gray, LLP, where he principally represented corporate defendants in government prosecutions, class actions, and complex business litigation. He has extensive experience in the area of data privacy.

Joe is a graduate of Brooklyn Law School, from which he graduated *cum laude* in 2009. He spent his first year out of law school at a Ropes-sponsored fellowship with the Legal Aid Society's Prisoners' Rights Project. During law school, he interned with the Hon. Robert Sack in the Second Circuit and the Hon. Shira A. Scheindlin in the Southern District of New York.

Joe has additional degrees from Columbia University (M.S., Journalism, 2004) and Harvard University (A.B., History, 1998). Prior to entering the law, he worked seven years in trade book publishing.

RANDY MOONAN is an associate in the firm's New York office. Mr. Moonan's practice focuses on securities class actions.

Prior to joining Scott+Scott, Mr. Moonan was a litigation associate at Simpson Thacher & Bartlett LLP, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and insurance law issues.

Mr. Moonan is a graduate of the University at Albany (B.A., History and Political Science, *magna cum laude*, Phi Beta Kappa, 2010) and Cornell Law School (J.D. 2013). During law school, Mr. Moonan served as a Managing Editor of the Cornell Journal of Law and Public Policy.

Mr. Moonan is admitted to practice in New York and the United States District Court for the Southern and Eastern Districts of New York.

KASSANDRA NELSON is an associate in the firm's New York office where she focuses on securities and antitrust litigation.

Ms. Nelson is a graduate of the University of Alabama (B.A., *cum laude* 2012) and Southern Methodist University (J.D., 2016). During law school, Ms. Nelson volunteered over 450+ hours in Legal Public Service and received the distinction of Pro Bono Honor Roll upon graduation. She worked as an intern for the Domestic Violence Division at the Dallas County District Attorney's Office as well as an extern for the Honorable Judge Martin Hoffman. Ms. Nelson served as a student attorney for SMU's Innocence Clinic, working with the Dallas County Public Defender's Office and New York Innocence Project, and successfully advocated for the release and exoneration of Steven Chaney, freed after wrongfully serving more than 25 years.

Ms. Nelson is admitted to practice in the State of Texas.

JONATHAN ZIMMERMAN is an associate in the New York office where he focuses on shareholder derivative and federal securities litigation.

Mr. Zimmerman is a graduate of McGill University, Desautels School of Management (B.Commerce, 2009) and Temple University, Beasley School of Jaw (J.D., 2016). While in law school, Mr. Zimmerman served as a Staff Editor on Temple's International and Comparative Law Journal. He also received the Best Paper Award in Advanced Financial Regulations for his work entitled *Corporate Diversions*: *Short-Term Tax Savings at the Expense of Shareholder Rights* (Spring 2015).

Prior to joining Scott+Scott, Mr. Zimmerman practiced in the areas of shareholder derivative, federal securities, and *Qui Tam* litigation as an Associate at The Weiser Law Firm, located in the suburbs of Philadelphia, Pennsylvania.

Mr. Zimmerman is a member of the New Jersey and Pennsylvania Bars. He is also a admitted to the U.S. District Court for the District of New Jersey and the U.S. District Court for the Eastern District of Pennsylvania.

A former two-time All-Canadian collegiate lacrosse player and co-captain of McGill University's men's varsity team, Mr. Zimmerman loves watching and playing sports when he, his wife, and his son are not exploring New York City's vibrant food scene.

PHILIPPA (PIPPA) WINSTANLEY is an associate in Scott+Scott Europe LLP's London office. She specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal.

Pippa is currently representing potential claimants in follow-on damage actions against Visa and MasterCard in relation to anti-competitive interchange fees. She is also acting on behalf of clients seeking compensation from participants in a long-running multinational cartel. Pippa also works on general commercial litigation, including a dispute relating to a major property portfolio in the UK.

Prior to joining Scott+Scott Europe LLP, Pippa trained at Marriott Harrison LLP and qualified in commercial litigation at Clyde & Co LLP, where she represented major energy and aviation clients in relation to various debt recovery and breach of contract claims. Pippa has experience representing both corporations and individual shareholders.

Pippa attended the University of Oxford and graduated in 2012 with a Bachelor of Music. Pippa subsequently undertook a Graduate Diploma of Law and LLM in Law at the University of Law, London.

Pippa is admitted to practice in England and Wales.

RUTH MANSON is an associate in Scott+Scott Europe LLP's London office.

Ruth specialises in commercial and competition litigation. She is currently working as part of the firm's Antitrust and Competition Practice advising a number of retailers regarding claims against Visa and MasterCard in respect of anti-competitive interchange fees, and working with numerous clients assessing potential claims arising from the manipulation of the foreign exchange market.

Prior to joining Scott+Scott Europe LLP, Ruth completed her traineeship at a major UK law firm in London. During her traineeship, Ruth worked on a number of large scale litigations including a multi-million pound breach of contract claim and acting on behalf of a Part 20 Defendant in the on-going Air Cargo cartel litigation.

Ruth attend the University of Cambridge (Trinity Hall) and graduated in 2015 with a Bachelor of Arts in Law. She subsequently completed her Legal Practice Course, which she passed with distinction, at the University of Westminster.

Ruth is admitted to practice in England and Wales.

JEFFREY P. JACOBSON is an associate in the New York office where he focuses on federal securities litigation.

Jeff is a graduate of the George Washington University Law School (J.D., High Honors, Order of the Coif, 2017) and George Washington University (B.A., Journalism & Political Science, *summa cum laude*, Distinguished Scholar, 2013).

Prior to joining Scott+Scott, Jeff was a litigation associate at a major international law firm where he represented clients in securities cases, bankruptcy proceedings, and antitrust matters, and advised clients on employment matters.

Jeff is admitted to practice in the State of New York.

JUSTIN W. BATTEN is an associate in the firm's New York office. Mr. Batten's practice focuses on complex and class action litigation with an emphasis on antitrust and consumer protection matters. Prior to joining Scott+Scott, Mr. Batten served as an Assistant Attorney General in the New York Attorney General's Antitrust Bureau.

Mr. Batten is an active member of the New York State Bar Association's Antitrust Section. He serves as the Young Lawyer Liaison to the Antitrust Section's Executive Committee, and is a member of the Donnelly Act Revision Committee.

Mr. Batten is a graduate of New York University School of Law (J.D., 2017) and Georgia State University (B.A. Spanish, *cum laude*, 2012). While at NYU, Mr. Batten served as an intern with the Georgia Attorney General's Office and Texas RioGrande Legal Aid, assisted clients in a clinic with employment law matters, and was a Teaching Assistant to Professor Mark Geistfeld for a first-year torts course. Mr. Batten also served as an articles editor for NYU's *Journal of Law & Liberty*.

Mr. Batten is admitted to practice in New York.

G. DUSTIN FOSTER's main practice areas include antitrust, securities, and complex litigation, which includes such cases as *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *Dahl v. Bain Capital Partners, LLC*, No. 1:07-cv-12388 (D. Mass.), and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 2:12-cv-03824 (E.D. Pa.). Mr. Foster is a member of the West Virginia State Bar.

Mr. Foster is a graduate of West Virginia Wesleyan College (B.S., Biology, *cum laude*, 1999) and of the West Virginia University College of Law (J.D., 2002), where he earned a position on the Moot Court Board and Lugar Trial Association. During law school, Mr. Foster served as a law clerk for the West Virginia Supreme Court of Appeals, after which he assumed a full-time term position as a law clerk for the Hon. Thomas C. Evans, III, of the Fifth Circuit Court of West Virginia.

JOSEPH A. PETTIGREW's practice areas include securities, antitrust, shareholder derivative litigation, and other complex litigation, including work on the following cases: *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.); *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y); and *Marvin H. Maurras Revocable Trust v. Bronfman*, 12-cv-3395 (N.D. Ill.).

Mr. Pettigrew graduated from Carleton College (B.A., Art History, *cum laude*, 1998) and from the University of San Diego School of Law (J.D., 2004). Mr. Pettigrew has served on the board and as legal counsel to several nonprofit arts organizations.

Mr. Pettigrew is admitted to practice in California and Maryland.

JACEY BOGLER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Jacey graduated, *cum laude*, from Iowa State University with a Bachelor of Arts degree in Psychology and Criminal Justice (minor) in 2010. She graduated with *honors* from Drake University Law School in 2014. While at Drake, Jacey was a junior staff and editorial board member of the Drake Law Review.

Jacey is admitted to practice in the State of Iowa.

JOEL BOORAS is a staff attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Mr. Booras received his B.A. from the University of San Diego in 2008, and graduated from the University of San Diego School of Law in 2012.

Prior to joining Scott+Scott, Mr. Booras practiced in the personal injury field and managed cases in the electronic discovery arena for several high-profile technology clients.

Mr. Booras is admitted to practice in the State of California.

VICTORIA BURKE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Victoria received her B.A. from Arizona State University in 1997, and graduated from Southwestern Law School in 2011. Additionally, in 2014, Victoria attained a certificate of completion from Loyola Law School's Fashion Law Summer Intensive program.

On behalf of the American Bar Association, Victoria serves as Vice-Chair of the Trademark Transactions Committee, Chair of the Fashion Law Subcommittee, and former Vice-Chair of the Trademark Litigation Committee. She also frequently authors law articles on a range of topics for various legal publications, most recently for the Daily Journal in November 2016, "*Blunt Talk About Trademarks in the Marijuana Business*." Victoria has also served as panelist for many programs, such as the ABA's webinar *Runway Ready: Fashion Law Fundamentals* (2016). Victoria has volunteered her time to Bet Tzedek's *Employment Rights Project: Wages and Hour* cases and regularly serves as a moot court judge for Pepperdine University School of Law's Annual National Entertainment Law Moot Court Competition.

Victoria is admitted to practice in the State of California and the District of Columbia, and in several federal courts, including the U.S. District Court for the Central District of California.

ELIZABETH A. CAMPOS is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Campos received her B.A. from the University of Southern California in 1997, and graduated from Thomas Jefferson School of Law in 2001.

Ms. Campos is admitted to practice in the State of California and is registered to practice in front of the U.S. Patent and Trademark Office.

NGA CUNNINGHAM is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Nga received her B.A. from the University of California, San Diego in Political Science with an emphasis on Public Policy, and graduated, *cum laude*, from Thomas Jefferson School of Law in 2005.

Nga is admitted to practice in the State of California and in the U.S. District Court for the Central District of California.

YVONNE FUNK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Yvonne received her B.A. from UCLA in 2001, and graduated from UC Hastings law school in 2007. She is admitted to practice in the State of California.

CARLY HENEK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Carly received her B.S. from State University of New York at Albany in Human Biology, and graduated from St. John's School of Law in 2001.

Carly has extensive state and federal court experience litigating against and representing major U.S. and international corporations and individual clients in all phases of the litigation process. Her practice focuses on complex commercial litigation and securities fraud litigation.

Carly is admitted to practice in the State of California and New York, including all federal courts in California and New York.

TODD S. HIPPER is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Todd received his B.A. in Political Science from University of California, Berkeley in 1996, and graduated from Georgetown University Law Center in 2001.

Todd is admitted to practice in the States of California and New York, and in several federal courts, including all federal courts in California, and the U.S. District Court for the Eastern District of New York.

RANDALL AUBREY PETRIE is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Randall received his B.A. from Hamilton College in 1988, and graduated from George Washington University School of Law in 1992, Dean's Fellow.

Randall is admitted to practice in the States of New York and New Jersey and in U.S. District Court for the Southern District of New York.

MELANIE PORTER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Melanie graduated from UCLA with a B.A. in Psychology in 2003. She received her J.D. from California Western School of Law in 2006, where she graduated *cum laude* in her concentration. While at CWSL, Melanie served as President of the Asian Pacific Law Student Association and Hawaiian Law Student Association, as well as Secretary and Chair of Community Relations for the Health Law Society and Co-Chair of the Social and Membership Committee for Phi Alpha Delta.

In 2016 and 2017, Melanie received the Rising Star recognition by Super Lawyers. She is currently a member of the California State Bar, San Diego County Bar Association, Consumer Attorneys of San Diego, and the American Bar Association.

She is admitted to practice in the State of California and the U.S. Southern District of California.

SEAN RUSSELL is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Mr. Russell graduated in 2008 from the University of California, Davis with a Bachelor of Arts in Economics. He received his Juris Doctorate from Thomas Jefferson School of Law in 2015, *cum laude*, where he was Chief Articles Editor of the Thomas Jefferson Law Review and a Moot Court Competitor. While at Thomas Jefferson, Mr. Russell also served as an extern to the Honorable William V. Gallo of the U.S. District Court for the Southern District of California. Mr. Russell received a Masters of Taxation from the University of San Diego School of Law in 2016.

Mr. Russell is admitted to practice in the State of California and the U.S. District Court for the Southern District of California.

AMY SIPE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Sipe received her B.A. and M.A. from the University of Missouri in Communications, and graduated from the University of Missouri School of Law in Kansas City.

Prior to joining Scott+Scott, Ms. Sipe worked as in-house counsel for a highly diversified Fortune 500 corporation and for an Am Law Top 20 Litigation Firm. Most recently, in addition to antitrust litigation and class actions, Ms. Sipe has focused on best practices in the areas of electronic discovery, information governance, compliance, and risk management.

Ms. Sipe is admitted to practice in the State of Kansas and in the U.S. Court of Appeals for the 10th Circuit.

BRANDON ZAPF is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Brandon received his B.A. from the University of California, Santa Barbara, in 2002, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007. He received his LL.M. in taxation from the University of San Diego School of Law in 2011.

Brandon is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central District of California.

CAITLIN ZAPF is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Caitlin received her B.A. from the University of California, San Diego in 2003, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007.

Caitlin is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central, Eastern, and Northern Districts of California.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT

REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Scott+Scott Attorneys at Law LLP

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Christopher Burke (P)											2.20	0.80			3.00	$995.00	$2,985.00
John Jasnoch (P)										0.50	1.60	8.20			10.30	$600.00	$6,180.00
Dustin Foster (OC)									1.50	1.00	1.20	0.70			4.40	$425.00	$1,870.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.50	1.50	5.00	9.70	0.00	0.00	17.70		$11,035.00
NON-ATTORNEYS																	
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.50**	**1.50**	**5.00**	**9.70**	**0.00**	**0.00**	**17.70**		**$11,035.00**

EXHIBIT C

EXHIBIT C

IN RE: LITHIUM ION BATTERIES INDIRECT

Detailed Reported Hours and Lodestar at Historic Hourly Rates

Scott+Scott Attorneys at Law LLP | **Reporting Period: March 1, 2017 through April 1, 2018**

Date	*Entry #*	*Matter*	*Lwyr*	*Hours*	*Rate*	*Amount*	*Explanation*
4/12/2017	1871670	12104	John Jasnoch	0.50	$ 575.00	$ 287.50	Review of class certification decision for email update to [redacted]
4/18/2017	1872015	12104	Dustin Foster	1.00	$ 400.00	$ 400.00	Reading opinion denying class certification and correspondence with co-counsel regarding [redacted] to prepare for teleconference with client regarding [redacted]
4/24/2017	2000352	12104	Christopher Burke	1.00	$ 900.00	$ 900.00	Conference call regarding [redacted]
6/23/2017	2010938	12104	Christopher Burke	1.00	$ 950.00	$ 950.00	Update with John Jasnoch regarding [redacted]
2/14/2018	2042351	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email update to W. Noss and Daryl Scott regarding [redacted].
2/19/2018	2042365	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Email correspondence with Plaintiff Donna Shawn regarding [redacted]
5/7/2018	2079756	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Confer with G. Foster to update plaintiff Linda Lincoln on the [redacted].
6/25/2018	2103285	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference with J. Jasnoch re [redacted] and [redacted]
6/27/2018	2091884	12104	Dustin Foster	0.50	$ 425.00	$ 212.50	Call with client regarding [redacted]; correspondence with co-counsel regarding [redacted]
7/23/2018	2100497	12104	Christopher Burke	0.40	$ 995.00	$ 398.00	Conference with leads re [redacted]; conference with J. Jasnoch
7/23/2018	2107222	12104	John Jasnoch	1.50	$ 600.00	$ 900.00	Confer with C. Burke regarding [redacted].
7/24/2018	2107226	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Confer with Client Donna Shawn about [redacted]; email correspondence with co-lead firms regarding [redacted]
7/24/2018	2107227	12104	John Jasnoch	0.60	$ 600.00	$ 360.00	Confer with G. Foster regarding [redacted].
7/26/2018	2104665	12104	Dustin Foster	1.00	$ 425.00	$ 425.00	Correspondence and call with client regarding [redacted]; reading [redacted] and preparing for meeting with client to discuss [redacted]

Date	*Entry #*	*Matter*	*Lwyr*	*Hours*	*Rate*	*Amount*	*Explanation*
7/26/2018	2104665	12104	Dustin Foster	1.80	$ 425.00	$ 765.00	traveling to and meeting with client regarding [redacted] and discussing correspondence with co-counsel regarding [redacted]
11/7/2018	2159002	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with Tamarah Prevost regarding [redacted].
11/7/2018	2159003	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Conferral with D. Foster on [redacted].
11/12/2018	2159020	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Email correspondence with D. Foster regarding settlement with Panasonic Sanyo defendant.
11/12/2018	2159021	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Update to C. Burke, W. Noss, and Daryl Scott regarding [redacted].
11/16/2018	2161896	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference with leads and J. Jasnoch re [redacted]
11/16/2018	2159033	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Review of letter from co-lead counsel regarding [redacted] confer with D. Foster regarding [redacted].
11/16/2018	2159034	12104	John Jasnoch	0.40	$ 600.00	$ 240.00	Email correspondence to class rep Donna Shawn regarding [redacted]; email to C. Burke regarding [redacted]
11/19/2018	2161954	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference re [redacted]
11/19/2018	2157767	12104	Dustin Foster	0.10	$ 425.00	$ 42.50	Correspondence with lead counsel regarding mee [redacted]
11/19/2018	2159035	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Teleconference with Donna Shawn regarding [redacted]
11/19/2018	2159036	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with co-lead counsel Brian Miller advising of [redacted].
11/26/2018	2159038	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with class rep Donna Shawn on [redacted].
12/21/2018	2169853	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Review of status report re settlements; update to C. Burke re [redacted].
				17.70		$ 10,857.50	

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
SCOTT+SCOTT ATTORNEYS AT LAW LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$ 50,000.00
Court Fees (Filing, etc.)	700.00
Federal Express	477.21
Hearing Transcripts	5,949.90
Lexis/Westlaw	686.89
Photocopies – In House (capped at $0.20 per copy)	2,242.60
Postage	27.78
Telephone/Telecopier	19.02
Travel	7,001.29
TOTAL:	$ 67,104.69

EXHIBIT 58

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DARYL F. SCOTT IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SCOTT+SCOTT ATTORNEYS AT LAW LLP**

I, DARYL F. SCOTT, declare:

1. I am a member of Scott+Scott Attorneys at Law LLP ("Scott+Scott"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representatives, Linda Lincoln and Donna Shawn, and as counsel for IPPs throughout the course of this litigation as a member of the Indirect Purchaser Plaintiffs' Steering Committee. *See* ECF No. 229. The background and experience of Scott+Scott and its attorneys are summarized in the *curriculum vitae* attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Scott+Scott performed the following work: (i) conferring with the class representatives represented by Scott+Scott and keeping them apprised of the status of the litigation; (ii) working with several additional class representatives in responding to requests for production of documents and interrogatories; (iii) working with class representatives to collect and produce responsive discovery materials to Defendants; (iv) preparing for and defending multiple class-representative depositions; (v) conferring with class representatives regarding the proposed settlements; (vi) researching and drafting an opposition to one of the Defendants' motions to dismiss; (vii) reviewing documents produced by Defendants; and (viii) performing other tasks at the direction of the co-lead counsel firms.

5. Attached hereto as **Exhibit B** is a billing summary of Scott+Scott's total hours and lodestar, reported at the firm's current billing rates, from March 1, 2017 to present. The summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at

historical billing rates. The time reported is for work assigned by Co-Lead Counsel and performed by the professional staff at my law firm.

6. A summary of work performed by Scott+Scott and the detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Daryl F. Scott in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Scott+Scott and filed on May 26, 2017. (ECF No. 1813-36.) Counsel for Plaintiffs did not, and do not, seek attorneys' fees for time billed before the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the number of hours spent by Scott+Scott since June 1, 2013 totals 1,872.5, and the lodestar totals $790,690.00.

8. Attached hereto as **Exhibit D** is a summary of the expenses and charges my firm incurred from June 1, 2013 to present, including applicable case filing fees. Scott+Scott incurred $67,104.69 in unreimbursed expenses and charges on a contingent fee-basis in the prosecution of this case on behalf of IPPs. The expenses and charges were prepared from reports, vouchers, receipts, and bank records and accurately reflect the expenses and charges incurred by Scott+Scott in this case. I have reviewed the time and expenses reported by Scott+Scott in this declaration, and I affirm that they are true and accurate.

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

Executed on April 11, 2019 at Richmond, Virginia.

/s/ Daryl F. Scott

Daryl F. Scott

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

SCOTT+SCOTT
ATTORNEYS AT LAW LLP



MISSION STATEMENT

Scott+Scott Attorneys at Law LLP ("Scott+Scott") is a nationally recognized law firm headquartered in Connecticut with offices in California, New York City, and Ohio. Scott+Scott represents individuals, businesses, public and private pension funds, and others who have suffered from corporate fraud and wrongdoing. Scott+Scott is directly responsible for recovering hundreds of millions of dollars and achieving substantial corporate governance reforms on behalf of its clients. Scott+Scott has significant expertise in complex antitrust, consumer, securities, ERISA, and civil rights litigation in both federal and state courts. Through its efforts, Scott+Scott promotes corporate social responsibility.

ANTITRUST

Scott+Scott litigates complex antitrust cases throughout the United States. Scott+Scott represents investors, business, and consumers in price-fixing, bid-rigging, monopolization, and other restraints of trade cases on both a class-wide and individual basis, helping to ensure that markets remain free, open, and competitive. With the opening of a London Office, Scott+Scott's commitment to competition now includes pursuing its clients' claims on a global basis.

Scott+Scott's class action antitrust practice includes serving as court-appointed lead counsel with the responsibility for the prosecution of class claims. Scott+Scott serves as court-appointed lead counsel in high-value antitrust class action cases, including *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (challenging bid rigging and market allocation of leveraged buyouts by private equity firms resulting in $590.5 million in settlements)); *In Re: Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) (challenging price-fixing of foreign exchange rates (over $2 billion in partial settlements negotiated)); and *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y.) (challenging price-fixing of the ISDAfix benchmark interest rate). Scott+Scott has served as court-appointed lead counsel in other cases, including *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891, No. CV 07-06542 (C.D. Cal.) (challenging price-fixing/illegal surcharge ($86 million in cash and travel voucher settlements) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 12-cv-03824 (E.D. Pa.) (challenging monopolization in the sale of name-brand pharmaceutical ($8 million settlement)).

When not serving as lead counsel, Scott+Scott has served on the executive leadership committees in numerous class action cases. Representative actions include *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 1:05-md-1720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry ($7.25 billion settlement)); *Kleen*

Products LLC v. Packaging Corporation of America, No. 1:10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products); and *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420-YGR (DMR) (N.D. Cal.) (challenging price-fixing of lithium-ion batteries).

Scott+Scott's class action antitrust experience includes serving as co-trial counsel in *In re Scrap Metal Antitrust Litigation*, 02-cv-0844-KMO (N.D. Ohio), where it helped obtain a $34.5 million jury verdict, which was subsequently affirmed by the United States Court of Appeals for the Sixth Circuit (*see In re Scrap Metal Antitrust Litigation*, 527 F.3d 517, 524 (6th Cir. 2008)), and in the consolidated bench trial in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.), and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Scott+Scott also represents large clients in opt-out antitrust litigation. Scott+Scott currently represents Eastman Kodak Company, Agfa Corporation, Agfa Graphics, N.V., and Mag Instrument, Inc. in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.). Scott+Scott previously represented publicly traded corporations, such as Parker Hannifin Corporation and PolyOne Corporation, in matters such as *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastic Additives Antitrust Litigation (No. II)*, MDL No. 1684 (E.D. Pa.).

CONSUMER RIGHTS

Scott+Scott and its attorneys have a proven track record of obtaining significant recoveries for consumers in class action cases. Scott+Scott is one of the premier advocates in the area of consumer protection law and has been appointed to a number of prominent leadership positions.

Cases where Scott+Scott has played a leading role in the area of consumer protection litigation include:

- *In re Providian Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) ($105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *The Vulcan Society, Inc. v. City of New York*, No. 07-cv-02067 (E.D.N.Y.) ($100 million settlement and significant injunctive relief was obtained for a class of black and Hispanic applicants who sought to be New York City firefighters but were denied or delayed employment due to racial discrimination);
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) ($40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts);
- *In re Target Corp. Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) ($59 million settlement achieved on behalf of financial institutions involving data breach of personal and financial information of approximately 40 million credit and debit card holders);

- *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 15-cv-02228 (N.D. Ill.) ($18 million monetary and injunctive settlement on behalf of financial institutions involving data breach of credit and debit card information);

- *Winsouth Credit Union v. Mapco Express Inc.*, Case No.: 3:14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information);

- *Gunther v. Capital One, N.A.*, No. 09-2966 (E.D.N.Y.) (a net settlement resulting in class members receiving 100% of their damages was obtained);

- *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.) ($37 million settlement obtained on behalf of class of propane purchasers who alleged defendants overcharged the class for under-filled propane tanks);

- *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-1091 (E.D. Va.) ($7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers); and

- *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) ($6.1 settlement obtained on behalf of a class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural").

Moreover, Scott+Scott is currently serving in a leadership capacity in a number of class action consumer protection cases, including:

- *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, preliminary approval of $27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders);

- *First Choice Federal Credit Union v. The Wendy's Co.*, 2:16-cv-00506 (W.D. Pa.) (co-lead counsel, claims on behalf of financial institutions involving data breach of personal and financial information of millions of credit and debit card holders);

- *In re UnitedHealth Group PBM Litigation*, Case No. 0:16-cv-3352 (D. Minn.) (co-lead counsel, claims on behalf of plan participants involving overcharge of copayments for prescription drugs);

- *In re Cigna Corporation PBM Litigation*, Case No. 3:16-cv-1702 (D. Conn.) (Chair of Executive Committee, claims on behalf of plan participants involving overcharge of copayments for prescription drugs);

- *Midwest America Federal Credit Union v. Arby's Restaurant Group, Inc.*, 1:17-cv-00514 (N.D. Ga.) (member of Executive Committee, claims on behalf of financial institutions involving data breach of credit and debit card information); and

- *In re Herbal Supplements Marketing and Sales Practices Litigation*, MDL No. 2519 (N.D. Ill.) (claims on behalf of a class of consumers alleging major retail-chain defendants misrepresent the ingredients in store-branded herbal supplements).

SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott represents individuals and institutional investors that have suffered from stock fraud and corporate malfeasance. Scott+Scott's philosophy is simple – directors and officers should be truthful in their dealings with the public markets and honor their duties to their shareholders. Since its inception, Scott+Scott's securities and corporate governance litigation department has developed and maintained a reputation of excellence and integrity recognized by state and federal and state courts across the country. "It is this Court's position that Scott+Scott did a superlative job in its representation, which substantially benefited Ariel . . . . For the record, it should be noted that Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case . . . . They have possessed a knowledge of the issues presented and this knowledge has always been used to the benefit of all investors." *N.Y. Univ. v. Ariel Fund Ltd.*, No. 603803/08, slip. op. at 9-10 (N.Y. Sup. Ct. Feb. 22, 2010). "The quality of representation here is demonstrated, in part, by the result achieved for the class. Further, it has been this court's experience, throughout the ongoing litigation of this matter, that counsel have conducted themselves with the utmost professionalism and respect for the court and the judicial process." *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884, 2007 WL 2115592, at *5 (D. Conn. July 20, 2007).

Scott+Scott has successfully prosecuted numerous class actions under the federal securities laws, resulting in the recovery of hundreds of millions of dollars for shareholders. Representative cases prosecuted by Scott+Scott under the Securities Exchange Act of 1934 include: *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn. July 19, 2007) ($80 million settlement); *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y. July 29, 2005) ($75 million settlement); *Cornwell v. Credit Suisse Group*, No. 08-cv-03758 (S.D.N.Y. July 20, 2011) ($70 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.*, No. 02-cv-2133 (D. Conn. June 13, 2008) ($26.5 million settlement); and *St. Lucie County Fire District Firefighter's Pension Trust Fund v. Oilsands Quest Inc.*, No. 11-cv-1288-JSR (S.D.N.Y. Dec. 6, 2013) ($10.23 million settlement) ($7.85 million settlement preliminarily approved). Representative cases prosecuted by Scott+Scott under the Securities Act of 1933 include: *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash. Jan. 7, 2014) ($26 million settlement); *In re Pacific Biosciences Securities Litigation*, No.CIV509210 (Cal. Super. Ct., San Mateo County, Oct. 31, 2013) ($7.68 million settlement); *West Palm Beach Police Pension Fund v. CardioNet, Inc.*, No. 37-2010-00086836-CU-SL-CTL (Cal. Super. Ct., San Diego County, 2010) ($7.25 million settlement); *Parker v. National City Corp.*, No. CV-08-657360 (Ohio Ct. Com. Pl., Cuyahoga County, June 23, 2010) ($5.25 million settlement); and *Hamel v. GT Solar International, Inc.*, No. 217-2010-CV-05004 (N.H. Super. Ct., Merrimack County, May 10, 2011) ($10.25 million settlement).

Scott+Scott currently serves as court-appointed lead counsel in various federal securities class actions, including *Birmingham Retirement and Relief System, v. S.A.C. Capital Advisors*, No. 1:12-cv-09350 (S.D.N.Y. June 17, 2013); *In re NQ Mobile Securities Litigation*, No. 13-cv-

07608 (S.D.N.Y. April 9, 2014); *In re Conn's Inc. Securities Litigation*, No. 14-cv-00548 (S.D. Tex. June 3, 2014) and *Weston v. RCS Capital Corp.*, No. 14-10136 (S.D.N.Y., Dec. 29, 2014).

In addition to prosecuting federal securities class actions, Scott+Scott has a proven track record of handling corporate governance matters through its extensive experience litigating shareholder derivative actions. In addition, Scott+Scott has been singularly successful in its shareholder derivative appellate practice, and as a result, has been instrumental in fashioning the standards in this area of law. In *Westmoreland County Employee Retirement System v. Parkinson*, No. 12-3342 (7th Cir. Aug. 16, 2013), the Seventh Circuit clarified the parameters of demand futility in those instances where a majority of directors of a corporation are alleged to have breached the fiduciary duty of loyalty by consciously disregarding positive law. In *Cottrell v. Duke*, No. 12-3871 (8th Cir. Dec. 28, 2013), the Eighth Circuit, in a case of first impression, clarified that the *Colorado River* stay is virtually never appropriate where there are exclusive federal claims. And in *King v. Verifone Holdings, Inc.*, No. 330, 2010 (Del. Jan. 28, 2011), the Supreme Court of Delaware has clarified the availability of the Delaware Corporate Code Section 220 "books and records" demands to a shareholder whose original plenary action was dismissed without prejudice in a federal district court. Representative actions prosecuted by Scott+Scott include: *In re DaVita Healthcare Partners Derivative Litigation*, No. 13-cv-1308 (D. Colo.) (corporate governance reform valued at $100 million); *North Miami Beach General Employees Retirement Fund v. Parkinson*, No. 10C6514 (N.D. Ill.) (corporate governance valued between $50 million and $60 million); *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894-RMW (RS) (N.D. Cal. Aug. 11, 2009) ($54.9 million and corporate governance reforms); *In re Qwest Communications International, Inc.*, No. Civ. 01-RB-1451 (D. Colo. June 15, 2004) ($25 million and corporate governance reform); *Plymouth County Contributory Retirement Fund v. Hassan*, No. 08-cv-1022 (D.N.J.) (settlement of derivative claims against Merck Schering Plough and its officers and directors providing for corporate governance reforms valued between $50 million and $75 million); *Carfagno v. Schnitzer*, No. 08-cv-912-SAS (S.D.N.Y. May 18, 2009) (modification of terms of preferred securities issued to insiders valued at $8 million); and *Garcia v. Carrion*, No. 3:09-cv-01507 (D.P.R. Sept. 12, 2011) (settlement of derivative claims against the company and its officers and directors providing for corporate governance reforms valued between $10.05 million and $15.49 million).

Currently, Scott+Scott is actively prosecuting shareholder derivative actions, including *In re Bio-Rad Laboratories, Inc. Stockholder Litigation*, C.A. No. 11387 (Del. Ch. Aug. 13, 2015); *In re Tile Shop Holdings, Inc. Stockholder Derivative Litigation*, C. A. No. 108884 (Del. Ch. July 31, 2015); *West Palm Beach Fire Pension Fund v. Page*, No. 15-1334 (N.D. Cal. March 23, 2015); *In re Duke Energy Corp. Coal Ash Derivative Litigation*, C.A. No. 9682 (Del. Ch. May 21, 2014); and *In re OSI Systems, Inc. Derivative Litigation*, No. 14-2910 (C. D. Cal. April 15, 2014).

EMPLOYEE BENEFITS (ERISA)

Scott+Scott litigates complex class actions across the United States on behalf of corporate employees alleging violations of the federal Employee Retirement Income Security Act. ERISA was enacted by Congress to prevent employers from exercising improper control over retirement plan assets and requires that pension and 401(k) plan trustees, including employer corporations,

owe the highest fiduciary duties to retirement plans and their participants as to their retirement funds. Scott+Scott is committed to continuing its leadership in ERISA and related employee-retirement litigation, as well as to those employees who entrust their employers with hard-earned retirement savings. Representative recoveries by Scott+Scott include: *In re Royal Dutch/Shell Transport ERISA Litigation*, No. 2:04-cv-01398-JWB-SDW (D.N.J. Aug. 30, 2005) ($90 million settlement); *In re General Motors ERISA Litigation*, No. 2:05-cv-71085-NGE-RSW (E.D. Mich. June 5, 2008) ($37.5 million settlement); and *Rantala v. ConAgra Foods*, No. 8:05-cv-00349-LES-TDT (D. Neb.) ($4 million settlement).

CIVIL RIGHTS LITIGATION

Scott+Scott has also successfully litigated cases to enforce its clients' civil rights. In *The Vulcan Society, Inc. v. The City of New York*, No. 1:07-cv-02067-NGG-RLM (E.D.N.Y.), Scott+Scott was part of a team of lawyers representing a class of black applicants who were denied or delayed employment as New York City firefighters due to decades of racial discriminatory conduct. The district court certified the class in a post-*Walmart v. Dukes* decision, granted summary judgment against the City on both intentional discrimination and disparate impact claims, and after trial ordered broad injunctive relief, including a new examination, revision of the application procedure, and continued monitoring by a court-appointed monitor for at least 10 years. The back pay and compensatory damage award will be determined in a subsequent ruling. In *Hohider v. United Parcel Services, Inc.*, No. 2:04-cv-00363-JFC (W.D. Penn.), Scott+Scott obtained significant structural changes to UPS's Americans with Disabilities Act compliance policies and monetary awards for some individual employees in settlement of a ground-breaking case seeking nationwide class certification of UPS employees who were barred from reemployment after suffering injuries on the job.

ATTORNEY BACKGROUND AND EXPERIENCE

MELVIN SCOTT is a graduate of the University of Connecticut (B.A. 1950) and the University of Kentucky (M.A. 1953; LL.B. 1957). Mr. Scott founded the firm in 1975. He formerly practiced in Kentucky and is presently admitted to practice in Connecticut and Pennsylvania. Mr. Scott was a member of the Kentucky Law Review, where he submitted several articles for publication. He has served as an Attorney Trial Referee since the inception of the program in the State of Connecticut and is a member of the Fee Dispute Committee for New London County. Mr. Scott also formerly served as a Special Public Defender in criminal cases and as a member of the New London County Grievance Committee. Mr. Scott actively represents aggrieved parties in securities, commercial and criminal litigation and served or serves as counsel in *Irvine, et al. v. ImClone Systems, Inc.*; *Schnall v. Annuity and Life Re (Holdings) Ltd.*; *In re 360networks Class Action Securities Litigation*; *In re General Motors ERISA Litigation*, and *Hohider v. UPS*, among others.

DAVID R. SCOTT is the managing partner of Scott+Scott. He represents multinational corporations, hedge funds, and institutional investors in high-stakes complex litigation, including antitrust, commercial, and securities actions.

Mr. Scott has received widespread recognition for his antitrust work. He has been elected to Who's Who Legal: Competition 2015, 2016, and 2017 which lists the world's top antitrust lawyers who are selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015.

Mr. Scott's antitrust experience includes matters dealing with unlawful price-fixing cartels, illegal tying, and anticompetitive monopolization. Currently, Mr. Scott is lead counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, a cartel action alleging a longstanding and widespread conspiracy to manipulate the foreign exchange market, in which billions in settlements have been announced to date. He is co-lead counsel in a class action case alleging that the world's largest banks and their broker, ICAP, entered a conspiracy to manipulate ISDAfix, a financial benchmark that is tied to over $379 trillion of outstanding interest-rate swaps around the world.

Mr. Scott's previous antitrust cases have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Capital Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for $600 million. He also played a leadership role in a lawsuit accusing Visa and MasterCard of engaging in anticompetitive conduct in setting credit card and debit card acceptance fees that recently settled for a record $7.25 billion. And he was lead counsel in *Red Lion Medical Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds, against mortgaged-backed securities trustees for failing to protect investors. Such cases include *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. The Bank of New York Mellon* (MBS sponsored by Countrywide Financial Corp.), No. 1:11-cv-05459 (S.D.N.Y.); *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America* (MBS sponsored by Washington Mutual Bank), No. 1:12-cv-02865 (S.D.N.Y.); and *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association* (MBS sponsored by Bear Stearns), No. 1:11-cv-08066 (S.D.N.Y.). He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

In addition, Mr. Scott has extensive experience litigating shareholder derivative cases, achieving substantial corporate governance reforms on behalf of his clients. Representative actions include: *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894 (N.D. Cal.) (settlement obtaining $54.9 million in financial benefits for the company, including $14.6 million in cash, and corporate governance reforms to improve stock option granting procedures and internal controls, valued at more than $150 million); *In re Qwest Communications International, Inc*., No. 01-RB-1451 (D. Colo.) (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence); *Plymouth County Contributory Retirement System v. Hasan*, No. 08-1022 (D.N.J.) (settlement requiring annual reporting to the company's board where any clinical drug trial is delayed, valued at between $50 million - $75 million); *Carfagno v. Schnitzer*, No. 08-cv-0912 (S.D.N.Y.) (settlement resulting in modification of terms of preferred securities issued to insiders, valued at $8 million); and *Garcia v. Carrion*, No. 09-cv-1507 (D.P.R.) (settlement achieving reforms aimed at rectifying internal control weaknesses and improving director education in accounting and ethics, valued at between $10 million - $15 million).

Mr. Scott is frequently quoted in the press, including in publications such as *The Financial Times*, *The Guardian*, *The Daily Telegraph*, *The Wall Street Journal*, and *Law360*. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.

Mr. Scott is admitted to practice in Connecticut, New York, the United States Tax Court, and numerous United States District Courts.

Mr. Scott is a graduate of St. Lawrence University (B.A., *cum laude*, 1986), Temple University School of Law (J.D., Moot Court Board, 1989), and New York University School of Law (LLM in taxation).

CHRISTOPHER M. BURKE chairs Scott+Scott's competition practice and sets the Firm's litigation standards. Mr. Burke's principal practice is in complex antitrust litigation, particularly in the financial services industry and he has served as lead counsel in some of the world's largest

financial services antitrust matters. He currently sits as a partner in the firm's San Diego and New York offices.

Currently, Mr. Burke is co-lead counsel in *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, 13-cv-7789 (S.D.N.Y.) ($2.3 billion settlement); and *Alaska Electrical Pension Fund v. Bank of America Corporation*, 14-cv-7126 (S.D.N.Y) (ISDAfix litigation) ($500 million settlement).

Mr. Burke has previously served as co-lead counsel in *Dahl v. Bain Capital Partners*, 07-cv-12388 (D. Mass.) ($590.5 million settlement); *Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC v. Barclays Bank PLC*, 15-cv-09323 (S.D.N.Y.) ($50 million settlement); *In re Currency Conversion Antitrust Litigation*, MDL No. 1409 (S.D.N.Y.) ($336 million settlement); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.) (over $5 billion settlement); *LiPuma v. American Express Co.*, Case No. 1:04-cv-20314 (S.D. Fla.) ($90 million settlement); and was one of the trial counsel in *Schwartz v. Visa*, Case No. 822505-4 (Alameda Cty. Super. Ct.) ($780 million plaintiff's judgment after six months of trial); and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 1030 (M.D. Fla.). Mr. Burke was one of the original lawyers in the *Wholesale Elec. Antitrust* cases in California, which settled for over $1 billion.

Further, Mr. Burke was trial counsel in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.). He was also co-lead counsel for indirect purchasers in *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891 (C.D. Cal.) ($86 million settlement), and *In re Prudential Ins. Co. of America SGLI/VGLI Contract Litigation*, No. 11-md-2208 (D. Mass.) ($40 million settlement). Mr. Burke also investigated and filed the first complaint in *In re Credit Default Swaps Antitrust Litigation*, 13-md-2476 (S.D.N.Y.).

Mr. Burke frequently lectures at professional conferences and CLEs on competition matters, including litigation surrounding financial benchmarks, class-barring arbitration clauses, the effects of *Twombly* in 12(b)(6) motions, and the increasing use of experts at class certification and trial. The American Antitrust Institute ("AAI") honored Christopher Burke and Scott+Scott Attorneys at Law with an *Outstanding Antitrust Litigation Achievement in Private Law Practice* award at their 2018 Antitrust Enforcement Awards for efforts in the *ISDAfix* litigation. In 2014, he was also recognized for his exemplary work in the *Dahl v. Bain Capital Partners* matter by the AAI and has regularly been designated as a Super Lawyer by Thomson Reuters.

Mr. Burke is a graduate of The Ohio State University (B.A. 1984), William & Mary (M.A. 1988), and the University of Wisconsin (M.A. 1989; J.D. 1993; Ph.D. 1996). He has also served as an Assistant Attorney General at the Wisconsin Department of Justice and has lectured on law-related topics, including constitutional law, law and politics, and civil rights at the State University of New York at Buffalo and at the University of Wisconsin. Mr. Burke's book, *The Appearance of Equality: Racial Gerrymandering, Redistricting, and the Supreme Court* (Greenwood, 1999), examines conflicts over voting rights and political representation within the competing rhetoric of communitarian and liberal strategies of justification.

Mr. Burke is admitted to practice by the Supreme Courts of the States of California, New York, and Wisconsin, and numerous United States District Courts and Courts of Appeal.

WALTER W. NOSS serves as the managing partner for Scott+Scott's San Diego office. He practices complex federal litigation with an emphasis on prosecuting antitrust actions on both a class-wide and individual, opt-out basis.

Currently, Mr. Noss represents class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate.

Mr. Noss represented class plaintiffs in *Dahl v. Bain Capital Partners LLC*, No. 1:07-cv-12388 (D. Mass.), a case challenging collusion among private equity firms. In *Dahl*, Mr. Noss served as one of the primary litigation counsel prosecuting the case, including deposing key managing directors, drafting dispositive motions, and arguing in court in opposition to defendants' summary judgment motions. The defendants in *Dahl* settled for $590.5 million.

Mr. Noss represented the indirect purchaser class plaintiffs in *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 2:12-cv-03824 (E.D. Pa.), a case challenging monopolistic conduct known as "product hopping" by the defendants. In *Mylan*, he was appointed sole lead counsel for the indirect class, and directed their prosecution and eventual settlement of the case for $8 million.

Mr. Noss also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum. He has previously represented out-out clients in *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.), which were cases involving price-fixing by horizontal competitors in the synthetic rubber industry.

Mr. Noss has experience successfully litigating in federal civil jury trials. In April 2011, Mr. Noss served as lead trial counsel in *Novak v. Gray*, No. 8:09-cv-00880 (M.D. Fla.), winning a $4.1 million jury verdict for breach of oral contract and fraudulent inducement. In December 2009, Mr. Noss served as plaintiffs' local counsel at trial in *Lederman v. Popovich*, No. 1:07-cv-00845 (N.D. Ohio), resulting in a $1.8 million jury verdict for plaintiffs on claims of breach of fiduciary duties, conversion, and unjust enrichment. In January and February 2006, Mr. Noss assisted the trial team for *In re Scrap Metal Antitrust Litigation*, No. 1:02-cv-0844 (N.D. Ohio 2006), resulting in a $34.5 million class action plaintiffs' verdict.

Mr. Noss graduated *magna cum laude* from the University of Toledo with a Bachelor of Arts in Economics in 1997 and *with honors* from The Ohio State University College of Law in 2000. He is a member of the California, New York, and Ohio Bars. Mr. Noss is also a member of the bars of the United States District Courts for the Northern, Central, and Southern Districts of

California, the Southern District of New York, and the Northern and Southern Districts of Ohio, as well as the United States Court of Appeals for the Sixth, Ninth, and Eleventh Circuits. Prior to joining Scott+Scott in April 2004, he was an associate in the Cleveland, Ohio office of Jones Day.

KRISTEN M. ANDERSON is a partner in the firm's New York office. Ms. Anderson's practice focuses on complex and class action litigation with an emphasis on antitrust matters. Ms. Anderson is recognized as a Rising Star in the 2014-15, 2015-16, and 2016-17 editions of Super Lawyers.

A substantial portion of Ms. Anderson's practice is devoted to antitrust cases within the financial services industry. Currently, Ms. Anderson represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) and *Axiom Investment Advisors, LLC, by and through its Trustee Gildor Management LLC v. Barclays Bank PLC*, No. 15-cv-9323 (S.D.N.Y.), cases alleging misconduct in the foreign exchange market by many global financial institutions. Ms. Anderson also represented pension funds and individual investors in *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) ($590.5 million settlement), an antitrust action alleging collusion in the buyouts of large publicly traded companies by private equity firms. Ms. Anderson also served on the trial team representing certified classes of cardholders in antitrust cases challenging class action-banning arbitration clauses in credit card agreements as restraints of trade in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Ms. Anderson is an active member of the American Bar Association's Antitrust Section. She served as Vice Chair of the Antitrust Section's Trial Practice Committee and was an editor of the Committee's newsletter, Trying Antitrust. She has also served as a Vice Chair of the Antitrust Section's Books & Treatises Committee. She has been a contributing author to the Antitrust Section's *Antitrust Discovery Handbook* (2d ed.), *Joint Venture Handbook* (2d ed.), and the *2010 Annual Review of Antitrust Law Developments*. In addition, Ms. Anderson served as an editor for *Model Jury Instructions in Civil Antitrust Cases* (2016 ed.). Ms. Anderson was a co-author of an article appearing in the Fall 2014 edition of *Competition: Journal of the Antitrust and Unfair Competition Section of the State Bar of California*, entitled *The Misapplication of Associated General Contractors to Cartwright Act Claims*, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014).

Ms. Anderson is a graduate of St. Louis University (B.A. Philosophy, *summa cum laude*, 2003) and the University of California, Hastings College of the Law (J.D. 2006). During law school, Ms. Anderson served as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco. While at Hastings, Ms. Anderson also served as an extern to Justice Kathryn Mickle Werdegar of the Supreme Court of California and was the research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.

Ms. Anderson is admitted to practice in California, New York, and the District of Columbia.

JOSEPH P. GUGLIELMO is a partner in the firm's New York office and represents

institutional and individual clients in antitrust, consumer, and securities litigation in federal and state courts throughout the United States and has achieved numerous successful outcomes.

Mr. Guglielmo, along with other attorneys at Scott+Scott, was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order of over $200 million from a Bernard Madoff feeder fund. Specifically, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo serves in a leadership capacity in a number of complex antitrust, securities, and consumer actions, including: *In Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-2800 (N.D. Ga.), co-lead counsel, claims on behalf of financial institutions involving data breach of personal and financial information of approximately 150 million consumers, *In Re: Disposable Contact Lens Antitrust Litigation*, No. 3:15-md-2626 (M.D. Fla.), co-lead counsel, claims on behalf of a class of contact lens purchasers alleging violations of the antitrust laws, *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.), co-lead counsel, $27.25 million settlement on behalf of financial institutions involving data breach and the theft of the personal and financial information of over 40 million credit and debit card holders; *In re Cigna Corporation PBM Litigation*, No. 3:16-cv-1702 (WWE) (D. Conn.), Chair of Executive Committee, asserting RICO and ERISA claims on behalf of nationwide class of plan participants involving overcharge of copayments for prescription drugs; *Forth v. Walgreen Co, Inc.*, No. 1:17-cv-02246 (N.D. Ill.), lead counsel, asserting claims on behalf of class of consumers alleging overcharge for medically necessary, covered prescription drugs, *Bellwether Community Credit Union v. Chipotle Mexican Grill, Inc.*, No. 1:17-cv-01102-WJM-STV (D. Colo.) co-lead counsel, on behalf of financial institutions involving data breach and the theft of the personal and financial information. Mr. Guglielmo is also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789-LGS (S.D.N.Y), which involves claims on behalf of purchasers of foreign exchange instruments alleging violations of federal antitrust laws.

Mr. Guglielmo has achieved significant victories and obtained numerous settlements for his clients. He was one of the principals involved in the litigation and settlement of *In re Managed Care Litigation*, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding $1 billion. Additional cases Mr. Guglielmo played a leading role and obtained substantial recoveries for his clients include: *Love v. Blue Cross and Blue Shield Ass'n*, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately $130 million and injunctive benefits valued in excess of $2 billion; *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1897 (D.N.J.), settlements in excess of $180 million; *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.), $59 million settlement achieved on behalf of financial institutions involving data breach of personal and financial information of approximately 110 million credit and debit cardholders; *Winsouth Credit Union v. Mapco Express Inc.*, No.: 3:14-cv-1573 (M.D. Tenn.), largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information; *Valle v. Popular Community Bank*, Case No. 653936/2012 (N.Y. Supreme Ct.), $5.2 million settlement

on behalf of consumers, *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of $40 million; *Bassman v. Union Pacific Corp.*, No. 97-cv-02819 (N.D. Tex.), $35.5 million securities class action settlement; *Garcia v. Carrion*, No. CV. 11-1801 (D. P.R.), substantial corporate governance reforms; *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.), $26 million securities class action settlement, *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.), $7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers, and *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.), $6.1 settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural." Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in *Hawaii Medical Association v. Hawaii Medical Service Association*, 113 Hawaii 77 (Haw. 2006), reversing the trial court's dismissal and clarifying rights for consumers under the state's unfair competition law.

Mr. Guglielmo lectures on electronic discovery and is a member of the Steering Committee of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property. Recently, Mr. Guglielmo was selected as a speaker for electronic discovery issues at the Sedona Conference as well as the Advanced eDiscovery Institute at Georgetown University Law Center. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to *The National Law Journal*'s "Plaintiffs' Hot List." In 2019, Mr. Guglielmo was again named by Super Lawyers as a top Antitrust lawyer in the New York metro area.

Mr. Guglielmo graduated from the Catholic University of America (B.A., *cum laude*, 1992; J.D., 1995) and also received a Certificate of Public Policy.

Mr. Guglielmo is admitted to practice before numerous federal and state courts: the United States Supreme Court, the United States Court of Appeals for the First Circuit, Second Circuit, Third Circuit, Eighth Circuit, Ninth Circuit and Eleventh Circuit, the United States District Courts for the Southern and Eastern Districts of New York, District of Massachusetts, District of Connecticut, District of Colorado, Eastern District of Wisconsin, New York State, the District of Columbia, and the Commonwealth of Massachusetts.

He is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, American Bar Association, and The Sedona Conference®.

WILLIAM C. FREDERICKS holds a B.A. (with high honors) from Swarthmore College, an M. Litt. in International Relations from Oxford University (England), and a J.D. from Columbia University Law School. At Columbia, Mr. Fredericks was also a three-time Harlan Fiske Stone Scholar, a Columbia University International Fellow, and the winner of the law school's Beck Prize (property law), Toppan Prize (advanced constitutional law) and Greenbaum Prize (written advocacy). A three-judge panel chaired by the late Justice Antonin Scalia also awarded Mr. Fredericks the Thomas E. Dewey Prize for the best oral argument in the final round of Columbia's Stone Moot Court Honor Competition.

After clerking for the Hon. Robert S. Gawthrop III (E.D. Pa.) in Philadelphia, Mr. Fredericks spent seven years practicing securities and complex commercial litigation at Simpson Thacher & Bartlett LLP and Willkie Farr & Gallagher LLP in New York before moving to the plaintiffs' side of the bar in 1996. Since 1996, Mr. Fredericks has represented investors as a lead or co-lead plaintiff in dozens of securities class actions, including *In re Wachovia Preferred Securities and Bond/Notes Litig*. (S.D.N.Y.) (total settlements of $627 million, reflecting the largest recovery ever in a pure Securities Act case not involving any parallel government fraud claims); *In re Rite Aid Securities Litig*. (E.D. Pa.) (total settlements of $323 million, including the then-second largest securities fraud settlement ever against a Big Four accounting firm); *In re Sears Roebuck & Co. Sec. Litig*. (N.D. Ill.) ($215 million settlement, representing the then-largest §10(b) class action recovery in an action that did not involve either a financial restatement or parallel government fraud claims); *In re State Street ERISA Litig*. (S.D.N.Y.) (one of the largest ERISA class settlements to date); *In re King Digital Sec. Enter. PLC S'holder Litig*. (Super. Ct. San Fran. Cty.) ($18.5 million settlement, representing one of the largest state court §11 class action recoveries to date); and *Irvine v. ImClone Systems, Inc*. (S.D.N.Y.) ($75 million settlement). Mr. Fredericks also played a leading role on the team that obtained a rare 9-0 decision for securities fraud plaintiffs in the U.S. Supreme Court in *Merck & Co., Inc. v. Reynolds* (which later settled for $1.052 billion), and has also coauthored amicus briefs in various other Supreme Court cases (including *Halliburton*, *Amgen*, *CALPERS v. ANZ Securities*, and *Cyan*) involving significant securities law issues.

At Scott+Scott, Mr. Fredericks' current cases include representing investors in several pending securities fraud actions, and in antitrust litigation against over a dozen leading banks based on their involvement in manipulating foreign exchange ("FX") rates and spreads.

Mr. Fredericks has been recognized in the 2012-18 editions of "America's Best Lawyers" in the field of commercial litigation, in "Who's Who in American Law" (Marquis), and in the New York City "SuperLawyers" listings for securities litigation. He has been a frequent panelist on various securities litigation programs sponsored by the Practising Law Institute (PLI) – including ten years as a panelist on civil liabilities under the Federal Securities Act – and has lectured overseas on American class action litigation on behalf of the American Law Institute/American Bar Association (ALI/ABA). He is also a member of the New York City Bar Association (former chair, Committee on Military Affairs and Justice), the Federal Bar Council and the American Bar Association.

SYLVIA M. SOKOL is a New York- and London-based partner in the firm's Antitrust and Competition Law Practice. She focuses on representing national and international clients in litigation involving domestic and international cartels. Ms. Sokol has substantial experience in all aspects of complex litigation, including the day-to-day management of cases. She also has substantial experience in counseling corporate clients, evaluating potential claims, and developing strategies to recoup losses stemming from anticompetitive conduct.

Ms. Sokol currently represents a nationwide class in price-fixing litigation regarding the $5.3 trillion-a-day foreign exchange market. She also represents a proposed nationwide class in an action involving ISDAfix, a financial benchmark that is tied to over $379 trillion of interest-rate swaps around the world. In addition, Ms. Sokol represents several large multinational

corporations alleging that Goldman Sachs, JPMorgan, Glencore, and their warehouse affiliates conspired to restrict the supply of aluminum in London Metal Exchange-approved warehouses. And she represents several government entities in a national lawsuit alleging bid-rigging in the municipal derivatives market.

In addition, Ms. Sokol's civil litigation experience has involved defending corporate clients charged with unlawful business practices and monopolizations. She has also represented clients in criminal and extradition matters.

Ms. Sokol was selected for the International Who's Who of Competition Lawyers & Economists and for Competition - U.S. in 2016, 2017, and 2018. Honorees are selected based on comprehensive and independent survey responses received from general counsel and private practitioners around the world. She has been selected to be a Fellow in The Trial Lawyer Honorary Society of the Litigation Counsel of America, which is a trial lawyer honorary society composed of less than one-half of one percent of American lawyers. *Lawyer Monthly* magazine awarded her the Women in Law Award 2017. She was also named a "Super Lawyer" in 2014, 2015, 2016, 2017, and 2018 Super Lawyers New York Metro Edition, and was named a"Super Lawyer" in 2011-2012, Super Lawyers Northern California Edition.

She is a 1998 graduate of the New York University School of Law (*cum laude*), and completed her undergraduate studies at the University of British Columbia. After law school, Ms. Sokol was awarded the Soros Justice Fellowship to serve a year in the Capital Habeas Unit of the Federal Public Defender's Office, where she represented clients condemned to death and developed training materials for members of the capital defense bar. She then served as a judicial law clerk to the Honorable Warren J. Ferguson, United States Court of Appeals for the Ninth Circuit, before spending several years working at Morrison & Foerster LLP.

Ms. Sokol is a member of the American Bar Association and is admitted to practice in New York, California, and the District of Columbia. She is also admitted to the Southern District of New York, the Northern, Southern, and Eastern Districts of California, as well as the United States Supreme Court.

She is bilingual in English and French, and holds French and United States citizenships.

PETER A. BARILE III is a partner in Scott+Scott's competition practice. His focus is on complex antitrust and commodity litigation.

Mr. Barile has extensive experience representing clients on both sides of the docket in a variety of industries and contexts, from consumers and investors to institutions and corporations, whether as individual plaintiffs, class plaintiffs, opt-outs, or defendants in complex matters. Prior to joining the firm, he practiced both in New York and in Washington D.C., with major law firms renowned for their historically leading antitrust practices.

Mr. Barile devotes a substantial amount of his practice to federal antitrust and commodity class action litigation involving the financial services industry in the Southern District of New York. Mr. Barile is or has been involved in representing investor rights in major cases involving

commodities and financial benchmarks, including: *Aluminum*, *Cotton*, *Crude Oil*, *FX*, *Gold*, *ISDAfix*, *LIBOR*, *Silver*, and *Zinc*.

He also has significant experience litigating high-tech antitrust cases in the Northern District of California, including *In re Online DVD Antitrust Litigation*; *In re Lithium Ion Batteries Antitrust Litigation*; and *In re High Tech Employees Antitrust Litigation*.

In addition to his work in federal district trial courts, Mr. Barile has considerable experience in other arenas, including the Judicial Panel on Multidistrict Litigation, federal Circuit Courts of Appeal, and the United States Supreme Court.

Mr. Barile is active in the antitrust bar, having held a number of leadership posts in the ABA and other organizations. He serves on the Advisory Board of the Loyola Institute for Consumer Antitrust Studies. Mr. Barile has published numerous articles and served as a panelist or speaker on antitrust issues. His work has been cited by the Federal Trade Commission and the Antitrust Modernization Commission, as well as leading academics and practitioners.

Mr. Barile also has helped nonprofit advocacy groups be heard in matters of national importance as Friends of the Court in major cases before the United States Supreme Court. His work has included *Leegin Creative Leather Products, Inc. v. PSKS, Inc.*, 551 U.S. 877 (2007), in which he served as lead counsel for *amicus curiae* Consumer Federation of America in a landmark antitrust case on resale price fixing, and *Giles v. State of California*, 554 U.S. 353 (2008), in which he served as lead counsel for *amicus curiae* Battered Women's Justice Project, in a case concerning the scope of the Confrontation Clause of the United States Constitution.

Mr. Barile earned his law degree in 1999 from the University of Connecticut School of Law, *magna cum laude*, where he was an Editor of the Connecticut Law Review and Moot Court Champion. His bachelor's degree is from the University of Connecticut.

Mr. Barile is a member of the bars of New York, Connecticut, and the District of Columbia. He is admitted to practice in the United States District Courts for the Southern District of New York, Eastern District of New York, District of Columbia, Northern District of Illinois, District of Connecticut; United States Courts of Appeal for the Second, Fourth, Sixth, Seventh, Ninth, Federal, and District of Columbia Circuits, and the Supreme Court of the United States.

BELINDA HOLLWAY is the head of Scott+Scott's office in London. She has over a decade of competition law experience, and specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal, particularly on behalf of multinational corporations in follow-on damages claims. She has extensive expertise in developing and coordinating multijurisdictional litigation strategies, both within Europe and beyond. She also represents investors in shareholder litigation.

Prior to joining Scott+Scott, Ms. Hollway spent nine years in the London office of Freshfields Bruckhaus Deringer LLP. She represented clients across a wide range of industries, acting in many of the leading English competition damages cases, such as *Cooper Tire*, relating to the synthetic rubber cartel, and *National Grid v. ABB*, relating to the cartel in gas insulated switchgear. She was the lead associate on the defence team in *Enron v. EWS*, which was the first

follow-on damages claim ever to reach trial in the Competition Appeal Tribunal. Her wide experience on the defence side gives her a special insight into the issues that claimants must address and overcome in order to recoup losses stemming from breaches of competition law in Europe.

Ms. Hollway has also acted for numerous clients in competition law investigations, both internal investigations and those brought by the UK Office of Fair Trading (now the Competition and Markets Authority) and the European Commission. She has been involved in immunity applications, Commission cartel settlements, and contested cases. From this work, she has an in-depth understanding of the interaction between private and public enforcement in Europe and the ramifications that public enforcement has for the strategy and progression of damages claims.

Ms. Hollway attended the Australian National University and graduated in 2001 with a First Class Honours degree in History and a First Class Honours Degree and University Medal in Law. She then spent a year as an Associate to Her Honour Justice Catherine Branson at the Federal Court of Australia and then worked for the competition and litigation teams of Allens Arthur Robinson in Sydney, prior to moving to the United Kingdom in 2006. She has a Master's Degree in Competition Law from King's College London.

She has published on competition law issues, including in relation to the EU Damages Directive and has been quoted in the press on competition law in Europe.

Ms. Hollway is admitted to practice in England and Wales and in New South Wales, Australia.

BETH A. KASWAN, during her tenure as an Assistant U.S. Attorney and subsequent promotions to Chief of the Commercial Litigation Unit and Deputy Chief of the Civil Division of the U.S. Attorney's Office for the Southern District of New York, was appointed by the FDA as lead counsel in litigation to enjoin the manufacture of adulterated generic drugs in the landmark case *United States v. Barr Laboratories, Inc.*, 812 F. Supp. 458 (D.N.J. 1993). Ms. Kaswan, who began her career as an accountant at the offices of Peat, Marwick, Mitchell & Co., and then worked as a civil trial attorney at the U.S. Department of Justice in Washington, D.C., is the recipient of several awards from the Justice Department and other agencies she represented, including the Justice Department's John Marshall award, Special Commendation from the Attorney General, a Superior Performance award from the Executive Office of U.S. Attorneys and Tax Division Outstanding Achievement awards.

While at Scott+Scott, Ms. Kaswan served as lead counsel in *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass Through Certificates*, No. 09-cv-00037 (W.D. Wa.), the WaMu RMBS Section 11 Securities Act case which settled after plaintiffs succeeded in defeating the defendants' motion for summary judgment, only weeks before it was scheduled to proceed to a jury trial. Ms. Kaswan just completed the nine-week trial in *In the Matter of the Application of The Bank of New York Mellon*, Index No. 651786/2011 (N.Y. Supr. Ct.) in which she and other interveners challenged the proposed settlement between Bank of New York Mellon and Bank of America to resolve repurchase and servicing claims for 530 Countrywide trusts. She and others at Scott+Scott recently settled federal and state law claims against the Securitization Trustees for WaMu and Bear Stearns Trusts in *Policemen's Annuity and Benefit*

Fund of the City of Chicago v. Bank of America, N.A., No. 12-cv-2865 (S.D.N.Y.) and *Oklahoma Police Pension and Retirement System v. U.S. Bank N.A.*, No. 11-cv-8066 (S.D.N.Y.), respectively. Ms. Kaswan brought a derivative suit on behalf of New York University against Ezra Merkin to freeze funds belonging to a feeder fund to Bernard Madoff. She also served as lead counsel to another shareholder derivative case, *Carfagno v. Schnitzer*, No. 08-CV-912-SAS (S.D.N.Y.), where she successfully negotiated a settlement on behalf of Centerline Holding Company and Centerline shareholders. Ms. Kaswan has served as lead counsel in *Cornwell v. Credit Suisse Group*, No. 08-cv-3758 (S.D.N.Y.) and *In re Tetra Technologies, Inc. Securities Litigation*, No. 08-cv-0965 (S.D. Tex.), among others.

Ms. Kaswan is a member of the New York and Massachusetts bars. Ms. Kaswan has been practicing law for over 35 years and is a partner in the firm's New York office.

JUDY SCOLNICK is a partner in the firm's New York office. Ms. Scolnick is a graduate of New York University (B.A., *cum laude* 1972), Brandeis University (M.A. Political Science Theory, 1973), and Boston College Law School (J.D., 1976), where she served on the Boston College Industrial and Commercial Law Review. She has extensive experience in the fields of shareholder derivative law, particularly in the pharmaceutical industry, employment law and employment class actions, and securities class actions. She has contributed substantially to recent jurisprudence expanding shareholders' rights to examine books and records of the corporations in which they hold stock. In *Cain v. Merck & Co., Inc.*, 415 N.J. Super. 319 (N.J. Super. A.D. 2010), the New Jersey Appellate Division agreed with Ms. Scolnick and held in a precedential decision that the New Jersey Business Corporation Act allows shareholders to inspect the minutes of board of directors and executive committee meetings upon a showing of proper purpose. In *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Supr. 2011), the Delaware Supreme Court ruled in a ground-breaking decision that plaintiffs may, in certain circumstances, inspect a corporation's books and records to bolster a shareholder derivative complaint even after they have filed a lawsuit.

She has served as lead counsel in many shareholder derivative actions and is currently lead counsel in *North Miami General Employees Retirement Fund v. Parkinson*, No. 10-cv-6514 (N.D. Ill.), a shareholder derivative case on behalf of pharmaceutical company, Baxter International, arising from the Board's failure to comply with FDA orders to remediate a medical device known as the Colleague Pump. She is also lead counsel in *Cottrell v. Duke*, No. 12-4041 (W.D. Ark.), a shareholder derivative action brought on behalf of Wal-Mart arising from a widespread bribery and cover-up conspiracy conducted by Wal-Mart executives and Board members.

Ms. Scolnick has experience litigating shareholder derivative actions at both the trial and appellate level. She successfully argued the Baxter appeal where the Court of Appeals for the Seventh Circuit, reversing a trial court's dismissal, held that a pension fund's complaint on behalf of all shareholders passed the pre-suit demand futility threshold test under Delaware substantive law. *Westmoreland County Employees' Retirement System v. Parkinson*, 727 F.3d 719 (7th Cir. 2013). Also in 2013, Ms. Scolnick obtained a landmark ruling in the Wal-Mart shareholder derivative litigation from the Court of Appeals for the Eighth Circuit. The Eighth Circuit reversed the district court's stay of the federal action in favor of a related proceeding in

Delaware Chancery Court, and held that a *Colorado River* stay is never appropriate where the federal complaint alleges valid, exclusive federal claims. *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013).

Ms. Scolnick has also litigated a number of important employment discrimination class actions. These include *U.S. v. City of New York*, No. 07-cv-2067, 2011 WL 4639832 (E.D.N.Y. Oct. 5, 2011) (successfully representing a class of black applicants for entry-level firefighter jobs who were discriminated against by the City of New York), *Hohider v. UPS*, 243 F.R.D. 147 (W.D. Pa. 2007), *reversed and remanded*, 574 F.3d 169 (3d Cir. 2009), where although the Third Circuit reversed certification of a nationwide class of Americans with Disabilities Act protected UPS employees, Ms. Scolnick was able to negotiate with UPS changes to its return to work policy with regard to injured workers.

Ms. Scolnick began her career by serving as a law clerk to the late Honorable Anthony Julian of the United States District Court in Massachusetts. Thereafter, she served as a trial attorney in the Civil Division of the United States Department of Justice, where she was lead counsel in several high-profile employment discrimination lawsuits against various U.S. agencies around the country.

Ms. Scolnick has been selected for the past two years in Thompson Reuter's "New York Super Lawyers."

Ms. Scolnick is admitted to practice in New York, New Jersey, and Massachusetts.

DONALD A. BROGGI is a partner in the firm's New York office. Mr. Broggi is a graduate of the University of Pittsburgh (B.A., 1990) and Duquesne University School of Law (J.D., 2000). He is engaged in the firm's complex securities, antitrust, and consumer litigation, including: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *In re: Priceline.com Inc. Securities Litigation*, No. 00-cv-1884 (D. Conn.), *Irvine v. ImClone Systems, Inc.*, No. 02-cv-0109 (S.D.N.Y.), *In re: Rubber Chemicals Antitrust Litigation*, No. C04-01648 (N.D. Cal.), *In re: Plastics Additives Antitrust Litigation*, No. 03-cv-2038 (E.D. Pa.), and *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash.), among others.

Mr. Broggi also works with the firm's institutional investor clients, including numerous public pension systems and Taft-Hartley funds throughout the United States to ensure their funds have proper safeguards in place to ensure against corporate malfeasance. Similarly, Mr. Broggi consults with institutional investors in the United States and Europe on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.

Mr. Broggi is admitted to practice in New York and Pennsylvania.

DEBORAH CLARK-WEINTRAUB is a partner in the firm's New York office. Ms. Weintraub graduated from St. John's University, Queens, New York (B.A., *summa cum laude*, 1981; President's Award in recognition of achieving highest GPA among graduates of St. John's College of Liberal Arts and Science) and Hofstra Law School in Hempstead, New York (J.D., with distinction, 1986). While in law school, Ms. Weintraub was a member and research editor of the Hofstra Law Review. Following her graduation from Hofstra Law School, Ms. Weintraub served as a law clerk to the Honorable Jacob Mishler, United States District Judge for the Eastern District of New York (1986-1987). Ms. Weintraub is a member of the New York bar.

Ms. Weintraub has extensive experience in all types of class action litigation. Ms. Weintraub has served as lead counsel for investors in mortgage-backed securities (MBS) in litigation against MBS trustees for failure to pursue repurchase remedies with respect to mortgage loans in MBS trusts that breached representations and warranties. These matters include *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.), which recovered $69 million for investors.

Ms. Weintraub is also currently representing investors in several ongoing securities class action cases including *Weston v. RCS Capital Corporation*, 1:14-cv-10136 (S.D.N.Y.); *ECD Investor Group v. Credit Suisse International*, 14-cv-8484 (S.D.N.Y.); and *In re Conn's, Inc. Sec. Litig.*, No. 4:14-cv-00548 (S.D. Tex.).

Ms. Weintraub has extensive securities class action experience and has acted as plaintiffs' co-lead counsel in numerous cases that have obtained substantial recoveries for defrauded investors. Ms. Weintraub was one of the lead counsel in *In re Oxford Health Plans, Inc. Securities Litigation*, MDL No. 1222 (S.D.N.Y.), in which a cash settlement of $300 million was obtained on the eve of trial after more than five years of litigation. At the time, the $300 million cash recovery was one of the largest recoveries ever achieved in a securities class action. The Honorable Charles L. Brieant, Jr., who presided over this case described it as "perhaps the most heavily defended, ardently pursued defense of a similar case that I can recall." Ms. Weintraub also served plaintiffs' co-lead counsel in *In re CVS Corporation Securities Litigation*, No. 01-11464 (D. Mass.), in which a cash settlement of $110 million was obtained for investors. Following the settlement in March 2006, CVS disclosed that the SEC had opened an inquiry into the manner in which CVS had accounted for a barter transaction, a subject of the class action suit, and that independent counsel to the firm's audit committee had concluded in December 2005 that various aspects of the company's accounting for the transaction were incorrect, leading to the resignations of the company's controller and treasurer.

Ms. Weintraub is the co-author of "Gender Bias and the Treatment of Women as Advocates," Women in Law (1998), and the "Dissenting Introduction" defending the merits of securities class action litigation contained in the 1994 monograph "Securities Class Actions: Abuses and Remedies," published by the National Legal Center for the Public Interest. She is a member of the Association of the Bar of the City of New York.

DARYL F. SCOTT graduated in 1981 from Vanderbilt University with a Bachelor of Arts in Economics. He received his Juris Doctorate from Creighton University School of Law in 1984, and a Masters of Taxation from Georgetown University Law Center in 1986. Mr. Scott is a partner involved in complex securities litigation at Scott+Scott. In addition to his work with the firm, Mr. Scott has specialized in private foundation and ERISA law. He was also formerly an executive officer of a private equity firm that held a majority interest in a number of significant corporations. Mr. Scott is admitted to the Supreme Court of Virginia and a member of the Virginia Bar Association and the Connecticut Bar Association.

DEIRDRE DEVANEY is a graduate of New York University (B.A., *cum laude*, 1990) and the University of Connecticut School of Law (J.D., with honors, 1998) where she was the managing editor of the Connecticut Journal of International Law. Ms. Devaney's experience includes commercial and probate litigation, as well as trusts and estates. Currently, Ms. Devaney's practice areas include commercial and securities litigation, including: *In re Priceline.com, Inc. Securities Litigation*, among others. Ms. Devaney is admitted to practice in Connecticut, New York, and the United States District Court for the District of Connecticut.

GEOFFREY M. JOHNSON is a partner in the firm's Ohio office. Mr. Johnson's practice focuses on shareholder derivative, corporate governance, and securities class action litigation. Mr. Johnson is also active in the firm's settlement and appellate practice groups.

Mr. Johnson has served as lead or co-lead counsel in several securities class action cases brought under Section 11 of the Securities Act of 1933, including *In re King Digital Entertainment plc Shareholder Litigation*, Case No. 15-544770 (Superior Court of California, San Francisco County), a shareholder lawsuit that settled for $18.5 million after suriving two separate motions to dismiss, and *Rosenberg v. Cliffs Natural Resources, Inc.*, Case No. 14-1531 (Court of Common Pleas, Cuyahoga County, Ohio), a shareholder lawsuit that settled for $10 million after the firm had engaged in extensive litigation and motion practice.

Mr. Johnson has been active in the firm's mortgage-backed securities litigation practice, serving as lead or co-lead counsel in mortgage-backed securities class action cases involving Washington Mutual (*In re Washington Mutual Mortgage-Backed Securities Litigation*, 2:09-cv-00037 (W. D. Wash.)) and Countrywide Financial (*Putnam Bank v. Countrywide Financial, Inc.*, No. 10-cv-302 (C.D. Cal.)). Mr. Johnson also helped develop the theories that the firm's pension fund clients have used to pursue class action cases against mortgage-backed security trustees. *See Retirement Board of the Policemen's Annuity & Benefit Fund of the City of Chicago v. Bank of New York Mellon* (Case No. 11-cv-05459 (S.D.N.Y.)); *Oklahoma Police Pension & Retirement System v. U.S. Bank NA* (Case No. 11-cv-8066 (S.D.N.Y.)).

Mr. Johnson has also served as lead or co-lead counsel in other major securities and ERISA cases, including: *In re Royal Dutch/Shell ERISA Litigation*, No. 04-1398 (D.N.J.), which settled for $90 million and is one of the three largest recoveries ever obtained in an ERISA class action case; *In re Priceline Securities Litigation*, 00-cv-1884 (D. Conn.), which settled for $80 million and is the largest class action securities settlement ever obtained in the State of Connecticut; and *In re General Motors ERISA Litigation*, 05-cv-71085 (E.D. Mich.), a case that settled for $37.5 million and ranks among the largest ERISA class settlements ever obtained.

Mr. Johnson is a graduate of Grinnell College (B.A., Political Science with Honors, 1996) and the University of Chicago Law School (J.D., with Honors, 1999), where he served on the law review. Prior to joining Scott+Scott, Mr. Johnson clerked for the Honorable Karen Nelson Moore, United States Court of Appeals for the Sixth Circuit.

AMANDA F. LAWRENCE is a partner in the firm's Connecticut office. Ms. Lawrence is a graduate of Dartmouth College (B.A., *cum laude*, 1998) and Yale Law School (J.D., 2002). Ms. Lawrence has been at the firm since 2007 where she splits her time between antitrust and securities matters.

In the antitrust realm, Ms. Lawrence has been intricately involved in the "ISDAFix case" (*Alaska Electrical Pension Fund v. Bank of America*, 1:14-cv-07126-JMF-OTW (S.D.N.Y)), taking depositions and working through expert discovery, including numerous *Daubert* motions and responses. That case has to date achieved over $504.5 million in recovery from large financial institutions for investors. Ms. Lawrence is also a principal attorney litigating *Axiom Investment Advisors, LLC v. Deutsche Bank AG*, 1:15-cv-09945-LGS (S.D.N.Y.), which alleges manipulation of trading algorithms to benefit the defendant financial institution. She likewise has managed complex international investigations into suspected collusion or manipulation of financial markets. For example, she devoted herself to the international investigation of SSA bonds, which included multiple interviews with former managers of trading banks as well as extensive work with New York University professors to analyze trading data and unearth manipulation.

In her securities practice, Ms. Lawrence has worked on numerous Exchange Act and 1933 Act cases that have resulted in substantial settlements, including: *Police and Fire Retirement System of the City of Detroit v. Crane*, No. 13-cv-00945-VC (N.D. Cal.) ($5.1 million settlement); *Rosenberg v. Cliffs Natural Resources, Inc.*, No. CV-14-828140 (Ohio Com. Pleas) ($10 million settlement in 1933 Act case); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) ($26 million securities class action settlement); and *In re TETRA Technologies, Inc. Securities Litig.*, No. 07-cv-00965 (S.D. Tex.) ($8.25 million securities class action settlement); *In re LendingClub Corporation Shareholder Litig.*, No. CIV 537300 (Cal. Super., San Mateo) ($125 million securities class action settlement); and *In Re: FireEye, Inc. Securities Litig.*, No. 1-14-cv-066866 (Cal. Super., Santa Clara) ($10.25 million securities class action settlement).

In addition to antitrust and securities matters, Ms. Lawrence has also worked on consumer cases that have resulted in significant settlements for the affected classes. For example, Ms. Lawrence helped achieve a settlement in *Vulcan Society, Inc. v. The City of New York*, No. 07-CV-2067 (E.D.N.Y.) that brought both monetary and injunctive relief to a class of African American and Hispanic firefighters in New York City, as well as a settlement in *In re Prudential Insurance Company of America SGLI/VGLI Contract Litigation*, No. 3:11-md-02208-MAP (D. Mass.) that brought both forms of relief to relatives of deceased servicemen and women.

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events. A five-time NCAA National Champion cyclist who has raced throughout the United States,

Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. She has competed in dozens of marathons, including the New York City Marathon and the Boston Marathon, and in 16 full-distance Ironman competitions – four of which were at the Ironman World Championships in Kona, Hawaii.

She is licensed to practice in Connecticut and Massachusetts, as well as the District of Connecticut, District of Massachusetts, and the Southern District of New York. Additionally, she is admitted to the Ninth and First Circuit Courts of Appeals, before which she has argued.

ERIN GREEN COMITE is a partner in the firm's Connecticut office. Ms. Comite is a graduate of Dartmouth College (B.A., *magna cum laude*, 1994) and the University of Washington School of Law (J.D., 2002). Ms. Comite litigates complex class actions throughout the United States, representing the rights of shareholders, employees, consumers, and other individuals harmed by corporate misrepresentation and malfeasance.

Ms. Comite currently serves in a leadership role in a number of complex class actions including: *First Choice Federal Credit Union v. The Wendy's Company* (W.D. Pa.), co-lead counsel on behalf of financial institutions arising out of data breach; *In Re Arby's Restaurant Group, Inc. Litigation* (N.D. Ga.), member of Plaintiffs' Executive Committee on behalf of financial institutions arising out of a data breach and *In Equifax, Inc. Customer Data Security Breach Litigation*, No. 1:17-md-2800 (N.D. Ga.).

Recently, Ms. Comite has played a significant role in the prosecution of consumer class cases such as: *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) ($27.25 million settlement) and *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) ($59 million settlement), two of the largest data breaches impacting consumer personal data to date; *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 15-cv-02228 (N.D. Ill.), Chair of the Plaintiffs' Steering Committee ($8.1 million settlement), *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) ($6.1 settlement), *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) ($7.3 million settlement); and *In re Nutella Mktg. & Sales Practices Litig.*, No. 11-cv-01086 (D.N.J.) ($2.5 million settlement). Ms. Comite's appellate victories in consumer class actions include *Chavez v. Nestle USA, Inc.*, 511 F. App'x 606 (9th Cir. 2013) (achieving a reversal of dismissal), and *In re Nutella Mktg. & Sales Practices Litig.*, 2014 WL 4801262 (3d Cir. Sept. 29, 2014) (defending settlement from professional objectors).

Since joining Scott+Scott in 2002, she has litigated such cases as *In re Priceline.com Securities Litigation* ($80 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.* ($27 million settlement); and *In re Qwest Communications International, Inc.* (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence). While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In *Hohider v. United Parcel Service, Inc.*, Ms. Comite spearheaded a nearly year-long investigation into every facet of UPS's preservation methods, requiring intensive, full-time efforts by a team of attorneys and paralegals well beyond that required in the normal course of pre-trial litigation. Ms. Comite assisted in devising the plan of investigation in weekly conference calls with the

Special Master, coordinated the review of over 30,000 documents that uncovered a blatant trail of deception and prepared dozens of briefs to describe the spoliation and its ramifications on the case to the Special Master. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the Court conditioned the parties' settlement of the three individual ADA case on UPS adopting and implementing preservation practices that passed the approval of the Special Master.

Prior to entering law school, Ms. Comite served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.

Ms. Comite's volunteer activities have included assisting immigrant women, as survivors of domestic violence, with temporary residency applications as well as counseling sexual assault survivors. Currently, Ms. Comite supports Connecticut Children's Medical Center and March of Dimes/March for Babies.

Ms. Comite is licensed to practice in the State of Connecticut and is admitted to practice in the U.S. District Court for the District of Connecticut, the Southern District of New York, the District of Colorado, the Eastern District of Wisconsin, and the U.S. Court of Appeals for the Second, Third, Ninth, and Eleventh Circuits.

THOMAS LAUGHLIN is a partner in the firm's New York office. Mr. Laughlin is a graduate of Yale University (B.A. History, *cum laude*, 2001) and New York University School of Law (J.D., *cum laude*, 2005). After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

Mr. Laughlin's practice focuses on securities class action, shareholder derivative, ERISA and other complex commercial litigation. While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including *Cornwell v. Credit Suisse,* No. 08-3758 (S.D.N.Y.) (securities settlement of $70 million), *Rubenstein v. Oilsands Quest Inc.,* No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million) *Plymouth County Contributory Ret. Sys. v. Hassan,* No. 08-1022 (D.N.J.) (corporate governance reform); and *Garcia v. Carrion,* No. 09-1507 (D.P.R.) (corporate governance reform). Mr. Laughlin is a member of the New York bar and is admitted to practice in the Southern District of New York and the Eastern District of New York.

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including *Cottrell v. Duke,* 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Retir. Sys. v. Parkinson*, 727 F.3d 719 (7th Cir. 2013); *Pfeil v. State Street Bank and Trust Co.,* 671 F.3d 585 (6th Cir. 2012); and *King v. VeriFone Holdings, Inc*., 12 A.3d 1140 (Del. Supr. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in *Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC*, No. 12-cv-00127 (D. Me.). Mr. Laughlin represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and directors of a bank and its auditor in connection with an $18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

MAX SCHWARTZ is a partner based in New York. His main practice area is complex civil litigation, with an emphasis on financial products and services. He also counsels investment firms and institutional investors on strategies to enhance returns, or recoup losses, through a variety of legal actions.

Following the financial crisis, Mr. Schwartz served as lead counsel in several cases that set important precedents regarding mortgage-backed securities. He argued the first cases to find that securitization trustees must seek to have defective mortgages repurchased from MBS trusts. These efforts recently led to the recovery of $69 million for investors in Washington Mutual MBS and $6 million for investors in Bear Stearns MBS. *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.); *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association*, 1:11-cv-8066 (S.D.N.Y.).

Currently, Mr. Schwartz represents investment firms pursuing claims against MBS servicers. He also represents plaintiffs in a securities action against Nicholas Schorsch and RCS Capital Corp., among others. *Weston v. RCS Capital Corp.*, 1:14-cv-10136 (S.D.N.Y.).

Mr. Schwartz has substantial experience in competition and antitrust matters as well. He was part of the team that secured a $590 million settlement stemming from allegations that several of the largest leveraged buyouts were subject to collusion. *Dahl v. Bain Capital Partners, LLC*, 1:07-cv-12388 (D. Mass.). In addition, Mr. Schwartz has advised clients in antitrust matters ranging from pharmaceuticals to precious metals and has advised companies seeking merger review before a number of regulatory agencies.

Super Lawyers named Mr. Schwartz a Rising Star. The Legal Aid Society also recognized him with a Pro Bono Service Award for work before the New York Court of Appeals.

Mr. Schwartz holds a B.A. from Columbia University (*cum laude*), and a J.D. from New York University School of Law.

DAVID HOWE is a competition, EU and public lawyer, and Senior Counsel at Scott+Scott Europe. He trained at Freshfields Bruckhaus Deringer LLP and, after qualification, spent a further eight years in the competition and dispute resolution teams there.

David has acted for a range of multinational clients on the full spectrum of competition investigations (in both the UK and internationally) litigation and advice. He has conducted competition damages claims in the English High Court, Court of Appeal and Competition

Appeal Tribunal, and also appeared in the European Court of Justice. He acted for Roche on its defence of litigation arising out of the Vitamins cartel (including in the Devenish litigation, which ruled on the availability of restitutionary and exemplary damages in follow-on claims) and, for EWS in its defence of claims brought by the administrators of Enron for damage following EWS' abuse of dominance (the first follow-on damages action to go to trial in the Competition Appeal Tribunal). He has published several articles on competition law, including in relation to the new EU Damages Directive.

David also has significant wider expertise, including in bribery, public and regulatory law, and human rights matters. For instance, he was the lead associate co-ordinating a multi-jurisdictional regulatory and public law strategy for a major consumer products company, and has acted on a number of judicial reviews for a range of clients, including (as lead associate) on a significant judicial review of the lawfulness of domestic consumer products legislation, relying primarily on EU free movement and human rights grounds. In addition to "classic" human rights claims, David also has expertise in the evolving body of hard and soft law arising out of the UN "Ruggie Principles" on Business and Human Rights, having assisted a major technology company on a full Ruggie-compliant assessment of, and mitigation strategy for, a new project.

David attended Oxford University. He studied Law and French Law, was appointed a scholar, and graduated in 2003 with First Class Honours (being placed in the top 3% of his year), and a Diploma in French Law from the Universite Pantheon-Assas (Paris II). After a year completing professional qualifications, he returned to Oxford University to study the BCL (Oxford University's LLM equivalent), graduating in 2005 with a Distinction and a university prize, and was subsequently short-listed for the All Souls Prize Fellowship. In the early years of his practice at Freshfields, David also completed an LLM in European Law at Kings College London.

TOM SOUTHWELL is a partner in Scott+Scott Europe LLP's London office.

Tom specialises in international arbitration and has represented individuals, corporate clients, and financial institutions in arbitration proceedings under the rules of the major arbitral institutions and before all levels of the English Courts. He has particular expertise in the oil and gas, energy and financial services sectors, and in relation to disputes arising out of share sale transactions, joint ventures, and civil fraud.

Tom also acts in competition damages litigation and is currently acting for a number of potential claimants in follow-on damages actions arising from the Trucks cartel.

Before joining Scott+Scott, Tom was a member of the International Litigation and Arbitration group at Skadden, Arps, Slate, Meagher & Flom (UK) LLP, in London.

DAVID H. GOLDBERGER is an associate in Scott+Scott's San Diego office. Currently, Mr. Goldberger's practice is focused on antitrust litigation, initial case investigations, and other special projects.

Representative actions include *Kleen Products LLC v. Packaging Corporation of America*, No. 10-cv-5711 (N.D. Ill.), an action challenging price-fixing in the containerboard industry, and *In*

re Lithium Ion Batteries Antitrust Litig., No. 13-md-2420 (N.D. Cal.), an action challenging price-fixing of Li-Ion batteries. Mr. Goldberger has also worked on antitrust cases involving delayed generic drug entry, such as *Mylan Pharmaceuticals Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-cv-3824 (E.D. Pa.) ($8 million settlement) and *In re Prograf Antitrust Litig.*, No. 1:11-md-02242 (D. Mass.).

Previously, Mr. Goldberger was active in Scott+Scott's securities fraud and ERISA practice, including *In re: Priceline.com Securities Litigation*, 03-cv-1884 (D. Conn.) ($80 million settlement), *Alaska Electrical Pension Fund v. Pharmacia Corporation*, No. 03-1519 (D.N.J.) ($164 million settlement), and *In re: General Motors ERISA Litigation*, No. 05-71085 (E.D. Mich.) (resulting in significant enhancements to retirement plan administration in addition to $37.5 million settlement for plan participants).

Mr. Goldberger was also a member of Scott+Scott's institutional investor relations staff, providing the Firm's many institutional clients with assistance in various matters pertaining to their involvement in complex civil litigations.

Mr. Goldberger is also a frequent contributing author to Market+Litigation, Scott+Scott's monthly client newsletter.

Mr. Goldberger graduated from the University of Colorado (B.A., 1999) and California Western School of Law (J.D., 2002). Mr. Goldberger is admitted to practice by the Supreme Court of the State of California and in all California United States District Courts.

A San Diego native, Mr. Goldberger was a founding member of the Torrey Pines High School "Friends of the Library" and coaches youth sports in his spare time.

JULIE A. KEARNS has been litigating complex class action cases, focusing primarily on violations of federal antitrust and securities laws, since 2006. She also has experience handling civil matters in California state court, and is located in Scott+Scott's San Diego office. Ms. Kearns has been recognized as a Rising Star in the 2015, 2016, 2017, and 2018 editions of Super Lawyers. She was also honored by the San Diego Business Journal as Best of the Bar in 2015.

At Scott+Scott, Ms. Kearns presently devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y) and *Alaska Elec. Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y).

A native Southern Californian, Ms. Kearns earned her Bachelor of Arts degree from the University of California, Santa Barbara, in 2003, with a double major in Political Science and Law & Society. She graduated *cum laude* from Thomas Jefferson School of Law in 2006. During law school, Ms. Kearns served as Executive Board Co-Chair of the Moot Court Society, and participated in multiple competitions across the country. She also served as judicial intern to the Honorable Judge William S. Cannon, who oversaw civil matters in the Superior Court of California, County of San Diego. She completed internships at various public defender entities

at both the state and federal levels, and drafted sponsorship agreements and similar documents as legal intern for the local minor league ice hockey team, the San Diego Gulls.

As an avid animal lover and supporter of animal rights, Ms. Kearns has served as *pro bono* volunteer attorney in association with the non-profit association Expand Animal Rights Now ("EARN") since 2016. She is a long-time supporter of the San Diego Humane Society, the San Diego Zoological Society, the ASPCA, and other similar organizations. Ms. Kearns has also made presentations to middle and high school students around San Diego County as part of the annual, non-partisan Constitution Day event organized by the San Diego ACLU.

Ms. Kearns is licensed to practice law in the state of California, and is admitted to the U.S. District Court for the Southern, Central, and Northern Districts of California, the District of Colorado, and the U.S. Court of Appeals for the Fifth Circuit.

CIAN MANSFIELD is a senior associate in Scott+Scott Europe LLP's London office. He specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal, and the Court of Appeal.

Cian is currently acting as lead associate for a large number of retailers in their claims in the English High Court against Visa and MasterCard in relation to anti-competitive interchange fees; and as lead associate on behalf of a number of potential claimants in follow-on damage actions arising from the Trucks cartel.

Prior to joining Scott+Scott Europe LLP, Cian spent over six years in the London office of Freshfields Bruckhaus Deringer LLP. During his time at Freshfields, Cian worked on a number of competition damages claims arising from European Commission infringement decisions in relation to a number of cartels, including in the energy and industrial sectors. He also acted in a number of investigations, both internal investigations and those brought by international regulators (including the European Commission and the Competition and Markets Authority), and on pieces of general commercial litigation.

Cian also has extensive pro bono experience. He currently acts as an advocate on behalf of failed and pending asylum seekers at the Asylum Support Tribunal as a member of the charity, the Asylum Support Appeals Project. While at Freshfields, Cian worked on UK Supreme Court interventions for the Office of the Children's Commissioner and the Open Society Justice Initiative.

Cian attended University College Dublin, Ireland and graduated in 2007 with a Bachelors of Civil Law (European Legal Studies) (First Class Honours). As part of his degree he spent a year studying at the University of Lausanne in Switzerland. Cian has an LL.M from the University of Cambridge and a Postgraduate Diploma in EU Competition Law from King's College London.

Following his LL.M, Cian completed a five-month *stage* (internship) at the Legal Service of the European Commission in Brussels.

Cian is admitted to practice in England & Wales and the Republic of Ireland.

THOMAS K. BOARDMAN is an associate in the Scott+Scott's New York office, focusing on antitrust litigation. At his prior firm, Mr. Boardman was a member of the trial team in *In re TFT-LCD (Flat Panel) Antitrust Litigation*. For his work on that case, Mr. Boardman was nominated by Consumer Attorneys of California as a finalist for Consumer Attorney of the Year. Mr. Boardman was also an instrumental part of the lead counsel team in *In re Potash Antitrust Litigation (II)*, a case that featured a unanimous victory before an *en banc* panel of the Seventh Circuit, resulting in one of the most influential antitrust appellate opinions in recent memory. The case ended in $90 million in settlements.

At Scott+Scott, Mr. Boardman represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* and represents opt-out plaintiffs in *Mag Instrument Inc v. The Goldman Sachs Group Inc*. Mr. Boardman also represents indirect purchaser plaintiffs in *In re Lithium Ion Batteries Antitrust Litigation*.

Mr. Boardman received his Bachelor of Arts degree from Vassar College in 2004, majoring in Political Science and Film Studies. He received his Juris Doctorate from the University of California, Hastings College of the Law in 2009. While at Hastings, Mr. Boardman was a member of the Hastings Science and Technology Law Journal and worked as a research assistant to professors Geoffrey C. Hazard, Jr. and Rory K. Little. Mr. Boardman is a member of the following Bars: California, New York, Ninth Circuit Court of Appeals, Central District of California, Northern District of California, and Southern District of California. He is also a member of the following professional associations: ABA Antitrust Section – Model Jury Instruction Revision Task Force, ABA Antitrust Section – Young Lawyers Division – Litigation Committee, ABA Antitrust Section – Young Lawyers Division – Civil Practice and Procedure Committee, New York State Bar Association – Antitrust Section, Bar Association of San Francisco, and Public Justice Foundation.

Mr. Boardman has co-authored the following articles: "Reverse Engineering Your Antitrust Case: Plan for Trial Even Before You File Your Case," *Antitrust Magazine*, Spring 2014, Vol. 28, No. 2, with Bruce L. Simon; and "Class Action for Health Professionals," chapter from *Advocacy Strategies for Health and Mental Health Professionals*, Springer Publishing Co., 2011, with Bruce L. Simon, Stuart L. Lustig, Editor.

Prior to joining Scott+Scott, Mr. Boardman worked at Pearson, Simon & Warshaw, LLP in San Francisco and served as a judicial law clerk to the Hon. Christina Reiss in United States District Court, District of Vermont.

Mr. Boardman enjoys running and regularly does so for charity. He has run several races to fundraise for various causes, including the New York City Marathon (National Multiple Sclerosis Foundation) and the Boston Marathon (Cystic Fibrosis Foundation).

PATRICK McGAHAN is an associate in Scott+Scott's London office. He specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal. Mr. McGahan works closely with other members of the firm's Antitrust and Competition Practice in counseling corporate and institutional clients, evaluating potential

claims and developing strategies to recover losses caused by anticompetitive conduct. He has also acted for clients in a variety of arbitrations (both investment treaty and commercial) and pieces of general commercial litigation.

Mr. McGahan is presently representing numerous clients who may have European claims arising from the manipulation of the foreign exchange market. He is also acting for various national and multinational retailers in relation to competition damages claims arising from Visa and MasterCard's card payment schemes.

Prior to joining Scott+Scott, Mr. McGahan spent four years in the London office of Freshfields Bruckhaus Deringer LLP. During this time he acted in many of the leading English competition damages cases, including *National Grid Electricity Transmission Plc v ABB Ltd*. He also acted for numerous clients in competition law investigations, both internal investigations and those brought by the Competition and Markets Authority, the European Commission, and other regulators.

Mr. McGahan attended the University of Queensland and graduated in 2010 with a Bachelor of Laws (First Class Honours) and a Bachelor of Arts (Economics/Political Science). He then spent a year as the Associate to His Honour Justice Andrew Greenwood at the Federal Court of Australia. Mr. McGahan has a Postgraduate Diploma in Competition Law from King's College London.

Mr. McGahan is admitted to practice in England and Wales and in Queensland, Australia.

JAMES HAIN-COLE is located in Scott+Scott's London office. He specialises in competition damages litigation before the English Courts and the Competition Appeal Tribunal. Mr. Hain-Cole works with the firm's Antitrust and Competition Practice in advising international clients on their potential to claim damages arising from anticompetitive conduct and working with them to design an effective strategy to compensate them for losses arising from such conduct. He has also has experience in commercial arbitration and general commercial litigation.

Prior to working with Scott+Scott, Mr. Hain-Cole spent two and a half years at Cuatrecasas in Madrid, where he advised on competition damages claims before the courts of Spain, England and Italy and also formed part of the team that drafted the legal section of the "*Study on the Passing-on of Overcharges*" for the European Commission. Prior to that, Mr. Hain-Cole spent six years in the London office of Freshfields Bruckhaus Deringer LLP, where he advised clients in some of the leading competition damages before the English courts and tribunals, including *Deutsche Bahn AG and others v Morgan Advanced Materials Plc* and *Cooper Tire and Rubber Company Europe Ltd and others v. Dow Deutschland Inc and others*. He also acted for a major financial institution in competition law investigations before the European Commission and other competition regulators worldwide, including in the North America and Asia.

Mr. Hain-Cole attended the University of St. Andrews and graduated in 2006 with a Master of Arts (First Class Honours) in International Relations and Modern History. He then gained the Graduate Diploma in Law and the Legal Practice Course at BPP Law School, London. In 2015,

obtained the BASL DMU Postgraduate Certificate in Sports Law from De Montfort University, Leicester.

Mr. Hain-Cole is admitted to practice in England and Wales. He has professional proficiency in Spanish.

JOHN JASNOCH's practice areas include securities and antitrust class actions, shareholder derivative actions, and other complex litigation. Mr. Jasnoch represented plaintiffs in *In re Washington Mutual Mortgage-Backed Securities Litigation*, Case No. 2:09-cv-00037 (W.D. Washington), a case that was litigated through summary judgment and settled on the eve of trial for $26 million. Mr. Jasnoch was also one of the lead attorneys that secured a $7.68 million settlement in *In re Pacific Biosciences Securities Litigation*, Case No. CIV509210 (San Mateo County, California). Other cases Mr. Jasnoch has worked on that have achieved notable results include: *West Palm Beach Police Pension Fund v. Cardionet, Inc.*, Case No. 37-2010-00086836-CU-SL-CTL (San Diego County, California) ($7.25 million settlement), *Hodges v. Akeena Solar*, 09-cv-2147 (N.D. Cal.) ($4.77 million settlement), *Plymouth County Contributory Ret. Sys. v. Hassan*, No. 08-1022 (D.N.J.) (corporate governance reform), and *In re HQ Sustainable Maritime Industries, Inc., Derivative Litigation*, Case No. 11-2-16742-9 (King County, Washington) ($2.75 million settlement).

As an active member of the Consumer Attorneys of California, Mr. Jasnoch has prepared and submitted successful *amicus curie* briefs to the Ninth Circuit Court of Appeals, including on California's Anti-SLAPP law and consumer protection issues.

Mr. Jasnoch graduated *cum laude* from Creighton University with a Bachelor of Arts in Political Science in 2007. He received his Juris Doctorate from The University of Nebraska College of Law in 2011 and is a member of the California Bar.

MICHAEL G. BURNETT is a graduate of Creighton University (B.A., 1981) and Creighton University School of Law (J.D., 1984). Mr. Burnett practices complex securities litigation at the firm where he consults with the firm's institutional clients on corporate fraud in the securities markets as well as corporate governance issues. In addition to his work with the firm, Mr. Burnett has specialized in intellectual property and related law. Mr. Burnett is admitted to the Nebraska Supreme Court and United States District Court, District of Nebraska. He is a member of the Nebraska Bar Association.

DOUGLAS CAMPBELL is an associate in Scott+Scott's London office who specialises in competition damages litigation. Douglas regularly works with clients and counsel, considering competition and regulatory claims, assessing their merits and viability. He has knowledge of the third-party funding sector and has experience of working on funded cases and preparing proposals for third-party funding.

Douglas is currently representing a number of clients with potential claims against financial institutions for manipulation of the foreign exchange market, and acting for several retailers with claims against Visa and Mastercard in respect of charges and rules imposed in respect of their card payment schemes.

Prior to joining Scott+Scott, Douglas spent five years working for a major UK law firm in Edinburgh and London. During this time he acted in a number of competition damages and general commercial claims in the English High Court and Court of Appeal. His experience includes acting for a Part 20 Defendant airline in the *Air Cargo* follow-on and stand-alone damages claims and acting for a FTSE 250 listed company coordinating a claim against a major UK bank for manipulation of the foreign exchange market. Douglas represented clients across a broad range of industries in the public and private sectors.

Douglas studied law at the University of Edinburgh and spent a year studying law and politics at Université Paul Cézanne Aix-Marseille III in France.

Douglas is admitted to practise in England & Wales and Scotland.

J. ALEX VARGAS serves as Scott+Scott's Director of Investigations. He has devoted over a decade of his career investigating claims on behalf of institutional investors and other stakeholders. At Scott+Scott, Mr. Vargas conducts and oversees investigations across all practice groups. Prior to joining the firm, Mr. Vargas was involved in several high-profile securities fraud cases, including one where he served as the principal investigator in connection with a 14-year litigation, resulting in the largest securities fraud settlement following a trial; a record $1.575 billion recovery in *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.).

Representative antitrust class actions include: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.); *In re SSA Bonds Antitrust Litigation*, No. 1:16-cv-03711-ER (S.D.N.Y.); and *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-cb-27240-CMR (E.D. Pa.).

Representative securities class actions include: *Ret. Bd. of the Policemen's Annuity and Benefit Fund of Chicago v. FXCM Inc.*, No. 1:15-cv-03599-KMW (S.D.N.Y.); *Union Asset Management Holding AG v. SanDisk LLC*, No. 3:15-cv-01455-VC (N.D. Cal.); *In re LendingClub Corp. Shareholder Litig.*, No. CIV537300 (Cal. Super. Ct., San Mateo County) (settlement of $125 million); *In re MobileIron, Inc. S'holder Litig.*, No. 1-15-cv-284001 (Cal. Super. Ct., Santa Clara County) (settlement of $7.5 million); *In re Endochoice Holdings, Inc. Sec. Litig.*, C.A. No. 2016 cv 277772 (Ga. Super. Ct. Fulton County); and *Rubenstein v. Oilsands Quest Inc.*, No. 11-cv-288 (S.D.N.Y.) (settlement of $10.235 million).

Representative consumer and data breach class actions *include In re Pacific Coast Oil Trust Sec. Lit.*, No. BC550418 (Cal. Sup. Ct., Los Angeles County) (settlement of $7.6 million); *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-2228 (N.D. Ill.) (settlement of $5.2 million); *WinSouth Credit Union v. MAPCO Express, Inc.*, No. 14-cv-1573 (M.D. Tenn.) (largest dollar-per-card settlement obtained on behalf of financial institutions involving data breach of credit and debit card information); *Selco Community Credit Union v. Noodles & Co.*, C.A. No. 1:16-cv-2247 (D. Colo.); and *First Choice Fed. Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506 (W.D. Pa.).

Mr. Vargas graduated from the University of San Diego (B.A., 1997) and the University of San Diego School of Law (J.D., 2004). He is admitted to practice in New York, California, and the District of Columbia.

STEPHANIE HACKETT is an associate in Scott+Scott's San Diego office. She primarily practices in the area of antitrust litigation on behalf of classes and individual plaintiffs.

Ms. Hackett has represented class plaintiffs in *Dahl v. Bain Capital Partners, LLC, No. 1:07-cv-12388 (D. Mass.)* ($590.5 million settlement) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-3824 (E.D. Pa.) ($8 million settlement). She represented corporate opt-out clients in *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.).

Ms. Hackett's current cases include representing class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate. Ms. Hackett also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum.

As a part of her *pro bono* work, Ms. Hackett has worked with the San Diego Volunteer Lawyer Program, providing assistance to immigrant victims of domestic violence, and the ABA Immigration Justice Project, where she obtained a grant of asylum on behalf of her client.

Ms. Hackett is an active member of the American Bar Association's Antitrust Section and the San Diego La Raza Lawyers Association. She is also a contributing author to Market+Litigation, Scott+Scott's monthly newsletter.

Ms. Hackett is a graduate of the University of Iowa (B.S. Political Science, International Business Certificate, 2001) and of the University of Iowa College of Law (J.D., with distinction, 2005), where she was a recipient of the Willard L. Boyd Public Service Distinction award. While obtaining her law degree, Ms. Hackett worked as a judicial extern for the Honorable Celeste F. Bremer, United States District Court for the Southern District of Iowa. Ms. Hackett is admitted to practice in California.

In addition to her legal education, Ms. Hackett has engaged in accounting study and passed all four parts of the CPA exam. This background has proved particularly useful in cases involving the financial services industry.

HAL CUNNINGHAM is a graduate of Murray State (B.S. Biological Chemistry) and the University of San Diego School of Law. Prior to joining Scott+Scott, Mr. Cunningham was engaged in research and development in the chemical and pharmaceutical industries.

Mr. Cunningham's practice focuses on securities class action, shareholder derivative, and consumer litigation. While at Scott+Scott, Mr. Cunningham has worked on several cases that

have achieved notable results, including *In re Washington Mutual Mortgage Backed Securities Litigation*, No. C09-0037 (W.D. Wash.) (securities settlement of $26 million). Mr. Cunningham is also involved in the Firm's securities lead plaintiff motion practice, having briefed several successful lead plaintiff applications for the firm's institutional and individual clients.

Mr. Cunningham is a regular contributor to and editor of Scott+Scott's monthly newsletter, MARKET+LITIGATION.

Mr. Cunningham is admitted to practice in California.

S. SINAI MEGIBOW is an Investigator in Scott+Scott's Investigations Department. He has extensive experience conducting a wide range of investigations, including securities fraud, internal investigations, antitrust matters, Foreign Corrupt Practices Act compliance, corporate due diligence, and litigation intelligence. Prior to joining Scott+Scott, Sinai served as a Director in a global private investigation and intelligence consulting firm. Sinai began his career as an associate attorney practicing in the areas of White Collar Criminal matters and commercial litigation.

Mr. Megibow graduated from Tulane University (B.A., 1995), University of Chicago (M.A., 1998) and UCLA School of Law (J.D., 2001). He is admitted to practice in New York. He is also a Certified Fraud Examiner and a licensed private investigator in New York and Florida.

YIFAN ("KATE") LV is an associate in Scott+Scott's San Diego office. Her practice focuses on prosecuting antitrust actions with an emphasis on intercultural cartels.

Ms. Lv represents plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y), challenging foreign-exchange market manipulation by many global financial institutions. Ms. Lv also represents and advises the Firm's Asian clients.

Ms. Lv graduated from Tianjin University of Commerce, Tianjin, China, with a Dual Bachelors in Law and Economics in 2008, from Peoples University of China, Beijing, China with a Master in Law in June 2010, and from William & Mary School of Law in 2014.

Ms. Lv is bilingual, speaking fluent Chinese and English.

Ms. Lv is a member of the California, New York, and China Bars.

MICHELLE CONSTON is an associate at Scott+Scott's New York office, focusing on antitrust litigation.

Prior to joining Scott+Scott, Ms. Conston represented institutional investors, hedge funds, and individual investors in complex class action litigation arising under the Commodity Exchange Act, Sherman Act, RICO Act, and common law. She was heavily involved in litigating actions alleging the manipulation of the London Interbank Offered Rate ("LIBOR") for several currencies by large financial institutions (*e.g.*, *Laydon v. Mizuho Bank, Ltd.*, No. 12-cv-3419 (S.D.N.Y.) and *Sullivan v. Barclays plc*, No. 13-cv-00281 (S.D.N.Y.)), as well as an action

alleging manipulation of the daily London Silver Fixing by the Fixing Banks and several other financial institutions (*In re London Silver Fixing, Ltd., Antitrust Litigation*, No. 14-md-02573 (S.D.N.Y.)).

At Scott+Scott, Ms. Conston presently devotes much of her time representing investors in cases involving the manipulation of financial benchmarks by numerous major banks, including *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y) and *Alaska Elec. Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y).

Ms. Conston is a graduate of Marist College (B.A., *magna cum laude*, 2010) and the University of Miami School of Law (J.D., *magna cum laude*, 2013). During law school, Ms. Conston served as a judicial intern for the Honorable Stephen T. Brown, the Chief Magistrate Judge of the United States District Court for the Southern District of Florida. Ms. Conston also served as a certified legal intern for the United States Attorney's Office for the Southern District of Florida.

Ms. Conston is licensed to practice law in New York, New Jersey, and Florida, and is admitted to the U.S. District Court for the Southern District of New York.

SCOTT JACOBSEN is an associate in Scott+Scott's New York office. Mr. Jacobsen practices in the areas of shareholder derivative actions, securities class action litigation, and other complex litigation.

While at Scott+Scott, Mr. Jacobsen has primarily focused on securities and derivative litigation, including investigation of corporate books and records to evaluate potential claims on behalf of shareholders. Cases include *International Union of Operating Engineers Local No. 478 Pension Fund v. McInerney*, C.A. No. 11901-VCN (Del. Ch. Jan 13, 2016) (derivatively on behalf of Genworth Financial Inc.); *Carlson v. Dipp*, No. 1:15-cv-14032 (D. Mass. Dec. 7, 2015) (securities class action); *Fernicola v. Hugin*, C.A. No. 11748-VCMR (Del. Ch. Nov. 24, 2015) (derivatively on behalf of Celgene Corp.); *Feldman v. Kulas*, C.A. No. 11614-VCG (Del. Ch. Oct. 15, 2015) (derivatively on behalf of Santander Consumer USA Holdings Inc.); *Fortunato v. Akebia Therapeutics, Inc.*, No. 1:15-cv-13501 (D. Mass. Oct. 5, 2015) (securities class action).
Mr. Jacobsen graduated from The George Washington University (B.A. English, *magna cum laude*; M.A., English) and William & Mary Law School (J.D. 2014). During law school, Mr. Jacobsen externed at the American Civil Liberties Union of Virginia and served as a staff member for the William & Mary Bill of Rights Journal.

Mr. Jacobsen is a member of the following professional associations: ABA Business Section and ABA Young Lawyers Division. Mr. Jacobsen is also a regular contributor to Scott+Scott's monthly newsletter. He is admitted to practice in New Jersey, New York, and the United States District Court for the Southern District of New York.

RHIANA SWARTZ is an associate in the firm's New York office. Ms. Swartz graduated *magna cum laude* from Brooklyn Law School in 2006, and received her B.A. from Swarthmore College in 2000. After graduating from law school, Ms. Swartz clerked for the Honorable Joan M. Azrack in the Eastern District of New York.

Ms. Swartz's practice focuses on securities class actions and shareholder derivative actions.

Prior to joining Scott+Scott, Ms. Swartz was Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, Office of Corporation Counsel, where she handled federal cases brought under 42 U.S.C. §1983 from initial receipt of complaint through trial verdict. Ms. Swartz settled more than 80 cases and conducted four federal trials. Ms. Swartz also spent more than four years as an Associate at Sullivan & Cromwell LLP in New York, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and employment law issues.

Ms. Swartz is a member of the New York bar and is admitted to practice in the Southern District of New York, Eastern District of New York, and Second Circuit.

SEAN T. MASSON is an associate in Scott+Scott's New York office. Mr. Masson's practice focuses on securities class action, mass torts, and other complex commercial litigation. *Super Lawyers* has named Mr. Masson a Rising Star for four consecutive years (2015-2018) for his work as a securities class action litigator.

Prior to entering the private sector, Mr. Masson served as an Assistant District, successfully argued over 40 appeals in state and federal courts and gained extensive experience with large-scale government and regulatory investigations. Notable cases include: *People v. McKelvey* (upheld 75-year sentence for serial rapist preying on homeless women); *People v. Doyle* (affirming conviction for notorious fine art thief); and *People v. Wong* (affirming conviction of driving school instructor involved in hit and run of a child).

Mr. Masson graduated from Queens College (*summa cum laude*) and Hofstra University School of Law (*cum laude*). During law school, Mr. Masson served as the Senior Notes and Comments Editor of the *Hofstra Law Review* and won various awards during Moot Court competitions.

Mr. Masson's publications include:

The Presidential Right of Publicity, 2010 Boston College Intellectual Property & Technology Forum 012001.

Note, *Cracking Open the Golden Door: Revisiting U.S. Asylum Law's Response To China's One-Child Policy*, 37 Hofstra Law Review 1135 (2009).

MARGARET (MAGGIE) FERRON is an associate at the Firm's Connecticut office. Ms. Ferron is a graduate of Middlebury College (B.A., 2003) and the University of Connecticut School of Law (J.D., High Honors, 2009). During law school, Ms. Ferron worked for the Honorable Janet Bond Arterton of the U.S. District Court for the District of Connecticut and for the Iran Human Rights Documentation Center in New Haven, Connecticut. As an undergraduate, she studied classical languages and history in Athens, Greece; as a law student, she studied international human rights law at Trinity College, Dublin, Ireland.

Prior to joining the firm, Ms. Ferron worked as a plaintiffs' employment lawyer in Hartford for several years. Her experience also encompasses municipal affairs and state grant compliance. Ms. Ferron practices in varied Connecticut state court matters as well as federal class actions. She is admitted to practice in Connecticut and the U.S. District Court for the District of Connecticut.

Ms. Ferron is a trustee of Joshua's Tract Conservation and Historic Trust, located in Mansfield, Connecticut. She successfully led an effort to build an accessible playground in Mansfield and enjoys trail running and reading with her family.

LAUREN S. MCCABE is an associate in Scott+Scott's New York office. Ms. McCabe's practice focuses on securities class actions.

Prior to joining Scott+Scott, Ms. McCabe practiced complex commercial litigation for ten years at the New York office of Gibson Dunn & Crutcher LLP.

Ms. McCabe graduated from Pepperdine University (*summa cum laude*) and New York University School of Law, where she was a McKay Scholar.

Ms. McCabe's publications include:

"*Justice Holland's Lasting Imprint on Corporate Law*," Delaware Business Court Insider (March 14, 2017).

JING-LI YU is an associate in the New York office where he focuses on shareholder derivative and federal securities litigation.

Mr. Yu is a graduate of the University of Pennsylvania (B.A., Economics, *cum laude*, 2001), University of Chicago (M.A., Social Sciences, 2005), and the University of Chicago Law School (J.D., 2010).

Prior to joining Scott+Scott, Mr. Yu was a litigation associate based in Wilmington, Delaware at a litigation boutique that primarily represented institutional plaintiffs, and before then, he was a litigation and investigations associate based in New York, New York at two international law firms that primarily represented institutional defendants.

Mr. Yu is admitted to practice before the States of Delaware and New York. He is also admitted to the United States District Courts for the Eastern District of New York and Southern District of New York, as well as the United States Court of Appeals for the Second Circuit.

CAREY ALEXANDER is an associate in Scott+Scott's New York office where he focuses on complex consumer litigation and class actions.

Mr. Alexander received his B.A. from Skidmore College in 2004, and graduated *magna cum laude* from St. John's University School of Law in 2012. During law school, Mr. Alexander served as Associate Managing Editor of the *St. John's Law Review*. His student note, *Abusive:*

Dodd–Frank Section 1031 and the Continuing Struggle To Protect Consumers, 85 St. John's L. Rev. 1105 (2012), has been cited in several legal journals, including the *Harvard Law Review*.

Prior to law school, Mr. Alexander served as an editor of the consumer-advocacy blog, *Consumerist.com*. He also served as an advisor to the Bronx Borough President and worked as part of the National Campaign to Restore Civil Rights.

Mr. Alexander is admitted to practice in the State of New York and in several federal courts, including New York's Southern, Eastern, and Western Districts, the Northern District of Illinois, and Court of Appeals for the Ninth Circuit.

ANJALI BHAT is an associate at the Firm's New York office. Ms. Bhat is a graduate of Swarthmore College (B.A., High Honors, 2007) and Columbia Law School (J.D., High Honors, 2011). During law school, Ms. Bhat was a Harlan Fiske Stone Scholar and a finalist in the Harlan Fiske Stone Moot Court Competition. As an undergraduate, she studied history.

Prior to joining the firm, Ms. Bhat clerked for the Honorable William F. Kuntz II of the United States District Court for the Eastern District of New York. In addition to securities class actions, her experience also encompasses real estate litigation in New York state courts. She is admitted to practice in New York and the U.S. District Courts for the Southern and Eastern Districts of New York. She enjoys reading, tennis, and rock climbing.

JOSEPH G. CLEEMANN is an associate at the Firm's New York Office. He represents dozens of governmental entities in seven states who are prosecuting pharmaceutical manufacturers and distributors in opioid litigation.

Prior to coming to the Firm, Joe worked eight years at Ropes & Gray, LLP, where he principally represented corporate defendants in government prosecutions, class actions, and complex business litigation. He has extensive experience in the area of data privacy.

Joe is a graduate of Brooklyn Law School, from which he graduated *cum laude* in 2009. He spent his first year out of law school at a Ropes-sponsored fellowship with the Legal Aid Society's Prisoners' Rights Project. During law school, he interned with the Hon. Robert Sack in the Second Circuit and the Hon. Shira A. Scheindlin in the Southern District of New York.

Joe has additional degrees from Columbia University (M.S., Journalism, 2004) and Harvard University (A.B., History, 1998). Prior to entering the law, he worked seven years in trade book publishing.

RANDY MOONAN is an associate in the firm's New York office. Mr. Moonan's practice focuses on securities class actions.

Prior to joining Scott+Scott, Mr. Moonan was a litigation associate at Simpson Thacher & Bartlett LLP, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and insurance law issues.

Mr. Moonan is a graduate of the University at Albany (B.A., History and Political Science, *magna cum laude*, Phi Beta Kappa, 2010) and Cornell Law School (J.D. 2013). During law school, Mr. Moonan served as a Managing Editor of the Cornell Journal of Law and Public Policy.

Mr. Moonan is admitted to practice in New York and the United States District Court for the Southern and Eastern Districts of New York.

KASSANDRA NELSON is an associate in the firm's New York office where she focuses on securities and antitrust litigation.

Ms. Nelson is a graduate of the University of Alabama (B.A., *cum laude* 2012) and Southern Methodist University (J.D., 2016). During law school, Ms. Nelson volunteered over 450+ hours in Legal Public Service and received the distinction of Pro Bono Honor Roll upon graduation. She worked as an intern for the Domestic Violence Division at the Dallas County District Attorney's Office as well as an extern for the Honorable Judge Martin Hoffman. Ms. Nelson served as a student attorney for SMU's Innocence Clinic, working with the Dallas County Public Defender's Office and New York Innocence Project, and successfully advocated for the release and exoneration of Steven Chaney, freed after wrongfully serving more than 25 years.

Ms. Nelson is admitted to practice in the State of Texas.

JONATHAN ZIMMERMAN is an associate in the New York office where he focuses on shareholder derivative and federal securities litigation.

Mr. Zimmerman is a graduate of McGill University, Desautels School of Management (B.Commerce, 2009) and Temple University, Beasley School of Jaw (J.D., 2016). While in law school, Mr. Zimmerman served as a Staff Editor on Temple's International and Comparative Law Journal. He also received the Best Paper Award in Advanced Financial Regulations for his work entitled *Corporate Diversions*: *Short-Term Tax Savings at the Expense of Shareholder Rights* (Spring 2015).

Prior to joining Scott+Scott, Mr. Zimmerman practiced in the areas of shareholder derivative, federal securities, and *Qui Tam* litigation as an Associate at The Weiser Law Firm, located in the suburbs of Philadelphia, Pennsylvania.

Mr. Zimmerman is a member of the New Jersey and Pennsylvania Bars. He is also a admitted to the U.S. District Court for the District of New Jersey and the U.S. District Court for the Eastern District of Pennsylvania.

A former two-time All-Canadian collegiate lacrosse player and co-captain of McGill University's men's varsity team, Mr. Zimmerman loves watching and playing sports when he, his wife, and his son are not exploring New York City's vibrant food scene.

PHILIPPA (PIPPA) WINSTANLEY is an associate in Scott+Scott Europe LLP's London office. She specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal.

Pippa is currently representing potential claimants in follow-on damage actions against Visa and MasterCard in relation to anti-competitive interchange fees. She is also acting on behalf of clients seeking compensation from participants in a long-running multinational cartel. Pippa also works on general commercial litigation, including a dispute relating to a major property portfolio in the UK.

Prior to joining Scott+Scott Europe LLP, Pippa trained at Marriott Harrison LLP and qualified in commercial litigation at Clyde & Co LLP, where she represented major energy and aviation clients in relation to various debt recovery and breach of contract claims. Pippa has experience representing both corporations and individual shareholders.

Pippa attended the University of Oxford and graduated in 2012 with a Bachelor of Music. Pippa subsequently undertook a Graduate Diploma of Law and LLM in Law at the University of Law, London.

Pippa is admitted to practice in England and Wales.

RUTH MANSON is an associate in Scott+Scott Europe LLP's London office.

Ruth specialises in commercial and competition litigation. She is currently working as part of the firm's Antitrust and Competition Practice advising a number of retailers regarding claims against Visa and MasterCard in respect of anti-competitive interchange fees, and working with numerous clients assessing potential claims arising from the manipulation of the foreign exchange market.

Prior to joining Scott+Scott Europe LLP, Ruth completed her traineeship at a major UK law firm in London. During her traineeship, Ruth worked on a number of large scale litigations including a multi-million pound breach of contract claim and acting on behalf of a Part 20 Defendant in the on-going Air Cargo cartel litigation.

Ruth attend the University of Cambridge (Trinity Hall) and graduated in 2015 with a Bachelor of Arts in Law. She subsequently completed her Legal Practice Course, which she passed with distinction, at the University of Westminster.

Ruth is admitted to practice in England and Wales.

JEFFREY P. JACOBSON is an associate in the New York office where he focuses on federal securities litigation.

Jeff is a graduate of the George Washington University Law School (J.D., High Honors, Order of the Coif, 2017) and George Washington University (B.A., Journalism & Political Science, *summa cum laude*, Distinguished Scholar, 2013).

Prior to joining Scott+Scott, Jeff was a litigation associate at a major international law firm where he represented clients in securities cases, bankruptcy proceedings, and antitrust matters, and advised clients on employment matters.

Jeff is admitted to practice in the State of New York.

JUSTIN W. BATTEN is an associate in the firm's New York office. Mr. Batten's practice focuses on complex and class action litigation with an emphasis on antitrust and consumer protection matters. Prior to joining Scott+Scott, Mr. Batten served as an Assistant Attorney General in the New York Attorney General's Antitrust Bureau.

Mr. Batten is an active member of the New York State Bar Association's Antitrust Section. He serves as the Young Lawyer Liaison to the Antitrust Section's Executive Committee, and is a member of the Donnelly Act Revision Committee.

Mr. Batten is a graduate of New York University School of Law (J.D., 2017) and Georgia State University (B.A. Spanish, *cum laude*, 2012). While at NYU, Mr. Batten served as an intern with the Georgia Attorney General's Office and Texas RioGrande Legal Aid, assisted clients in a clinic with employment law matters, and was a Teaching Assistant to Professor Mark Geistfeld for a first-year torts course. Mr. Batten also served as an articles editor for NYU's *Journal of Law & Liberty*.

Mr. Batten is admitted to practice in New York.

G. DUSTIN FOSTER's main practice areas include antitrust, securities, and complex litigation, which includes such cases as *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *Dahl v. Bain Capital Partners, LLC*, No. 1:07-cv-12388 (D. Mass.), and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 2:12-cv-03824 (E.D. Pa.). Mr. Foster is a member of the West Virginia State Bar.

Mr. Foster is a graduate of West Virginia Wesleyan College (B.S., Biology, *cum laude*, 1999) and of the West Virginia University College of Law (J.D., 2002), where he earned a position on the Moot Court Board and Lugar Trial Association. During law school, Mr. Foster served as a law clerk for the West Virginia Supreme Court of Appeals, after which he assumed a full-time term position as a law clerk for the Hon. Thomas C. Evans, III, of the Fifth Circuit Court of West Virginia.

JOSEPH A. PETTIGREW's practice areas include securities, antitrust, shareholder derivative litigation, and other complex litigation, including work on the following cases: *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.); *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y); and *Marvin H. Maurras Revocable Trust v. Bronfman*, 12-cv-3395 (N.D. Ill.).

Mr. Pettigrew graduated from Carleton College (B.A., Art History, *cum laude*, 1998) and from the University of San Diego School of Law (J.D., 2004). Mr. Pettigrew has served on the board and as legal counsel to several nonprofit arts organizations.

Mr. Pettigrew is admitted to practice in California and Maryland.

JACEY BOGLER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Jacey graduated, *cum laude*, from Iowa State University with a Bachelor of Arts degree in Psychology and Criminal Justice (minor) in 2010. She graduated with *honors* from Drake University Law School in 2014. While at Drake, Jacey was a junior staff and editorial board member of the Drake Law Review.

Jacey is admitted to practice in the State of Iowa.

JOEL BOORAS is a staff attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Mr. Booras received his B.A. from the University of San Diego in 2008, and graduated from the University of San Diego School of Law in 2012.

Prior to joining Scott+Scott, Mr. Booras practiced in the personal injury field and managed cases in the electronic discovery arena for several high-profile technology clients.

Mr. Booras is admitted to practice in the State of California.

VICTORIA BURKE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Victoria received her B.A. from Arizona State University in 1997, and graduated from Southwestern Law School in 2011. Additionally, in 2014, Victoria attained a certificate of completion from Loyola Law School's Fashion Law Summer Intensive program.

On behalf of the American Bar Association, Victoria serves as Vice-Chair of the Trademark Transactions Committee, Chair of the Fashion Law Subcommittee, and former Vice-Chair of the Trademark Litigation Committee. She also frequently authors law articles on a range of topics for various legal publications, most recently for the Daily Journal in November 2016, "*Blunt Talk About Trademarks in the Marijuana Business*." Victoria has also served as panelist for many programs, such as the ABA's webinar *Runway Ready: Fashion Law Fundamentals* (2016). Victoria has volunteered her time to Bet Tzedek's *Employment Rights Project: Wages and Hour* cases and regularly serves as a moot court judge for Pepperdine University School of Law's Annual National Entertainment Law Moot Court Competition.

Victoria is admitted to practice in the State of California and the District of Columbia, and in several federal courts, including the U.S. District Court for the Central District of California.

ELIZABETH A. CAMPOS is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Campos received her B.A. from the University of Southern California in 1997, and graduated from Thomas Jefferson School of Law in 2001.

Ms. Campos is admitted to practice in the State of California and is registered to practice in front of the U.S. Patent and Trademark Office.

NGA CUNNINGHAM is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Nga received her B.A. from the University of California, San Diego in Political Science with an emphasis on Public Policy, and graduated, *cum laude*, from Thomas Jefferson School of Law in 2005.

Nga is admitted to practice in the State of California and in the U.S. District Court for the Central District of California.

YVONNE FUNK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Yvonne received her B.A. from UCLA in 2001, and graduated from UC Hastings law school in 2007. She is admitted to practice in the State of California.

CARLY HENEK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Carly received her B.S. from State University of New York at Albany in Human Biology, and graduated from St. John's School of Law in 2001.

Carly has extensive state and federal court experience litigating against and representing major U.S. and international corporations and individual clients in all phases of the litigation process. Her practice focuses on complex commercial litigation and securities fraud litigation.

Carly is admitted to practice in the State of California and New York, including all federal courts in California and New York.

TODD S. HIPPER is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Todd received his B.A. in Political Science from University of California, Berkeley in 1996, and graduated from Georgetown University Law Center in 2001.

Todd is admitted to practice in the States of California and New York, and in several federal courts, including all federal courts in California, and the U.S. District Court for the Eastern District of New York.

RANDALL AUBREY PETRIE is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Randall received his B.A. from Hamilton College in 1988, and graduated from George Washington University School of Law in 1992, Dean's Fellow.

Randall is admitted to practice in the States of New York and New Jersey and in U.S. District Court for the Southern District of New York.

MELANIE PORTER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Melanie graduated from UCLA with a B.A. in Psychology in 2003. She received her J.D. from California Western School of Law in 2006, where she graduated *cum laude* in her concentration. While at CWSL, Melanie served as President of the Asian Pacific Law Student Association and Hawaiian Law Student Association, as well as Secretary and Chair of Community Relations for the Health Law Society and Co-Chair of the Social and Membership Committee for Phi Alpha Delta.

In 2016 and 2017, Melanie received the Rising Star recognition by Super Lawyers. She is currently a member of the California State Bar, San Diego County Bar Association, Consumer Attorneys of San Diego, and the American Bar Association.

She is admitted to practice in the State of California and the U.S. Southern District of California.

SEAN RUSSELL is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Mr. Russell graduated in 2008 from the University of California, Davis with a Bachelor of Arts in Economics. He received his Juris Doctorate from Thomas Jefferson School of Law in 2015, *cum laude*, where he was Chief Articles Editor of the Thomas Jefferson Law Review and a Moot Court Competitor. While at Thomas Jefferson, Mr. Russell also served as an extern to the Honorable William V. Gallo of the U.S. District Court for the Southern District of California. Mr. Russell received a Masters of Taxation from the University of San Diego School of Law in 2016.

Mr. Russell is admitted to practice in the State of California and the U.S. District Court for the Southern District of California.

AMY SIPE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Sipe received her B.A. and M.A. from the University of Missouri in Communications, and graduated from the University of Missouri School of Law in Kansas City.

Prior to joining Scott+Scott, Ms. Sipe worked as in-house counsel for a highly diversified Fortune 500 corporation and for an Am Law Top 20 Litigation Firm. Most recently, in addition to antitrust litigation and class actions, Ms. Sipe has focused on best practices in the areas of electronic discovery, information governance, compliance, and risk management.

Ms. Sipe is admitted to practice in the State of Kansas and in the U.S. Court of Appeals for the 10th Circuit.

BRANDON ZAPF is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Brandon received his B.A. from the University of California, Santa Barbara, in 2002, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007. He received his LL.M. in taxation from the University of San Diego School of Law in 2011.

Brandon is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central District of California.

CAITLIN ZAPF is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Caitlin received her B.A. from the University of California, San Diego in 2003, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007.

Caitlin is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central, Eastern, and Northern Districts of California.

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT

REPORTED HOURS AND LODESTAR AT CURRENT HOURLY RATES

Scott+Scott Attorneys at Law LLP

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Christopher Burke (P)											2.20	0.80			3.00	$995.00	$2,985.00
John Jasnoch (P)										0.50	1.60	8.20			10.30	$600.00	$6,180.00
Dustin Foster (OC)									1.50	1.00	1.20	0.70			4.40	$425.00	$1,870.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.50	1.50	5.00	9.70	0.00	0.00	17.70		$11,035.00
NON-ATTORNEYS																	
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.50**	**1.50**	**5.00**	**9.70**	**0.00**	**0.00**	**17.70**		**$11,035.00**

EXHIBIT C

EXHIBIT C

IN RE: LITHIUM ION BATTERIES INDIRECT

Detailed Reported Hours and Lodestar at Historic Hourly Rates

Scott+Scott Attorneys at Law LLP | **Reporting Period: March 1, 2017 through April 1, 2018**

Date	*Entry #*	*Matter*	*Lwyr*	*Hours*	*Rate*	*Amount*	*Explanation*
4/12/2017	1871670	12104	John Jasnoch	0.50	$ 575.00	$ 287.50	Review of class certification decision for email update to [redacted]
4/18/2017	1872015	12104	Dustin Foster	1.00	$ 400.00	$ 400.00	Reading opinion denying class certification and correspondence with co-counsel regarding [redacted] to prepare for teleconference with client regarding [redacted]
4/24/2017	2000352	12104	Christopher Burke	1.00	$ 900.00	$ 900.00	Conference call regarding [redacted]
6/23/2017	2010938	12104	Christopher Burke	1.00	$ 950.00	$ 950.00	Update with John Jasnoch regarding [redacted]
2/14/2018	2042351	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email update to W. Noss and Daryl Scott regarding [redacted].
2/19/2018	2042365	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Email correspondence with Plaintiff Donna Shawn regarding [redacted]
5/7/2018	2079756	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Confer with G. Foster to update plaintiff Linda Lincoln on the [redacted].
6/25/2018	2103285	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference with J. Jasnoch re [redacted] and [redacted]
6/27/2018	2091884	12104	Dustin Foster	0.50	$ 425.00	$ 212.50	Call with client regarding [redacted]; correspondence with co-counsel regarding [redacted]
7/23/2018	2100497	12104	Christopher Burke	0.40	$ 995.00	$ 398.00	Conference with leads re [redacted]; conference with J. Jasnoch
7/23/2018	2107222	12104	John Jasnoch	1.50	$ 600.00	$ 900.00	Confer with C. Burke regarding [redacted].
7/24/2018	2107226	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Confer with Client Donna Shawn about [redacted]; email correspondence with co-lead firms regarding [redacted]
7/24/2018	2107227	12104	John Jasnoch	0.60	$ 600.00	$ 360.00	Confer with G. Foster regarding [redacted].
7/26/2018	2104665	12104	Dustin Foster	1.00	$ 425.00	$ 425.00	Correspondence and call with client regarding [redacted]; reading [redacted] and preparing for meeting with client to discuss [redacted]

Date	*Entry #*	*Matter*	*Lwyr*	*Hours*	*Rate*	*Amount*	*Explanation*
7/26/2018	2104665	12104	Dustin Foster	1.80	$ 425.00	$ 765.00	traveling to and meeting with client regarding [redacted] and discussing correspondence with co-counsel regarding [redacted]
11/7/2018	2159002	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with Tamarah Prevost regarding [redacted].
11/7/2018	2159003	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Conferral with D. Foster on [redacted].
11/12/2018	2159020	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Email correspondence with D. Foster regarding settlement with Panasonic Sanyo defendant.
11/12/2018	2159021	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Update to C. Burke, W. Noss, and Daryl Scott regarding [redacted].
11/16/2018	2161896	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference with leads and J. Jasnoch re [redacted]
11/16/2018	2159033	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Review of letter from co-lead counsel regarding [redacted] confer with D. Foster regarding [redacted].
11/16/2018	2159034	12104	John Jasnoch	0.40	$ 600.00	$ 240.00	Email correspondence to class rep Donna Shawn regarding [redacted]; email to C. Burke regarding [redacted]
11/19/2018	2161954	12104	Christopher Burke	0.20	$ 995.00	$ 199.00	Conference re [redacted]
11/19/2018	2157767	12104	Dustin Foster	0.10	$ 425.00	$ 42.50	Correspondence with lead counsel regarding mee [redacted]
11/19/2018	2159035	12104	John Jasnoch	1.00	$ 600.00	$ 600.00	Teleconference with Donna Shawn regarding [redacted]
11/19/2018	2159036	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with co-lead counsel Brian Miller advising of [redacted].
11/26/2018	2159038	12104	John Jasnoch	0.20	$ 600.00	$ 120.00	Email correspondence with class rep Donna Shawn on [redacted].
12/21/2018	2169853	12104	John Jasnoch	0.50	$ 600.00	$ 300.00	Review of status report re settlements; update to C. Burke re [redacted].
				17.70		$ 10,857.50	

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
SCOTT+SCOTT ATTORNEYS AT LAW LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$ 50,000.00
Court Fees (Filing, etc.)	700.00
Federal Express	477.21
Hearing Transcripts	5,949.90
Lexis/Westlaw	686.89
Photocopies – In House (capped at $0.20 per copy)	2,242.60
Postage	27.78
Telephone/Telecopier	19.02
Travel	7,001.29
TOTAL:	$ 67,104.69

EXHIBIT 59

Daryl F. Scott
SCOTT+SCOTT, ATTORNEYS AT LAW, LLP
156 South Main Street
P.O. Box 192
Colchester, CT 06415
Telephone: 860-537-5537
Facsimile: 860-537-4432
daryl.scott@scott-scott.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 4:13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF DARYL F. SCOTT IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**

I, Daryl F. Scott declare:

1. I am a partner of Scott+Scott, Attorneys at Law, LLP ("Scott+Scott"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm is a member of Plaintiffs' executive committee and has served as counsel to Class representatives Linda Lincoln and Donna Shawn, and as counsel for IPPs throughout the course of this litigation. My firm was counsel to certain other proposed Class representatives, including Benjamin Kramer, Angela Turner, and Matthew Miller, who were dropped as named Plaintiffs when the IPP Class definition was narrowed to only include claims based on purchases of cylindrical lithium batteries.

3. The background and experience of Scott+Scott and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

5. During the pendency of the litigation, Scott+Scott performed the following work: (i) conferring with Class representatives and keeping them apprised of the status of the litigation; (ii) working with several Class representatives in responding to requests for production of documents and interrogatories; (iii) working with Class representatives to collect and produce responsive discovery documents to Defendants; (iv) preparing for and defending multiple Class representative depositions; (v) conferring with Class representatives regarding the proposed settlements; (vi) researching and drafting an opposition to one of the Defendants' motions to

dismiss; (vii) reviewing documents produced by Defendants; and (viii) performing other tasks at the direction of the co-lead counsel firms.

6. Attached hereto as **Exhibit B** is a billing summary of Scott+Scott's total hours and lodestar, computed at current billing rates, from June 1, 2013, to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Scott+Scott during this period of time was 1854.80, with a corresponding lodestar (based on current rates) of $779,655. The lodestar amount reflected in **Exhibit B** is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Scott+Scott.

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

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

9. Attached hereto as **Exhibit E** is a summary of the expenses Scott+Scott has incurred during the course of this litigation. Scott+Scott expended a total of $67,679.53 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Scott+Scott on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

10. I have reviewed the time and expenses reported by Scott+Scott in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on Tuesday, May 23, 2017 at Colchester, Connecticut.

Daryl F. Scott

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

MISSION STATEMENT

Scott+Scott, Attorneys at Law, LLP ("Scott+Scott") is a nationally recognized law firm headquartered in Connecticut with offices in California, New York City, and Ohio. Scott+Scott represents individuals, businesses, public and private pension funds, and others who have suffered from corporate fraud and wrongdoing. Scott+Scott is directly responsible for recovering hundreds of millions of dollars and achieving substantial corporate governance reforms on behalf of its clients. Scott+Scott has significant expertise in complex antitrust, consumer, securities, ERISA, and civil rights litigation in both federal and state courts. Through its efforts, Scott+Scott promotes corporate social responsibility.

ANTITRUST

Scott+Scott litigates complex antitrust cases throughout the United States. Scott+Scott represents investors, business, and consumers in price-fixing, bid-rigging, monopolization, and other restraints of trade cases on both a class-wide and individual basis, helping to ensure that markets remain free, open, and competitive. With the opening of a London Office, Scott+Scott's commitment to competition now includes pursuing its clients' claims on a global basis.

Scott+Scott's class action antitrust practice includes serving as court-appointed lead counsel with the responsibility for the prosecution of class claims. Scott+Scott serves as court-appointed lead counsel in high-value antitrust class action cases, including *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) (challenging bid rigging and market allocation of leveraged buyouts by private equity firms resulting in $590.5 million in settlements)); *In Re: Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.) (challenging price-fixing of foreign exchange rates (over $2 billion in partial settlements negotiated)); and *Alaska Electrical Pension Fund v. Bank of America Corp.*, No. 14-cv-7126 (S.D.N.Y.) (challenging price-fixing of the ISDAfix benchmark interest rate). Scott+Scott has served as court-appointed lead counsel in other cases, including *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891, No. CV 07-06542 (C.D. Cal.) (challenging price-fixing/illegal surcharge ($86 million in cash and travel voucher settlements) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 12-cv-03824 (E.D. Pa.) (challenging monopolization in the sale of name-brand pharmaceutical ($8 million settlement)).

When not serving as lead counsel, Scott+Scott has served on the executive leadership committees in numerous class action cases. Representative actions include *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, No. 1:05-md-1720 (E.D.N.Y.) (challenging price-fixing in the payment cards industry ($7.25 billion settlement)); *Kleen*

Products LLC v. Packaging Corporation of America, No. 1:10-cv-05711 (N.D. Ill.) (challenging price-fixing of containerboard products); and *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420-YGR (DMR) (N.D. Cal.) (challenging price-fixing of lithium-ion batteries).

Scott+Scott's class action antitrust experience includes serving as co-trial counsel in *In re Scrap Metal Antitrust Litigation*, 02-cv-0844-KMO (N.D. Ohio), where it helped obtain a $34.5 million jury verdict, which was subsequently affirmed by the United States Court of Appeals for the Sixth Circuit (*see In re Scrap Metal Antitrust Litigation*, 527 F.3d 517, 524 (6th Cir. 2008)), and in the consolidated bench trial in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.), and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Scott+Scott also represents large clients in opt-out antitrust litigation. Scott+Scott currently represents Eastman Kodak Company, Agfa Corporation, Agfa Graphics, N.V., and Mag Instrument, Inc. in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.). Scott+Scott previously represented publicly traded corporations, such as Parker Hannifin Corporation and PolyOne Corporation, in matters such as *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastic Additives Antitrust Litigation (No. II)*, MDL No. 1684 (E.D. Pa.).

CONSUMER RIGHTS

Scott+Scott and its attorneys have a proven track record of obtaining significant recoveries for consumers in class action cases. Scott+Scott is one of the premier advocates in the area of consumer protection law and has been appointed to a number of prominent leadership positions.

Cases where Scott+Scott has played a leading role in the area of consumer protection litigation include:

- *In re Providian Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) ($105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);
- *The Vulcan Society, Inc. v. The City of New York*, No. 07-cv-02067 (E.D.N.Y.) ($100 million settlement and significant injunctive relief was obtained for a class of black and Hispanic applicants who sought to be New York City firefighters but were denied or delayed employment due to racial discrimination);
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) ($40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts);
- *Gunther v. Capital One, N.A.*, No. 09-2966 (E.D.N.Y.) (a net settlement resulting in class members receiving 100% of their damages was obtained);
- *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.) ($37 million settlement obtained on behalf of class of propane

purchasers who alleged defendants overcharged the class for under-filled propane tanks);

- *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) ($7.3 million settlement pending on behalf of class of consumers who were misled into accepting purportedly 0% interest offers); and

- *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) ($6.1 settlement obtained on behalf of a class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural").

Moreover, Scott+Scott is currently serving in a leadership capacity in a number of class action consumer protection cases, including:

- *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (claims involving data breach and the theft of the personal and financial information of 56 million credit and debit card holders);

- *In re Target Corp. Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (claims involving data breach and the theft of the personal and financial information of customers holding approximately 110 million credit and debit cards);

- *In re Herbal Supplements Marketing and Sales Practices Litigation*, MDL No. 2519 (N.D. Ill.) (claims on behalf of a class of consumers alleging major retail-chain defendants misrepresent the ingredients in store-branded herbal supplements); and

- *In re L'Oreal Wrinkle Cream Marketing and Sales Practices Litigation*, MDL No. 2415 (D.N.J.) (claims on behalf of a class of consumers alleging defendants misrepresent the anti-aging benefits of certain of their products).

SECURITIES AND CORPORATE GOVERNANCE

Scott+Scott represents individuals and institutional investors that have suffered from stock fraud and corporate malfeasance. Scott+Scott's philosophy is simple – directors and officers should be truthful in their dealings with the public markets and honor their duties to their shareholders. Since its inception, Scott+Scott's securities and corporate governance litigation department has developed and maintained a reputation of excellence and integrity recognized by state and federal and state courts across the country. "It is this Court's position that Scott+Scott did a superlative job in its representation, which substantially benefited Ariel . . . . For the record, it should be noted that Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case . . . . They have possessed a knowledge of the issues presented and this knowledge has always been used to the benefit of all investors." *N.Y. Univ. v. Ariel Fund Ltd.*, No. 603803/08, slip. op. at 9-10 (N.Y. Sup. Ct. Feb. 22, 2010). "The quality of representation here is demonstrated, in part, by the result achieved for the class. Further, it has been this court's experience, throughout the ongoing litigation of this matter, that counsel have conducted themselves with the utmost professionalism and respect for the court and the judicial

process." *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884, 2007 WL 2115592, at *5 (D. Conn. July 20, 2007).

Scott+Scott has successfully prosecuted numerous class actions under the federal securities laws, resulting in the recovery of hundreds of millions of dollars for shareholders. Representative cases prosecuted by Scott+Scott under the Securities Exchange Act of 1934 include: *In re Priceline.com, Inc. Sec. Litig.*, No. 00-cv-01884 (D. Conn. July 19, 2007) ($80 million settlement); *Irvine v. ImClone Sys., Inc.*, No. 02-cv-00109 (S.D.N.Y. July 29, 2005) ($75 million settlement); *Cornwell v. Credit Suisse Group*, No. 08-cv-03758 (S.D.N.Y. July 20, 2011) ($70 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.*, No. 02-cv-2133 (D. Conn. June 13, 2008) ($26.5 million settlement); and *St. Lucie County Fire District Firefighter's Pension Trust Fund v. Oilsands Quest Inc.*, No. 11-cv-1288-JSR (S.D.N.Y. Dec. 6, 2013) ($10.23 million settlement) ($7.85 million settlement preliminarily approved). Representative cases prosecuted by Scott+Scott under the Securities Act of 1933 include: *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash. Jan. 7, 2014) ($26 million settlement); *In re Pacific Biosciences Securities Litigation,* No.CIV509210 (Cal. Super. Ct., San Mateo County, Oct. 31, 2013) ($7.68 million settlement); *West Palm Beach Police Pension Fund v. CardioNet, Inc.*, No. 37-2010-00086836-CU-SL-CTL (Cal. Super. Ct., San Diego County, 2010) ($7.25 million settlement); *Parker v. National City Corp.*, No. CV-08-657360 (Ohio Ct. Com. Pl., Cuyahoga County, June 23, 2010) ($5.25 million settlement); and *Hamel v. GT Solar International, Inc.*, No. 217-2010-CV-05004 (N.H. Super. Ct., Merrimack County, May 10, 2011) ($10.25 million settlement).

Scott+Scott currently serves as court-appointed lead counsel in various federal securities class actions, including *Birmingham Retirement and Relief System, v. S.A.C. Capital Advisors*, No. 1:12-cv-09350 (S.D.N.Y. June 17, 2013); *In re NQ Mobile Securities Litigation*, No. 13-cv-07608 (S.D.N.Y. April 9, 2014); *In re Conn's Inc. Securities Litigation*, No. 14-cv-00548 (S.D. Tex. June 3, 2014) and *Weston v. RCS Capital Corp.,* No. 14-10136 (S.D.N.Y., Dec. 29, 2014).

In addition to prosecuting federal securities class actions, Scott+Scott has a proven track record of handling corporate governance matters through its extensive experience litigating shareholder derivative actions. In addition, Scott+Scott has been singularly successful in its shareholder derivative appellate practice, and as a result, has been instrumental in fashioning the standards in this area of law. In *Westmoreland County Employee Retirement System v. Parkinson*, No. 12-3342 (7th Cir. Aug. 16, 2013), the Seventh Circuit clarified the parameters of demand futility in those instances where a majority of directors of a corporation are alleged to have breached the fiduciary duty of loyalty by consciously disregarding positive law. In *Cottrell v. Duke,* No. 12-3871 (8th Cir. Dec. 28, 2013), the Eighth Circuit, in a case of first impression, clarified that the *Colorado River* stay is virtually never appropriate where there are exclusive federal claims. And in *King v. Verifone Holdings, Inc.*, No. 330, 2010 (Del. Jan. 28, 2011), the Supreme Court of Delaware has clarified the availability of the Delaware Corporate Code Section 220 "books and records" demands to a shareholder whose original plenary action was dismissed without prejudice in a federal district court. Representative actions prosecuted by Scott+Scott include: *In re DaVita Healthcare Partners Derivative Litigation*, No. 13-cv-1308 (D. Colo.) (corporate governance reform valued at $100 million); *North Miami Beach General Employees Retirement Fund v. Parkinson*, No. 10C6514 (N.D. Ill.) (corporate governance valued between $50 million

and $60 million); *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894-RMW (RS) (N.D. Cal. Aug. 11, 2009) ($54.9 million and corporate governance reforms); *In re Qwest Communications International, Inc.*, No. Civ. 01-RB-1451 (D. Colo. June 15, 2004) ($25 million and corporate governance reform); *Plymouth County Contributory Retirement Fund v. Hassan*, No. 08-cv-1022 (D.N.J.) (settlement of derivative claims against Merck Schering Plough and its officers and directors providing for corporate governance reforms valued between $50 million and $75 million); *Carfagno v. Schnitzer*, No. 08-cv-912-SAS (S.D.N.Y. May 18, 2009) (modification of terms of preferred securities issued to insiders valued at $8 million); and *Garcia v. Carrion*, No. 3:09-cv-01507 (D.P.R. Sept. 12, 2011) (settlement of derivative claims against the company and its officers and directors providing for corporate governance reforms valued between $10.05 million and $15.49 million).

Currently, Scott+Scott is actively prosecuting shareholder derivative actions, including *In re Bio-Rad Laboratories, Inc. Stockholder Litigation*, C.A. No. 11387 (Del. Ch. Aug. 13, 2015); *In re Tile Shop Holdings, Inc. Stockholder Derivative Litigation*, C. A. No. 108884 (Del. Ch. July 31, 2015); *West Palm Beach Fire Pension Fund v. Page*, No. 15-1334 (N.D. Cal. March 23, 2015); *In re Duke Energy Corp. Coal Ash Derivative Litigation*, C.A. No. 9682 (Del. Ch. May 21, 2014); and *In re OSI Systems, Inc. Derivative Litigation*, No. 14-2910 (C. D. Cal. April 15, 2014).

EMPLOYEE BENEFITS (ERISA)

Scott+Scott litigates complex class actions across the United States on behalf of corporate employees alleging violations of the federal Employee Retirement Income Security Act. ERISA was enacted by Congress to prevent employers from exercising improper control over retirement plan assets and requires that pension and 401(k) plan trustees, including employer corporations, owe the highest fiduciary duties to retirement plans and their participants as to their retirement funds. Scott+Scott is committed to continuing its leadership in ERISA and related employee-retirement litigation, as well as to those employees who entrust their employers with hard-earned retirement savings. Representative recoveries by Scott+Scott include: *In re Royal Dutch/Shell Transport ERISA Litigation*, No. 2:04-cv-01398-JWB-SDW (D.N.J. Aug. 30, 2005) ($90 million settlement); *In re General Motors ERISA Litigation*, No. 2:05-cv-71085-NGE-RSW (E.D. Mich. June 5, 2008) ($37.5 million settlement); and *Rantala v. ConAgra Foods*, No. 8:05-cv-00349-LES-TDT (D. Neb.) ($4 million settlement).

CIVIL RIGHTS LITIGATION

Scott+Scott has also successfully litigated cases to enforce its clients' civil rights. In *The Vulcan Society, Inc. v. The City of New York*, No. 1:07-cv-02067-NGG-RLM (E.D.N.Y.), Scott+Scott was part of a team of lawyers representing a class of black applicants who were denied or delayed employment as New York City firefighters due to decades of racial discriminatory conduct. The district court certified the class in a post-*Walmart v. Dukes* decision, granted summary judgment against the City on both intentional discrimination and disparate impact claims, and after trial ordered broad injunctive relief, including a new examination, revision of the application procedure, and continued monitoring by a court-appointed monitor for at least 10 years. The back pay and compensatory damage award will be determined in a subsequent ruling.

In *Hohider v. United Parcel Services, Inc.*, No. 2:04-cv-00363-JFC (W.D. Penn.), Scott+Scott obtained significant structural changes to UPS's Americans with Disabilities Act compliance policies and monetary awards for some individual employees in settlement of a ground-breaking case seeking nationwide class certification of UPS employees who were barred from reemployment after suffering injuries on the job.

ATTORNEY BACKGROUND AND EXPERIENCE

MELVIN SCOTT is a graduate of the University of Connecticut (B.A. 1950) and the University of Kentucky (M.A. 1953; LL.B. 1957). Mr. Scott founded the firm in 1975. He formerly practiced in Kentucky and is presently admitted to practice in Connecticut and Pennsylvania. Mr. Scott was a member of the Kentucky Law Review, where he submitted several articles for publication. He has served as an Attorney Trial Referee since the inception of the program in the State of Connecticut and is a member of the Fee Dispute Committee for New London County. Mr. Scott also formerly served as a Special Public Defender in criminal cases and as a member of the New London County Grievance Committee. Mr. Scott actively represents aggrieved parties in securities, commercial and criminal litigation and served or serves as counsel in *Irvine, et al. v. ImClone Systems, Inc.*; *Schnall v. Annuity and Life Re (Holdings) Ltd.*; *In re 360networks Class Action Securities Litigation*; *In re General Motors ERISA Litigation*, and *Hohider v. UPS*, among others.

DAVID R. SCOTT is the managing partner of Scott+Scott. He represents multinational corporations, hedge funds, and institutional investors in high-stakes complex litigation, including antitrust, commercial, and securities actions.

Mr. Scott has received widespread recognition for his antitrust work. He has been elected to Who's Who Legal: Competition 2015, 2016, and 2017 which lists the world's top antitrust lawyers who are selected based on comprehensive, independent survey work with both general counsel and lawyers in private practice around the world. He has also received a highly recommended ranking by Benchmark Litigation for each of the years 2013-2015.

Mr. Scott's antitrust experience includes matters dealing with unlawful price-fixing cartels, illegal tying, and anticompetitive monopolization. Currently, Mr. Scott is lead counsel in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, a cartel action alleging a longstanding and widespread conspiracy to manipulate the foreign exchange market, in which billions in settlements have been announced to date. He is co-lead counsel in a class action case alleging that the world's largest banks and their broker, ICAP, entered a conspiracy to manipulate ISDAfix, a financial benchmark that is tied to over $379 trillion of outstanding interest-rate swaps around the world.

Mr. Scott's previous antitrust cases have resulted in significant recoveries for victims of price-fixing cartels. Among other cases, Mr. Scott served as co-lead counsel in *Dahl v Bain Capital Partners*, No. 1:07-cv-12388 (D. Mass.), an action alleging that the largest private equity firms in the United States colluded to suppress prices that shareholders received in leveraged buyouts and that the defendants recently agreed to settle for $600 million. He also played a leadership role in a lawsuit accusing Visa and MasterCard of engaging in anticompetitive conduct in setting credit card and debit card acceptance fees that recently settled for a record $7.25 billion. And he was lead counsel in *Red Lion Medical Safety v. Ohmeda*, No. 06-cv-1010 (E.D. Cal.), a lawsuit alleging that Ohmeda, one of the leading manufacturers of medical anesthesia equipment in the United States, excluded independent service organizations from the market for servicing its equipment. The case was successfully resolved in settlement negotiations before trial.

Mr. Scott has also taken the lead in bringing claims on behalf of institutional investors, such as sovereign wealth funds, corporate pension schemes, and public employee retirement funds, against mortgaged-backed securities trustees for failing to protect investors. Such cases include *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. The Bank of New York Mellon* (MBS sponsored by Countrywide Financial Corp.), No. 1:11-cv-05459 (S.D.N.Y.); *Retirement Board of the Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America* (MBS sponsored by Washington Mutual Bank), No. 1:12-cv-02865 (S.D.N.Y.); and *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association* (MBS sponsored by Bear Stearns), No. 1:11-cv-08066 (S.D.N.Y.). He also represented a consortium of regional banks in litigation relating to toxic auction rate securities ("ARS") and obtained a sizable recovery for the banks in a confidential settlement. This case represents one of the few ARS cases in the country to be successfully resolved in favor of the plaintiffs.

In addition, Mr. Scott has extensive experience litigating shareholder derivative cases, achieving substantial corporate governance reforms on behalf of his clients. Representative actions include: *In re Marvell Tech. Group Ltd. Derivative Litigation*, No. C-06-03894 (N.D. Cal.) (settlement obtaining $54.9 million in financial benefits for the company, including $14.6 million in cash, and corporate governance reforms to improve stock option granting procedures and internal controls, valued at more than $150 million); *In re Qwest Communications International, Inc*., No. 01-RB-1451 (D. Colo.) (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence); *Plymouth County Contributory Retirement System v. Hasan*, No. 08-1022 (D.N.J.) (settlement requiring annual reporting to the company's board where any clinical drug trial is delayed, valued at between $50 million - $75 million); *Carfagno v. Schnitzer*, No. 08-cv-0912 (S.D.N.Y.) (settlement resulting in modification of terms of preferred securities issued to insiders, valued at $8 million); and *Garcia v. Carrion*, No. 09-cv-1507 (D.P.R.) (settlement achieving reforms aimed at rectifying internal control weaknesses and improving director education in accounting and ethics, valued at between $10 million - $15 million).

Mr. Scott is frequently quoted in the press, including in publications such as *The Financial Times*, *The Guardian*, *The Daily Telegraph*, *The Wall Street Journal*, and *Law360*. He is regularly invited to speak at conferences around the world and before Boards of Directors and trustees responsible for managing institutional investments.

Mr. Scott is admitted to practice in Connecticut, New York, the United States Tax Court, and numerous United States District Courts.

Mr. Scott is a graduate of St. Lawrence University (B.A., *cum laude*, 1986), Temple University School of Law (J.D., Moot Court Board, 1989), and New York University School of Law (LLM in taxation).

CHRISTOPHER M. BURKE chairs Scott+Scott's competition practice and sets the Firm's litigation standards. Mr. Burke's principal practice is in complex antitrust litigation, particularly in the financial services industry and he has served as lead counsel in some of the world's largest

financial services antitrust matters. He currently sits as a partner in the firm's San Diego and New York offices.

Currently, Mr. Burke is co-lead counsel in *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, 13-cv-7789 (S.D.N.Y.) ($2 billion settlement); *Alaska Electrical Pension Fund v. Bank of America Corporation*, 14-cv-7126 (S.D.N.Y) (ISDAfix litigation) ($325 million settlement); and *Axiom Investment Advisors, LLC, by and through its Trustee, Gildor Management LLC v. Barclays Bank PLC*, 15-cv-09323 (S.D.N.Y.) ($50 million settlement).
Mr. Burke served as co-lead counsel in *Dahl v. Bain Capital Partners*, 07-cv-12388 (D. Mass.) ($590.5 million settlement); *In re Currency Conversion Antitrust Litigation*, MDL No. 1409 (S.D.N.Y.) ($336 million settlement); *In re Payment Card Interchange Fee & Merchant Discount Antitrust Litigation*, MDL No. 1720 (E.D.N.Y.); *LiPuma v. American Express Co.*, Case No. 1:04-cv-20314 (S.D. Fla.) ($90 million settlement); and was one of the trial counsel in *Schwartz v. Visa*, Case No. 822505-4 (Alameda Cty. Super. Ct.) ($780 million plaintiff's judgment after six months of trial); and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 1030 (M.D. Fla.). Mr. Burke was one of the original lawyers in the *Wholesale Elec. Antitrust* cases in California, which settled for over $1 billion.

Further, Mr. Burke was trial counsel in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y.). He was also co-lead counsel for indirect purchasers in *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, MDL No. 1891 (C.D. Cal.) ($86 million settlement), and *In re Prudential Ins. Co. of America SGLI/VGLI Contract Litigation*, No. 11-md-2208 (D. Mass.) ($40 million settlement). Mr. Burke also organized and filed the first of the *In re Credit Default Swap Antitrust Litigation*, 13-md-2476 (S.D.N.Y.), matters.

Mr. Burke frequently lectures at professional conferences and CLEs on competition matters, including litigation surrounding financial benchmarks, class-barring arbitration clauses, the effects of *Twombly* in 12(b)(6) motions, and the increasing use of experts at class certification and trial. In 2014, he was recognized for his exemplary work in the *Dahl v. Bain Capital Partners* matter by the American Antitrust Institute and has regularly been designated as a Super Lawyer by Thomson Reuters.

Mr. Burke is a graduate of The Ohio State University (B.A. 1984), William & Mary (M.A. 1988), and the University of Wisconsin (M.A. 1989; J.D. 1993; Ph.D. 1996). He has also served as an Assistant Attorney General at the Wisconsin Department of Justice and has lectured on law-related topics, including constitutional law, law and politics, and civil rights at the State University of New York at Buffalo and at the University of Wisconsin. Mr. Burke's book, *The Appearance of Equality: Racial Gerrymandering, Redistricting, and the Supreme Court* (Greenwood, 1999), examines conflicts over voting rights and political representation within the competing rhetoric of communitarian and liberal strategies of justification.

Mr. Burke is admitted to practice by the Supreme Courts of the States of California, New York, and Wisconsin, and numerous United States District Courts and Courts of Appeal.

WALTER W. NOSS serves as the managing partner for Scott+Scott's San Diego office. He practices complex federal litigation with an emphasis on prosecuting antitrust actions on both a class-wide and individual, opt-out basis.

Currently, Mr. Noss represents class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate.

Mr. Noss represented class plaintiffs in *Dahl v. Bain Capital Partners LLC*, No. 1:07-cv-12388 (D. Mass.), a case challenging collusion among private equity firms. In *Dahl*, Mr. Noss served as one of the primary litigation counsel prosecuting the case, including deposing key managing directors, drafting dispositive motions, and arguing in court in opposition to defendants' summary judgment motions. The defendants in *Dahl* settled for $590.5 million.

Mr. Noss represented the indirect purchaser class plaintiffs in *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 2:12-cv-03824 (E.D. Pa.), a case challenging monopolistic conduct known as "product hopping" by the defendants. In *Mylan*, he was appointed sole lead counsel for the indirect class, and directed their prosecution and eventual settlement of the case for $8 million.

Mr. Noss also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum. He has previously represented out-out clients in *In re Rubber Chemicals Antitrust Litigation*, MDL No. 1648 (N.D. Cal.); *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.), which were cases involving price-fixing by horizontal competitors in the synthetic rubber industry.

Mr. Noss has experience successfully litigating in federal civil jury trials. In April 2011, Mr. Noss served as lead trial counsel in *Novak v. Gray*, No. 8:09-cv-00880 (M.D. Fla.), winning a $4.1 million jury verdict for breach of oral contract and fraudulent inducement. In December 2009, Mr. Noss served as plaintiffs' local counsel at trial in *Lederman v. Popovich*, No. 1:07-cv-00845 (N.D. Ohio), resulting in a $1.8 million jury verdict for plaintiffs on claims of breach of fiduciary duties, conversion, and unjust enrichment. In January and February 2006, Mr. Noss assisted the trial team for *In re Scrap Metal Antitrust Litigation*, No. 1:02-cv-0844 (N.D. Ohio 2006), resulting in a $34.5 million class action plaintiffs' verdict.

Mr. Noss graduated *magna cum laude* from the University of Toledo with a Bachelor of Arts in Economics in 1997 and *with honors* from The Ohio State University College of Law in 2000. He is a member of the California, New York, and Ohio Bars. Mr. Noss is also a member of the bars of the United States District Courts for the Northern, Central, and Southern Districts of California, the Southern District of New York, and the Northern and Southern Districts of Ohio, as well as the United States Court of Appeals for the Sixth, Ninth, and Eleventh Circuits. Prior

to joining Scott+Scott in April 2004, he was an associate in the Cleveland, Ohio office of Jones Day.

KRISTEN M. ANDERSON is a partner in the firm's New York office. Ms. Anderson's practice focuses on complex and class action litigation with an emphasis on antitrust matters. Ms. Anderson is recognized as a Rising Star in the 2014-15, 2015-16, and 2016-17 editions of Super Lawyers.

A substantial portion of Ms. Anderson's practice is devoted to antitrust cases within the financial services industry. Currently, Ms. Anderson represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *Axiom Investment Advisors, LLC, by and through its Trustee Gildor Management, LLC v. Deutsche Bank AG*, No. 15-cv-9945 (S.D.N.Y.), and *Axiom Investment Advisors, LLC, by and through its Trustee Gildor Management LLC v. Barclays Bank PLC*, No. 15-cv-9323 (S.D.N.Y.), cases alleging misconduct in the foreign exchange market by many global financial institutions. Ms. Anderson represented pension funds and individual investors in *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.) ($590.5 million settlement), an antitrust action alleging collusion in the buyouts of large publicly traded companies by private equity firms. Ms. Anderson also served on the trial team representing certified classes of cardholders in antitrust cases challenging class action-banning arbitration clauses in credit card agreements as restraints of trade in *Ross v. Bank of America N.A.*, No. 05-cv-7116, MDL No. 1409 (S.D.N.Y.) and *Ross v. American Express Co.*, No. 04-cv-5723, MDL No. 1409 (S.D.N.Y).

Ms. Anderson is an active member of the American Bar Association's Antitrust Section. She currently serves as Vice Chair of the Antitrust Section's Trial Practice Committee and is co-editor of the Committee's newsletter, Trying Antitrust. She has been a Vice Chair of the Antitrust Section's Books & Treatises Committee. She has also been a contributing author to the Antitrust Section's *Antitrust Discovery Handbook* (2d ed.), *Joint Venture Handbook* (2d ed.), and the *2010 Annual Review of Antitrust Law Developments*. In addition, Ms. Anderson served as an editor for *Model Jury Instructions in Civil Antitrust Cases* (2016 ed.) and *The Woman Advocate* (2d ed.), both published by the American Bar Association. Ms. Anderson was a co-author of an article appearing in the Fall 2014 edition of *Competition: Journal of the Antitrust and Unfair Competition Section of the State Bar of California*, entitled *The Misapplication of Associated General Contractors to Cartwright Act Claims*, 23 COMPETITION: J. ANTI. & UNFAIR COMP. L. SEC. ST. B. CAL. 120 (2014).

Ms. Anderson is the Editor-in-Chief of MARKET+LITIGATION, Scott+Scott's monthly newsletter. She is also active in the firm's continuing legal education programs, speaking on e-discovery, evidence, and antitrust issues.

Ms. Anderson is a graduate of St. Louis University (B.A. Philosophy, *summa cum laude*, 2003) and the University of California, Hastings College of the Law (J.D. 2006). During law school, Ms. Anderson served as an extern at the U.S. Department of Justice, Antitrust Division, in San Francisco. While at Hastings, Ms. Anderson also served as an extern to Justice Kathryn Mickle Werdegar of the Supreme Court of California and was the research assistant to Professor James R. McCall in the areas of antitrust and comparative antitrust law.

Ms. Anderson is admitted to practice in California, New York, and the District of Columbia.

JOSEPH P. GUGLIELMO is a partner in the firm's New York office and represents institutional and individual clients in securities, antitrust, and consumer litigation in federal and state courts throughout the United States and has achieved numerous successful outcomes.

Recently, Mr. Guglielmo, along with other attorneys at Scott+Scott, was recognized for his efforts representing New York University in obtaining a monumental temporary restraining order of over $200 million from a Bernard Madoff feeder fund. Specifically, New York State Supreme Court Justice Richard B. Lowe III stated, "Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court."

Mr. Guglielmo serves in a leadership capacity in a number of complex antitrust, securities, and consumer actions, including: *In Re: Disposable Contact Lens Antitrust Litigation*, Case No. 3:15-md-2626 (M.D. Fla.), claims on behalf of a class of contact lens purchasers alleging violations of the antitrust laws, *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.), claims involving data breach and the theft of the personal and financial information of 56 million credit and debit card holders, *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.), claims involving data breach and the theft of the personal and financial information of customers holding approximately 110 million credit and debit cards. *In re Herbal Supplements Marketing and Sales Practices Litigation*, MDL No. 2619 (N.D. Ill.), claims on behalf of a class of consumers alleging major retail-chain defendants misrepresented the ingredients in store-branded herbal supplements. Mr. Guglielmo is also actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789-LGS (S.D.N.Y), which involves claims on behalf of purchasers of foreign exchange instruments alleging violations of federal antitrust laws.

Mr. Guglielmo has achieved significant victories and obtained numerous settlements for his clients. He was one of the principals involved in the litigation and settlement of *In re Managed Care Litigation*, MDL No. 1334 (S.D. Fla.), which included settlements with Aetna, CIGNA, Prudential, Health Net, Humana, and WellPoint, providing monetary and injunctive benefits exceeding $1 billion. Additional cases Mr. Guglielmo played a leading role and obtained substantial recoveries for his clients include: *Love v. Blue Cross and Blue Shield Ass'n*, No. 03-cv-21296 (S.D. Fla.), which resulted in settlements of approximately $130 million and injunctive benefits valued in excess of $2 billion; *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1897 (D.N.J.), settlements in excess of $180 million; *In re Pre-Filled Propane Tank Marketing and Sales Practices Litigation*, MDL No. 2086 (W.D. Mo.), consumer settlements in excess of $40 million; *Bassman v. Union Pacific Corp.*, No. 97-cv-02819 (N.D. Tex.), $35.5 million securities class action settlement; *Garcia v. Carrion*, Case No. CV. 11-1801 (D. P.R.), substantial corporate governance reforms; *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.), $26 million securities class action settlement, *Murr v. Capital One Bank (USA), N.A.*, No. 13-cv-1091 (E.D. Va.) $7.3 million settlement pending on behalf of class of consumers who were misled into accepting

purportedly 0% interest offers, and *Howerton v. Cargill, Inc.*, No. 13-cv-00336 (D. Haw.) $6.1 settlement obtained on behalf of class of consumers who purchased Truvia, purported to be deceptively marketed as "all-natural."

Mr. Guglielmo was the principle litigator and obtained a significant opinion from the Hawaii Supreme Court in *Hawaii Medical Association v. Hawaii Medical Service Association*, 113 Hawaii 77 (Haw. 2006), reversing the trial court's dismissal and clarifying rights for consumers under the state's unfair competition law.

Mr. Guglielmo lectures on electronic discovery and is a member of the Steering Committee of the Sedona Conference®, an organization devoted to providing guidance and information concerning issues such as discovery and production issues, as well as areas focusing on antitrust law, complex litigation, and intellectual property. Recently, Mr. Guglielmo was selected as a speaker for electronic discovery issues at the Sedona Conference as well as the Advanced eDiscovery Institute at Georgetown University Law Center. Mr. Guglielmo was also recognized for his achievements in litigation by his selection to *The National Law Journal*'s "Plaintiffs' Hot List." In 2016, Mr. Guglielmo was named by Super Lawyers as a top Antitrust lawyer in New York, New York.

Mr. Guglielmo graduated from the Catholic University of America (B.A., *cum laude*, 1992; J.D., 1995) and also received a Certificate of Public Policy.

Mr. Guglielmo is admitted to practice before numerous federal and state courts: the United States Supreme Court, the United States Court of Appeals for the First Circuit, Second Circuit, Third Circuit, Eighth Circuit and Ninth Circuit, the United States District Courts for the Southern and Eastern Districts of New York, District of Massachusetts, District of Connecticut, District of Colorado, Eastern District of Wisconsin, New York State, the District of Columbia, and the Commonwealth of Massachusetts. He is also a member of the following associations: District of Columbia Bar Association, New York State Bar Association, American Bar Association, and The Sedona Conference®.

WILLIAM C. FREDERICKS is a partner in the firm's New York office. Mr. Fredericks holds a B.A. (with high honors) from Swarthmore College, an M. Litt. in International Relations from Oxford University (England), and a J.D. from Columbia University Law School. At Columbia, Mr. Fredericks was a three-time Harlan Fiske Stone Scholar, a Columbia University International Fellow, and the winner of the law school's Beck Prize (property law), Toppan Prize (advanced constitutional law), Greenbaum Prize (written advocacy), and Dewey Prize (oral advocacy).

After clerking for the Hon. Robert S. Gawthrop III (E.D. Pa.), Mr. Fredericks spent seven years practicing securities and complex commercial litigation at Simpson Thacher & Bartlett LLP and Willkie Farr & Gallagher LLP in New York before moving to the plaintiffs' side of the bar in 1996. Since then, he has represented investors as a lead or co-lead plaintiff in dozens of securities class actions, including *In re Wachovia Preferred Securities and Bond/Notes Litig.*, No. 09-cv-6351 (S.D.N.Y.) (total settlements of $627 million, reflecting the largest recovery ever in a pure Securities Act case not involving any parallel government fraud claims); *In re Rite Aid Securities Litig.*, 99-cv-1349 (E.D. Pa.) (total settlements of $323 million, including the then-second largest securities fraud settlement ever against a Big Four accounting firm); *In re Sears*

Roebuck & Co. Sec. Litig., No. 02-cv-07527 (N.D. Ill.) ($215 million settlement, representing the largest §10(b) class action recovery ever not involving either a financial restatement or parallel government fraud claims); *In re State Street ERISA Litig.*, No. 07-cv-8488 (S.D.N.Y.) (one of the largest ERISA class settlements to date) and *Irvine v. Imclone Systems, Inc.*, No. 02-cv-0109 (S.D.N.Y.) ($75 million settlement). Mr. Fredericks also played a lead role on the team that obtained a rare 9-0 decision for securities fraud plaintiffs in the U.S. Supreme Court in *Merck & Co., Inc. v. Reynolds*, No. 08-905, and has coauthored several amicus briefs in other Supreme Court cases involving securities issues (including the recent *Halliburton* and *Amgen* cases). More recently, Mr. Fredericks has also played a major role in litigating claims relating to mortgage-backed securities ("MBS") arising out of the financial crisis.

Mr. Fredericks is recognized in the 2014-15 edition of "America's Best Lawyers" in the field of commercial litigation, and in the 2014-15 edition of New York's "Super Lawyers." He is a frequent panelist on securities litigation programs sponsored by various organizations, including the Practising Law Institute (PLI) and the American Law Institute/American Bar Association (ALI/ABA). He is a member of the New York City Bar Association (former chair, Committee on Military Affairs and Justice), the Federal Bar Council and the American Bar Association. His recent publications include "Bringing a Claim for Securities Fraud: Pre-Filing Investigation to Complaint" (PLI 2012) and "'Bet-the-Company' Litigation: Settlement" (PLI 2011).

SYLVIA M. SOKOL is a New York- and London-based partner in the firm's Antitrust and Competition Law Practice. She focuses on representing national and international clients in litigation involving domestic and international cartels. Ms. Sokol has substantial experience in all aspects of complex litigation, including the day-to-day management of cases. She also has substantial experience in counseling corporate clients, evaluating potential claims, and developing strategies to recoup losses stemming from anticompetitive conduct.

Ms. Sokol currently represents a nationwide class in price-fixing litigation regarding the $5.3 trillion-a-day foreign exchange market. She also represents a proposed nationwide class in an action involving ISDAfix, a financial benchmark that is tied to over $379 trillion of interest-rate swaps around the world. In addition, Ms. Sokol represents several large multinational corporations alleging that Goldman Sachs, JPMorgan, Glencore, and their warehouse affiliates conspired to restrict the supply of aluminum in London Metal Exchange-approved warehouses. And she represents several government entities in a national lawsuit alleging bid-rigging in the municipal derivatives market.

In addition, Ms. Sokol's civil litigation experience has involved defending corporate clients charged with unlawful business practices and monopolizations. She has also represented clients in criminal and extradition matters.

Ms. Sokol was selected for the International Who's Who of Competition Lawyers & Economists and for Competition - U.S. in 2016 and 2017. Honorees are selected based on comprehensive and independent survey responses received from general counsel and private practitioners around the world. She has been selected to be a Fellow in The Trial Lawyer Honorary Society of the Litigation Counsel of America, which is a trial lawyer honorary society composed of less than one-half of one percent of American lawyers. *Lawyer Monthly* magazine awarded her the

Women in Law Award 2017. She was also named a "Super Lawyer" in 2011, 2012, and 2014, Super Lawyers Northern California Edition, and was named a "Super Lawyer" in 2015 and 2016, Super Lawyers New York Metro Edition.

She is a 1998 graduate of the New York University School of Law (*cum laude*), and completed her undergraduate studies at the University of British Columbia. After law school, Ms. Sokol was awarded the Soros Justice Fellowship to serve a year in the Capital Habeas Unit of the Federal Public Defender's Office, where she represented clients condemned to death and developed training materials for members of the capital defense bar. She then served as a judicial law clerk to the Honorable Warren J. Ferguson, United States Court of Appeals for the Ninth Circuit, before spending several years working at Morrison & Foerster LLP.

Ms. Sokol is a member of the American Bar Association and is admitted to practice in New York, California, and the District of Columbia. She is also admitted to the Southern District of New York, the Northern, Southern, and Eastern Districts of California, as well as the United States Supreme Court.

She is bilingual in English and French, and holds French and United States citizenships.

PETER A. BARILE III is a partner in Scott+Scott's competition practice. His focus is on complex antitrust and commodity litigation.

Mr. Barile has extensive experience representing clients on both sides of the docket in a variety of industries and contexts, from consumers and investors to institutions and corporations, whether as individual plaintiffs, class plaintiffs, opt-outs, or defendants in complex matters. Prior to joining the firm, he practiced both in New York and in Washington D.C., with major law firms renowned for their historically leading antitrust practices.

Mr. Barile devotes a substantial amount of his practice to federal antitrust and commodity class action litigation involving the financial services industry in the Southern District of New York. Mr. Barile is or has been involved in representing investor rights in major cases involving commodities and financial benchmarks, including: *Aluminum*, *Cotton*, *Crude Oil*, *FX*, *Gold*, *ISDAfix*, *LIBOR*, *Silver*, and *Zinc*.

He also has significant experience litigating high-tech antitrust cases in the Northern District of California, including *In re Online DVD Antitrust Litigation*; *In re Lithium Ion Batteries Antitrust Litigation*; and *In re High Tech Employees Antitrust Litigation*.

In addition to his work in federal district trial courts, Mr. Barile has considerable experience in other arenas, including the Judicial Panel on Multidistrict Litigation, federal Circuit Courts of Appeal, and the United States Supreme Court.

Mr. Barile is active in the antitrust bar, having held a number of leadership posts in the ABA and other organizations. He serves on the Advisory Board of the Loyola Institute for Consumer Antitrust Studies. Mr. Barile has published numerous articles and served as a panelist or speaker

on antitrust issues. His work has been cited by the Federal Trade Commission and the Antitrust Modernization Commission, as well as leading academics and practitioners.

Mr. Barile also has helped nonprofit advocacy groups be heard in matters of national importance as Friends of the Court in major cases before the United States Supreme Court. His work has included *Leegin Creative Leather Products, Inc. v. PSKS, Inc*., 551 U.S. 877 (2007), in which he served as lead counsel for *amicus curiae* Consumer Federation of America in a landmark antitrust case on resale price fixing, and *Giles v. State of California*, 554 U.S. 353 (2008), in which he served as lead counsel for *amicus curiae* Battered Women's Justice Project, in a case concerning the scope of the Confrontation Clause of the United States Constitution.

Mr. Barile earned his law degree in 1999 from the University of Connecticut School of Law, *magna cum laude*, where he was an Editor of the Connecticut Law Review and Moot Court Champion. His bachelor's degree is from the University of Connecticut.

Mr. Barile is a member of the bars of New York, Connecticut, and the District of Columbia. He is admitted to practice in the United States District Courts for the Southern District of New York, Eastern District of New York, District of Columbia, Northern District of Illinois, District of Connecticut; United States Courts of Appeal for the Second, Fourth, Sixth, Seventh, Ninth, Federal, and District of Columbia Circuits, and the Supreme Court of the United States.

BELINDA HOLLWAY is the head of Scott+Scott's office in London. She has over a decade of competition law experience, and specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal, particularly on behalf of multinational corporations in follow-on damages claims. She has extensive expertise in developing and coordinating multijurisdictional litigation strategies, both within Europe and beyond. She also represents investors in shareholder litigation.

Prior to joining Scott+Scott, Ms. Hollway spent nine years in the London office of Freshfields Bruckhaus Deringer LLP. She represented clients across a wide range of industries, acting in many of the leading English competition damages cases, such as *Cooper Tire*, relating to the synthetic rubber cartel, and *National Grid v. ABB*, relating to the cartel in gas insulated switchgear. She was the lead associate on the defence team in *Enron v. EWS*, which was the first follow-on damages claim ever to reach trial in the Competition Appeal Tribunal. Her wide experience on the defence side gives her a special insight into the issues that claimants must address and overcome in order to recoup losses stemming from breaches of competition law in Europe.

Ms. Hollway has also acted for numerous clients in competition law investigations, both internal investigations and those brought by the UK Office of Fair Trading (now the Competition and Markets Authority) and the European Commission. She has been involved in immunity applications, Commission cartel settlements, and contested cases. From this work, she has an in-depth understanding of the interaction between private and public enforcement in Europe and the ramifications that public enforcement has for the strategy and progression of damages claims.

Ms. Hollway attended the Australian National University and graduated in 2001 with a First Class Honours degree in History and a First Class Honours Degree and University Medal in

Law. She then spent a year as an Associate to Her Honour Justice Catherine Branson at the Federal Court of Australia and then worked for the competition and litigation teams of Allens Arthur Robinson in Sydney, prior to moving to the United Kingdom in 2006. She has a Master's Degree in Competition Law from King's College London.

She has published on competition law issues, including in relation to the EU Damages Directive and has been quoted in the press on competition law in Europe.

Ms. Hollway is admitted to practice in England and Wales and in New South Wales, Australia.

BETH A. KASWAN, during her tenure as an Assistant U.S. Attorney and subsequent promotions to Chief of the Commercial Litigation Unit and Deputy Chief of the Civil Division of the U.S. Attorney's Office for the Southern District of New York, was appointed by the FDA as lead counsel in litigation to enjoin the manufacture of adulterated generic drugs in the landmark case *United States v. Barr Laboratories, Inc.*, 812 F. Supp. 458 (D.N.J. 1993). Ms. Kaswan, who began her career as an accountant at the offices of Peat, Marwick, Mitchell & Co., and then worked as a civil trial attorney at the U.S. Department of Justice in Washington, D.C., is the recipient of several awards from the Justice Department and other agencies she represented, including the Justice Department's John Marshall award, Special Commendation from the Attorney General, a Superior Performance award from the Executive Office of U.S. Attorneys and Tax Division Outstanding Achievement awards.

While at Scott+Scott, Ms. Kaswan served as lead counsel in *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass Through Certificates*, No. 09-cv-00037 (W.D. Wa.), the WaMu RMBS Section 11 Securities Act case which settled after plaintiffs succeeded in defeating the defendants' motion for summary judgment, only weeks before it was scheduled to proceed to a jury trial. Ms. Kaswan just completed the nine-week trial in *In the Matter of the Application of The Bank of New York Mellon*, Index No. 651786/2011 (N.Y. Supr. Ct.) in which she and other interveners challenged the proposed settlement between Bank of New York Mellon and Bank of America to resolve repurchase and servicing claims for 530 Countrywide trusts. She and others at Scott+Scott recently settled federal and state law claims against the Securitization Trustees for WaMu and Bear Stearns Trusts in *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, N.A.*, No. 12-cv-2865 (S.D.N.Y.) and *Oklahoma Police Pension and Retirement System v. U.S. Bank N.A.*, No. 11-cv-8066 (S.D.N.Y.), respectively. Ms. Kaswan brought a derivative suit on behalf of New York University against Ezra Merkin to freeze funds belonging to a feeder fund to Bernard Madoff. She also served as lead counsel to another shareholder derivative case, *Carfagno v. Schnitzer*, No. 08-CV-912-SAS (S.D.N.Y.), where she successfully negotiated a settlement on behalf of Centerline Holding Company and Centerline shareholders. Ms. Kaswan has served as lead counsel in *Cornwell v. Credit Suisse Group*, No. 08-cv-3758 (S.D.N.Y.) and *In re Tetra Technologies, Inc. Securities Litigation*, No. 08-cv-0965 (S.D. Tex.), among others.

Ms. Kaswan is a member of the New York and Massachusetts bars. Ms. Kaswan has been practicing law for over 35 years and is a partner in the firm's New York office.

JUDY SCOLNICK is a partner in the firm's New York office. Ms. Scolnick is a graduate of New York University (B.A., *cum laude* 1972), Brandeis University (M.A. Political Science Theory, 1973), and Boston College Law School (J.D., 1976), where she served on the Boston College Industrial and Commercial Law Review. She has extensive experience in the fields of shareholder derivative law, particularly in the pharmaceutical industry, employment law and employment class actions, and securities class actions. She has contributed substantially to recent jurisprudence expanding shareholders' rights to examine books and records of the corporations in which they hold stock. In *Cain v. Merck & Co., Inc.*, 415 N.J. Super. 319 (N.J. Super. A.D. 2010), the New Jersey Appellate Division agreed with Ms. Scolnick and held in a precedential decision that the New Jersey Business Corporation Act allows shareholders to inspect the minutes of board of directors and executive committee meetings upon a showing of proper purpose. In *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Supr. 2011), the Delaware Supreme Court ruled in a ground-breaking decision that plaintiffs may, in certain circumstances, inspect a corporation's books and records to bolster a shareholder derivative complaint even after they have filed a lawsuit.

She has served as lead counsel in many shareholder derivative actions and is currently lead counsel in *North Miami General Employees Retirement Fund v. Parkinson*, No. 10-cv-6514 (N.D. Ill.), a shareholder derivative case on behalf of pharmaceutical company, Baxter International, arising from the Board's failure to comply with FDA orders to remediate a medical device known as the Colleague Pump. She is also lead counsel in *Cottrell v. Duke*, No. 12-4041 (W.D. Ark.), a shareholder derivative action brought on behalf of Wal-Mart arising from a widespread bribery and cover-up conspiracy conducted by Wal-Mart executives and Board members.

Ms. Scolnick has experience litigating shareholder derivative actions at both the trial and appellate level. She successfully argued the Baxter appeal where the Court of Appeals for the Seventh Circuit, reversing a trial court's dismissal, held that a pension fund's complaint on behalf of all shareholders passed the pre-suit demand futility threshold test under Delaware substantive law. *Westmoreland County Employees' Retirement System v. Parkinson*, 727 F.3d 719 (7th Cir. 2013). Also in 2013, Ms. Scolnick obtained a landmark ruling in the Wal-Mart shareholder derivative litigation from the Court of Appeals for the Eighth Circuit. The Eighth Circuit reversed the district court's stay of the federal action in favor of a related proceeding in Delaware Chancery Court, and held that a *Colorado River* stay is never appropriate where the federal complaint alleges valid, exclusive federal claims. *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013).

Ms. Scolnick has also litigated a number of important employment discrimination class actions. These include *U.S. v. City of New York*, No. 07-cv-2067, 2011 WL 4639832 (E.D.N.Y. Oct. 5, 2011) (successfully representing a class of black applicants for entry-level firefighter jobs who were discriminated against by the City of New York), *Hohider v. UPS*, 243 F.R.D. 147 (W.D. Pa. 2007), *reversed and remanded*, 574 F.3d 169 (3d Cir. 2009), where although the Third Circuit reversed certification of a nationwide class of Americans with Disabilities Act protected UPS employees, Ms. Scolnick was able to negotiate with UPS changes to its return to work policy with regard to injured workers.

Ms. Scolnick began her career by serving as a law clerk to the late Honorable Anthony Julian of the United States District Court in Massachusetts. Thereafter, she served as a trial attorney in the Civil Division of the United States Department of Justice, where she was lead counsel in several high-profile employment discrimination lawsuits against various U.S. agencies around the country.

Ms. Scolnick has been selected for the past two years in Thompson Reuter's "New York Super Lawyers."

Ms. Scolnick is admitted to practice in New York, New Jersey, and Massachusetts.

DONALD A. BROGGI is a partner in the firm's New York office. Mr. Broggi is a graduate of the University of Pittsburgh (B.A., 1990) and Duquesne University School of Law (J.D., 2000). He is engaged in the firm's complex securities, antitrust, and consumer litigation, including: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *In re: Priceline.com Inc. Securities Litigation*, No. 00-cv-1884 (D. Conn.), *Irvine v. ImClone Systems, Inc.*, No. 02-cv-0109 (S.D.N.Y.), *In re: Rubber Chemicals Antitrust Litigation*, No. C04-01648 (N.D. Cal.), *In re: Plastics Additives Antitrust Litigation*, No. 03-cv-2038 (E.D. Pa.), and *In re Washington Mutual Mortgage-Backed Securities Litigation*, No. 09-cv-0037 (W.D. Wash.), among others.

Mr. Broggi also works with the firm's institutional investor clients, including numerous public pension systems and Taft-Hartley funds throughout the United States to ensure their funds have proper safeguards in place to ensure against corporate malfeasance. Similarly, Mr. Broggi consults with institutional investors in the United States and Europe on issues relating to corporate fraud in the U.S. securities markets, as well as corporate governance issues and shareholder litigation. Mr. Broggi has lectured at institutional investor conferences throughout the United States on the value of shareholder activism as a necessary component of preventing corporate fraud abuses, including the Texas Association of Public Employee Retirement Systems, Georgia Association of Public Pension Trustees, Michigan Association of Public Retirement Systems, Illinois Public Pension Fund Association, and the Pennsylvania Association of County Controllers, among others.

Mr. Broggi is admitted to practice in New York and Pennsylvania.

DEBORAH CLARK-WEINTRAUB is a partner in the firm's New York office. Ms. Weintraub graduated from St. John's University, Queens, New York (B.A., *summa cum laude*, 1981; President's Award in recognition of achieving highest GPA among graduates of St. John's College of Liberal Arts and Science) and Hofstra Law School in Hempstead, New York (J.D., with distinction, 1986). While in law school, Ms. Weintraub was a member and research editor of the Hofstra Law Review. Following her graduation from Hofstra Law School, Ms. Weintraub served as a law clerk to the Honorable Jacob Mishler, United States District Judge for the Eastern District of New York (1986-1987). Ms. Weintraub is a member of the New York bar.

Ms. Weintraub has extensive experience in all types of class action litigation. Ms. Weintraub has served as lead counsel for investors in mortgage-backed securities (MBS) in litigation against MBS trustees for failure to pursue repurchase remedies with respect to mortgage loans in MBS trusts that breached representations and warranties. These matters include *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.), which recovered $69 million for investors.

Ms. Weintraub is also currently representing investors in several ongoing securities class action cases including *Weston v. RCS Capital Corporation*, 1:14-cv-10136 (S.D.N.Y.); *ECD Investor Group v. Credit Suisse International*, 14-cv-8484 (S.D.N.Y.); and *In re Conn's, Inc. Sec. Litig.*, No. 4:14-cv-00548 (S.D. Tex.).

Ms. Weintraub has extensive securities class action experience and has acted as plaintiffs' co-lead counsel in numerous cases that have obtained substantial recoveries for defrauded investors. Ms. Weintraub was one of the lead counsel in *In re Oxford Health Plans, Inc. Securities Litigation*, MDL No. 1222 (S.D.N.Y.), in which a cash settlement of $300 million was obtained on the eve of trial after more than five years of litigation. At the time, the $300 million cash recovery was one of the largest recoveries ever achieved in a securities class action. The Honorable Charles L. Brieant, Jr., who presided over this case described it as "perhaps the most heavily defended, ardently pursued defense of a similar case that I can recall." Ms. Weintraub also served plaintiffs' co-lead counsel in *In re CVS Corporation Securities Litigation*, No. 01-11464 (D. Mass.), in which a cash settlement of $110 million was obtained for investors. Following the settlement in March 2006, CVS disclosed that the SEC had opened an inquiry into the manner in which CVS had accounted for a barter transaction, a subject of the class action suit, and that independent counsel to the firm's audit committee had concluded in December 2005 that various aspects of the company's accounting for the transaction were incorrect, leading to the resignations of the company's controller and treasurer.

Ms. Weintraub is the co-author of "Gender Bias and the Treatment of Women as Advocates," Women in Law (1998), and the "Dissenting Introduction" defending the merits of securities class action litigation contained in the 1994 monograph "Securities Class Actions: Abuses and Remedies," published by the National Legal Center for the Public Interest. She is a member of the Association of the Bar of the City of New York.

DARYL F. SCOTT graduated in 1981 from Vanderbilt University with a Bachelor of Arts in Economics. He received his Juris Doctorate from Creighton University School of Law in 1984, and a Masters of Taxation from Georgetown University Law Center in 1986. Mr. Scott is a partner involved in complex securities litigation at Scott+Scott. In addition to his work with the firm, Mr. Scott has specialized in private foundation and ERISA law. He was also formerly an executive officer of a private equity firm that held a majority interest in a number of significant corporations. Mr. Scott is admitted to the Supreme Court of Virginia and a member of the Virginia Bar Association and the Connecticut Bar Association.

DEIRDRE DEVANEY is a graduate of New York University (B.A., *cum laude*, 1990) and the University of Connecticut School of Law (J.D., with honors, 1998) where she was the managing editor of the Connecticut Journal of International Law. Ms. Devaney's experience includes

commercial and probate litigation, as well as trusts and estates. Currently, Ms. Devaney's practice areas include commercial and securities litigation, including: *In re Priceline.com, Inc. Securities Litigation*, among others. Ms. Devaney is admitted to practice in Connecticut, New York, and the United States District Court for the District of Connecticut.

GEOFFREY M. JOHNSON is a partner in the firm's Ohio office. Mr. Johnson's practice focuses on commercial and class action trial work and appeals. His areas of concentration include complex securities litigation, ERISA class actions, and commercial and class action antitrust litigation.

Notably, Mr. Johnson serves as lead counsel in *Pfeil v. State Street Bank and Trust Company*, 2:09-cv-12229 (E.D. Mich.), a case of national significance in the area of employee retirement plans. In the case, Mr. Johnson represents a class of over 200,000 current and former General Motors employees who owned General Motors stock in GM's two main retirement plans. Mr. Johnson successfully argued the case to the United States Court of Appeals for the Sixth Circuit, which issued an opinion that is now looked to nationally as one of the seminal cases in the area of ERISA fiduciary duties and employee rights. *See Pfeil v. State Street Bank and Trust Company*, 671 F.3d 585 (6th Cir. 2012).

Mr. Johnson has also served as lead or co-lead counsel in other major securities and ERISA cases, including: *In re Royal Dutch/Shell ERISA Litigation*, No. 04-1398 (D.N.J.), which settled for $90 million and is one of the three largest recoveries ever obtained in an ERISA class action case; *In re Priceline Securities Litigation*, 00-cv-1884 (D. Conn.), which settled for $80 million and is the largest class action securities settlement ever obtain in the State of Connecticut; and *In re General* Motors *ERISA Litigation*, 05-cv-71085 (E.D. Mich.), a case that settled for $37.5 million and ranks among the largest ERISA class settlements ever obtained.

Mr. Johnson has been active in the firm's mortgage-backed securities litigation practice, serving as lead or co-lead counsel in mortgage-backed securities class action cases involving Washington Mutual (*In re* Washington *Mutual Mortgage Backed Securities Litigation*, 2:09-cv-00037 (W. D. Wash.)) and Countrywide Financial (*Putnam Bank v. Countrywide Financial, Inc.*, No. 10-cv-302 (C.D. Cal.)). Mr. Johnson also helped develop the theories that the firm's pension fund clients have used to pursue class action cases against mortgage-backed security trustees. *See Retirement Board of the Policemen's Annuity & Benefit Fund of the City of Chicago v. Bank of New York Mellon* (Case No. 11-cv-05459 (S.D.N.Y.)); *Oklahoma Police Pension & Retirement System v. U.S. Bank NA* (Case No. 11-cv-8066 (S.D.N.Y.)).

In addition, Mr. Johnson is active in the firm's appellate practice group, where he has handled numerous class action appeals, including appeals in the United States Court of Appeals for the Second Circuit, Third Circuit, Fifth Circuit, Sixth Circuit, Seventh Circuit, and Eleventh Circuit.

Mr. Johnson is a graduate of Grinnell College (B.A., Political Science with Honors, 1996) and the University of Chicago Law School (J.D., with Honors, 1999), where he served on the law review. Prior to joining Scott+Scott, Mr. Johnson clerked for the Honorable Karen Nelson Moore, United States Court of Appeals for the Sixth Circuit.

AMANDA F. LAWRENCE is a partner in the firm's Connecticut office. Ms. Lawrence is a graduate of Dartmouth College (B.A., *cum laude*, 1998) and Yale Law School (J.D., 2002). During law school, Ms. Lawrence worked for large firms in Washington, D.C., New York, and Cleveland. After graduating from Yale, she worked in-house at a tax lien securitization company and for several years at a large Hartford-based law firm.

At Scott+Scott, Ms. Lawrence is actively is engaged in the firm's complex securities, corporate governance, consumer, and antitrust litigation. She has worked on several cases that have resulted in substantial settlements including: *In re Aetna UCR Rates Litigation*, MDL No. 2020 (D.N.J.) ($120 million settlement pending); *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million); *Boilermakers National Annuity Trust Fund v. WaMu Mortgage Pass-Through Certificates*, No. 09-cv-00037 (W.D. Wash.) ($26 million securities class action settlement); and *In re TETRA Technologies, Inc. Securities Litig.,* No. 4:07-cv-00965 (S.D. Tex.) ($8.25 million securities class action settlement).

Ms. Lawrence has taught Trial Practice at the University of Connecticut School of Law and is very actively involved in her community, particularly in recreational organizations and events. A five-time NCAA National Champion cyclist who raced throughout the United States, Europe, Bermuda, and Pakistan, Ms. Lawrence is now an avid endurance athlete. She has competed in dozens of marathons, including the New York Marathon and the Boston Marathon, and in 11 full-distance ironman competitions – three of which were at the Ironman World Championships in Kona, Hawaii. She is licensed to practice in Connecticut and the Southern District of New York.

ERIN GREEN COMITE is a partner in the firm's Connecticut office. Ms. Comite is a graduate of Dartmouth College (B.A., *magna cum laude*, 1994) and the University of Washington School of Law (J.D., 2002). Ms. Comite litigates complex class actions throughout the United States, representing the rights of shareholders, employees, consumers, and other individuals harmed by corporate misrepresentation and malfeasance. Since joining Scott+Scott in 2002, she has litigated such cases as *In re Priceline.com Securities Litigation* ($80 million settlement); *Schnall v. Annuity and Life Re (Holdings) Ltd.* ($27 million settlement); and *In re Qwest Communications International, Inc.* (settlement obtaining $25 million for the company and achieving corporate governance reforms aimed at ensuring board independence). Currently, she is one of the court-appointed lead counsel in *In re Monsanto Company Genetically-Engineered Wheat Litigation*, MDL No. 2473 (D. Kan.), and is prosecuting or has recently prosecuted actions against defendants such as Banco Popular, N.A.; Cargill, Inc.; The Estée Lauder Companies, Inc.; Ferrero USA, Inc.; L'Oreal USA, Inc.; Merisant Company; Merrill, Lynch, Pierce, Fenner & Smith, Inc.; NCO Financial Systems, Inc.; and Nestlé USA, Inc.

While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In *Hohider v. United Parcel Service, Inc.*, Ms. Comite spearheaded a nearly year-long investigation into every facet of UPS's preservation methods, requiring intensive, full-time efforts by a team of attorneys and paralegals well beyond that required in the normal course of pre-trial litigation. Ms. Comite assisted in devising the plan of investigation in weekly conference calls with the Special Master, coordinated the review of over 30,000 documents that uncovered a blatant trail of deception and

prepared dozens of briefs to describe the spoliation and its ramifications on the case to the Special Master. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the Court conditioned the parties' settlement of the three individual ADA case on UPS adopting and implementing preservation practices that passed the approval of the Special Master.

Ms. Comite also is active in the firm's appellate practice. Recent successes include achieving a Ninth Circuit reversal of a district court's dismissal of consumers' claims concerning Nestlé's Juicy Juice Brain Development Beverage, which the plaintiffs alleged was deceptively marketed as having the ability to improve young children's cognitive development with minute quantities of the Omega-3 fatty acid, DHA. *Chavez v. Nestle USA, Inc*., 511 F. App'x 606 (9th Cir. 2013).

Prior to entering law school, Ms. Comite served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.

Ms. Comite's volunteer activities have included assisting immigrant women, as survivors of domestic violence, with temporary residency applications as well as counseling sexual assault survivors. Currently, Ms. Comite supports Connecticut Children's Medical Center and March of Dimes/March for Babies.

Ms. Comite is licensed to practice in the State of Connecticut and is admitted to practice in the U.S. District Court for the District of Connecticut and the Southern District of New York and the U.S. Court of Appeals for the Second, Third, Ninth and Eleventh Circuits.

THOMAS LAUGHLIN is a partner in the firm's New York office. Mr. Laughlin is a graduate of Yale University (B.A. History, *cum laude*, 2001) and New York University School of Law (J.D., *cum laude*, 2005). After graduating from law school, Mr. Laughlin clerked for the Honorable Irma E. Gonzalez, United States District Court Judge for the Southern District of California.

Mr. Laughlin's practice focuses on securities class action, shareholder derivative, ERISA and other complex commercial litigation. While at Scott+Scott, Mr. Laughlin has worked on several cases that have achieved notable victories, including *Cornwell v. Credit Suisse,* No. 08-3758 (S.D.N.Y.) (securities settlement of $70 million), *Rubenstein v. Oilsands Quest Inc.*, No. 11-1288 (S.D.N.Y.) (securities settlement of $10.235 million) *Plymouth County Contributory Ret. Sys. v. Hassan,* No. 08-1022 (D.N.J.) (corporate governance reform); and *Garcia v. Carrion,* No. 09-1507 (D.P.R.) (corporate governance reform). Mr. Laughlin is a member of the New York bar and is admitted to practice in the Southern District of New York and the Eastern District of New York.

Mr. Laughlin also has significant appellate experience, having represented clients in connection with several appellate victories, including *Cottrell v. Duke,* 737 F.3d 1238 (8th Cir. 2013); *Westmoreland County Employee Retir. Sys. v. Parkinson,* 727 F.3d 719 (7th Cir. 2013); *Pfeil v.*

State Street Bank and Trust Co., 671 F.3d 585 (6th Cir. 2012); and *King v. VeriFone Holdings, Inc.*, 12 A.3d 1140 (Del. Supr. 2011).

In 2014, Mr. Laughlin was co-chair of a 13-day bench trial in *Bankers' Bank Northeast v. Berry, Dunn, McNeil & Parker, LLC*, No. 12-cv-00127 (D. Me.). Mr. Laughlin represented a consortium of 10 community banks asserting negligence and professional malpractice claims against the former officers and directors of a bank and its auditor in connection with an $18 million loan made to that bank in September 2008. Among other things, Mr. Laughlin conducted the cross-examination of all three witnesses from the defendant's auditing firm and the direct examination of plaintiff's auditing expert. The parties to the action succeeded in resolving the action after trial.

MAX SCHWARTZ is a partner based in New York. His main practice area is complex civil litigation, with an emphasis on financial products and services. He also counsels investment firms and institutional investors on strategies to enhance returns, or recoup losses, through a variety of legal actions.

Following the financial crisis, Mr. Schwartz served as lead counsel in several cases that set important precedents regarding mortgage-backed securities. He argued the first cases to find that securitization trustees must seek to have defective mortgages repurchased from MBS trusts. These efforts recently led to the recovery of $69 million for investors in Washington Mutual MBS and $6 million for investors in Bear Stearns MBS. *Policemen's Annuity and Benefit Fund of the City of Chicago v. Bank of America, NA*, 1:12-cv-2865 (S.D.N.Y.); *Oklahoma Police Pension and Retirement System v. U.S. Bank National Association*, 1:11-cv-8066 (S.D.N.Y.).

Currently, Mr. Schwartz represents investment firms pursuing claims against MBS servicers. He also represents plaintiffs in a securities action against Nicholas Schorsch and RCS Capital Corp., among others. *Weston v. RCS Capital Corp.*, 1:14-cv-10136 (S.D.N.Y.).

Mr. Schwartz has substantial experience in competition and antitrust matters as well. He was part of the team that secured a $590 million settlement stemming from allegations that several of the largest leveraged buyouts were subject to collusion. *Dahl v. Bain Capital Partners, LLC*, 1:07-cv-12388 (D. Mass.). In addition, Mr. Schwartz has advised clients in antitrust matters ranging from pharmaceuticals to precious metals and has advised companies seeking merger review before a number of regulatory agencies.

Super Lawyers named Mr. Schwartz a Rising Star. The Legal Aid Society also recognized him with a Pro Bono Service Award for work before the New York Court of Appeals.

Mr. Schwartz holds a B.A. from Columbia University (*cum laude*), and a J.D. from New York University School of Law.

DAVID HOWE is a competition, EU and public lawyer, and Senior Counsel at Scott+Scott Europe. He trained at Freshfields Bruckhaus Deringer LLP and, after qualification, spent a further eight years in the competition and dispute resolution teams there.

David has acted for a range of multinational clients on the full spectrum of competition investigations (in both the UK and internationally) litigation and advice. He has conducted competition damages claims in the English High Court, Court of Appeal and Competition Appeal Tribunal, and also appeared in the European Court of Justice. He acted for Roche on its defence of litigation arising out of the Vitamins cartel (including in the Devenish litigation, which ruled on the availability of restitutionary and exemplary damages in follow-on claims) and, for EWS in its defence of claims brought by the administrators of Enron for damage following EWS' abuse of dominance (the first follow-on damages action to go to trial in the Competition Appeal Tribunal). He has published several articles on competition law, including in relation to the new EU Damages Directive.

David also has significant wider expertise, including in bribery, public and regulatory law, and human rights matters. For instance, he was the lead associate co-ordinating a multi-jurisdictional regulatory and public law strategy for a major consumer products company, and has acted on a number of judicial reviews for a range of clients, including (as lead associate) on a significant judicial review of the lawfulness of domestic consumer products legislation, relying primarily on EU free movement and human rights grounds. In addition to "classic" human rights claims, David also has expertise in the evolving body of hard and soft law arising out of the UN "Ruggie Principles" on Business and Human Rights, having assisted a major technology company on a full Ruggie-compliant assessment of, and mitigation strategy for, a new project.

David attended Oxford University. He studied Law and French Law, was appointed a scholar, and graduated in 2003 with First Class Honours (being placed in the top 3% of his year), and a Diploma in French Law from the Universite Pantheon-Assas (Paris II). After a year completing professional qualifications, he returned to Oxford University to study the BCL (Oxford University's LLM equivalent), graduating in 2005 with a Distinction and a university prize, and was subsequently short-listed for the All Souls Prize Fellowship. In the early years of his practice at Freshfields, David also completed an LLM in European Law at Kings College London.

DAVID H. GOLDBERGER is an associate in Scott+Scott's San Diego office. Currently, Mr. Goldberger's practice is focused on antitrust litigation, initial case investigations, and other special projects.

Representative actions include *Kleen Products LLC v. Packaging Corporation of America*, No. 10-cv-5711 (N.D. Ill.), an action challenging price-fixing in the containerboard industry, and *In re Lithium Ion Batteries Antitrust Litig.*, No. 13-md-2420 (N.D. Cal.), an action challenging price-fixing of Li-Ion batteries. Mr. Goldberger has also worked on antitrust cases involving delayed generic drug entry, such as *Mylan Pharmaceuticals Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-cv-3824 (E.D. Pa.) ($8 million settlement) and *In re Prograf Antitrust Litig.*, No. 1:11-md-02242 (D. Mass.).

Previously, Mr. Goldberger was active in Scott+Scott's securities fraud and ERISA practice, including *In re: Priceline.com Securities Litigation*, 03-cv-1884 (D. Conn.) ($80 million settlement), *Alaska Electrical Pension Fund v. Pharmacia Corporation*, No. 03-1519 (D.N.J.) ($164 million settlement), and *In re: General Motors ERISA Litigation*, No. 05-71085 (E.D.

Mich.) (resulting in significant enhancements to retirement plan administration in addition to $37.5 million settlement for plan participants).

Mr. Goldberger was also a member of Scott+Scott's institutional investor relations staff, providing the Firm's many institutional clients with assistance in various matters pertaining to their involvement in complex civil litigations.

Mr. Goldberger is also a frequent contributing author to Market+Litigation, Scott+Scott's monthly client newsletter.

Mr. Goldberger graduated from the University of Colorado (B.A., 1999) and California Western School of Law (J.D., 2002). Mr. Goldberger is admitted to practice by the Supreme Court of the State of California and in all California United States District Courts.

A San Diego native, Mr. Goldberger was a founding member of the Torrey Pines High School "Friends of the Library" and coaches youth sports in his spare time.

THOMAS K. BOARDMAN is an associate in the Scott+Scott's New York office, focusing on antitrust litigation. At his prior firm, Mr. Boardman was a member of the trial team in *In re TFT-LCD (Flat Panel) Antitrust Litigation*. For his work on that case, Mr. Boardman was nominated by Consumer Attorneys of California as a finalist for Consumer Attorney of the Year. Mr. Boardman was also an instrumental part of the lead counsel team in *In re Potash Antitrust Litigation (II)*, a case that featured a unanimous victory before an *en banc* panel of the Seventh Circuit, resulting in one of the most influential antitrust appellate opinions in recent memory. The case ended in $90 million in settlements.

At Scott+Scott, Mr. Boardman represents plaintiff-investors in *In re Foreign Exchange Benchmark Rates Antitrust Litigation* and represents opt-out plaintiffs in *Mag Instrument Inc v. The Goldman Sachs Group Inc*. Mr. Boardman also represents indirect purchaser plaintiffs in *In re Lithium Ion Batteries Antitrust Litigation*.

Mr. Boardman received his Bachelor of Arts degree from Vassar College in 2004, majoring in Political Science and Film Studies. He received his Juris Doctorate from the University of California, Hastings College of the Law in 2009. While at Hastings, Mr. Boardman was a member of the Hastings Science and Technology Law Journal and worked as a research assistant to professors Geoffrey C. Hazard, Jr. and Rory K. Little. Mr. Boardman is a member of the following Bars: California, New York, Ninth Circuit Court of Appeals, Central District of California, Northern District of California, and Southern District of California. He is also a member of the following professional associations: ABA Antitrust Section – Model Jury Instruction Revision Task Force, ABA Antitrust Section – Young Lawyers Division – Litigation Committee, ABA Antitrust Section – Young Lawyers Division – Civil Practice and Procedure Committee, New York State Bar Association – Antitrust Section, Bar Association of San Francisco, and Public Justice Foundation.

Mr. Boardman has co-authored the following articles: "Reverse Engineering Your Antitrust Case: Plan for Trial Even Before You File Your Case," *Antitrust Magazine*, Spring 2014, Vol. 28, No. 2, with Bruce L. Simon; and "Class Action for Health Professionals," chapter from

Advocacy Strategies for Health and Mental Health Professionals, Springer Publishing Co., 2011, with Bruce L. Simon, Stuart L. Lustig, Editor.

Prior to joining Scott+Scott, Mr. Boardman worked at Pearson, Simon & Warshaw, LLP in San Francisco and served as a judicial law clerk to the Hon. Christina Reiss in United States District Court, District of Vermont.

Mr. Boardman enjoys running and regularly does so for charity. He has run several races to fundraise for various causes, including the New York City Marathon (National Multiple Sclerosis Foundation) and the Boston Marathon (Cystic Fibrosis Foundation).

PATRICK McGAHAN is an associate in Scott+Scott's London office. He specialises in competition damages litigation before the English High Court, Competition Appeal Tribunal and the Court of Appeal. He has also acted for clients in a variety of arbitrations (both investment treaty and commercial) and pieces of general commercial litigation. Mr. McGahan is presently representing numerous clients who may have European claims arising from the manipulation of the foreign exchange market.

Prior to joining Scott+Scott, Mr. McGahan spent four years in the London office of Freshfields Bruckhaus Deringer LLP. During this time he acted in many of the leading English competition damages cases, including *National Grid Electricity Transmission Plc v ABB Ltd*. He also acted for numerous clients in competition law investigations, both internal investigations and those brought by the Competition and Markets Authority, the European Commission, and other regulators, including the multi-jurisdictional 'LIBOR' investigations.

Mr. McGahan attended the University of Queensland and graduated in 2010 with a Bachelor of Laws (First Class Honours) and a Bachelor of Arts (Economics/Political Science). He then spent a year as the Associate to His Honour Justice Andrew Greenwood at the Federal Court of Australia. Mr. McGahan has a Postgraduate Diploma in Competition Law from King's College London.

Mr. McGahan is admitted to practice in England and Wales and in Queensland, Australia.

STEPHEN TETI's practice focuses on securities class action litigation, shareholder derivative lawsuits and corporate governance, and complex consumer litigation. While at Scott+Scott, Mr. Teti has worked on several cases that have achieved notable results, including *Rubenstein v. Oilsands Quest Inc.*, No. 11-cv-288 (S.D.N.Y.) (securities settlement of $10.235 million), *Westmoreland County Employee Ret. Sys. v. Parkinson*, No. 10-cv-6514 (N.D. Ill.) (corporate governance reform), and *Plymouth County Contributory Ret. Sys. v. Hassan*, No. 08-cv-1022 (D.N.J.) (corporate governance reform). Mr. Teti also practices in Scott+Scott's appellate group, achieving victories in *Cottrell v. Duke*, 737 F.3d 1238 (8th Cir. 2013), *Westmoreland County Employee Retirement System v. Parkinson*, 737 F.3d 719 (7th Cir. 2013), and *Chavez v. Nestlé USA, Inc.*, 511 Fed. Appx. 606 (9th Cir. 2013).

Recently, Mr. Teti helped defeat a motion to dismiss a securities fraud action in which he serves as co-lead counsel, in *Gross v. GFI Group, Inc.*, 2016 WL 719434 (S.D.N.Y. Feb. 9, 2016). Mr.

Teti represents a class of shareholders who sold their stock in reliance on GFI's assurances that it had obtained the best possible price for its shareholders in a merger acquisition, despite knowing that this was false. After a bidding war ensued, GFI received significantly more than it had previously assured investors was the top price it could get for the company.

Mr. Teti obtained a significant decision for consumers in *Friedman v. Maspeth Fed. Loan & Savings Ass'n*, 30 F. Supp. 3d 183 (E.D.N.Y. 2014). In a case before the Honorable Jack B. Weinstein, raising "issues of first impression on the reach of the Real Estate Settlement Procedures Act," Mr. Teti defeated a motion to dismiss, and later obtained a settlement that reimbursed consumers for 100% of their losses in the case which involved wrongful imposition of late charges on timely received mortgage payments.

Mr. Teti has also achieved several favorable decisions regarding the improper removal of class actions under the Securities Act of 1933, including *Niitsoo v. Alpha Natural Resources, Inc.*, 902 F. Supp. 2d 797 (S.D. W. Va. 2012), *Rosenberg v. Cliffs Natural Resources, Inc.*, 2015 WL 1534033 (N.D. Ohio Mar. 25, 2015), and *Rajasekaran v. CytRx Corp.*, 2014 WL 4330787 (C.D. Cal. Aug. 21, 2014).

Mr. Teti also litigates complex consumer cases, including in the emerging field of data breach litigation. He represents banks and other financial institutions in *In re: Home Depot Inc. Customer Data Security Breach Litig.*, 14-md-2583 (N.D. Ga.), where he serves on the Plaintiffs' Coordination & Discovery Committee, as well as in *In re: Target Corp. Customer Data Security Breach Litig.*, 14-md-2522 (D. Minn), and *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-2228 (N.D. Ill.).

Mr. Teti graduated from Fairfield University (B.A., *cum laude*, 2007) and the Quinnipiac University School of Law (J.D., *magna cum laude*, 2010). He is a member of the Connecticut Bar. During law school, Mr. Teti served as Publications Editor on the *Quinnipiac Law Review*. Further, he worked as an intern in the State of Connecticut Office of the Attorney General, a judicial extern to the Honorable Stefan R. Underhill in the United States District Court for the District of Connecticut, and a legislative extern to the Judiciary Committee of the Connecticut General Assembly. Prior to joining Scott+Scott, Mr. Teti clerked for the judges of the Connecticut Superior Court.

Mr. Teti is a regular contributor to and editor of Scott+Scott's monthly newsletter, MARKET+LITIGATION, and he volunteers on his local Youth Services Advisory Board.

JOHN JASNOCH's practice areas include securities and antitrust class actions, shareholder derivative actions, and other complex litigation. Mr. Jasnoch represented plaintiffs in *In re Washington Mutual Mortgage-Backed Securities Litigation,* Case No. 2:09-cv-00037 (W.D. Washington), a case that was litigated through summary judgment and settled on the eve of trial for $26 million. Mr. Jasnoch was also one of the lead attorneys that secured a $7.68 million settlement in *In re Pacific Biosciences Securities Litigation,* Case No. CIV509210 (San Mateo County, California). Other cases Mr. Jasnoch has worked on that have achieved notable results include: *West Palm Beach Police Pension Fund v. Cardionet, Inc.*, Case No. 37-2010-00086836-CU-SL-CTL (San Diego County, California) ($7.25 million settlement), *Hodges v.*

Akeena Solar, 09-cv-2147 (N.D. Cal.) ($4.77 million settlement), *Plymouth County Contributory Ret. Sys. v. Hassan*, No. 08-1022 (D.N.J.) (corporate governance reform), and *In re HQ Sustainable Maritime Industries, Inc., Derivative Litigation*, Case No. 11-2-16742-9 (King County, Washington) ($2.75 million settlement).

Mr. Jasnoch is also involved in the firm's healthcare practice group, currently representing institutional investors in *In re DaVita Healthcare Partners, Inc. Derivative Litigation,* Case No. 12-cv-2074 (D. Co.) and *City of Omaha Police and Fire Pension Fund v. LHC Group*, Case No. 12-cv-1609 (W.D. La.).

As an active member of the Consumer Attorneys of California, Mr. Jasnoch has prepared and submitted successful *amicus curie* briefs to the Ninth Circuit Court of Appeals, including on California's Anti-SLAPP law and consumer protection issues.

Mr. Jasnoch graduated *cum laude* from Creighton University with a Bachelor of Arts in Political Science in 2007. He received his Juris Doctorate from The University of Nebraska College of Law in 2011 and is a member of the California Bar.

MICHAEL G. BURNETT is a graduate of Creighton University (B.A., 1981) and Creighton University School of Law (J.D., 1984). Mr. Burnett practices complex securities litigation at the firm where he consults with the firm's institutional clients on corporate fraud in the securities markets as well as corporate governance issues. In addition to his work with the firm, Mr. Burnett has specialized in intellectual property and related law. Mr. Burnett is admitted to the Nebraska Supreme Court and United States District Court, District of Nebraska. He is a member of the Nebraska Bar Association.

J. ALEX VARGAS serves as Scott+Scott's Director of Investigations. He has devoted over a decade of his career investigating claims on behalf of institutional investors and other stakeholders. At Scott+Scott, Mr. Vargas conducts and oversees investigations across all practice groups. Prior to joining the firm, Mr. Vargas was involved in several high-profile securities fraud cases, including one where he served as the principal investigator in connection with a 14-year litigation, resulting in the largest securities fraud settlement following a trial; a record $1.575 billion recovery in *Jaffe v. Household Int'l, Inc.*, No. 02-C-05893 (N.D. Ill.).

Representative securities fraud matters include: *Ret. Bd. of the Policemen's Annuity and Benefit Fund of Chicago v. FXCM Inc.*, 1:15-cv-03599-KMW (S.D.N.Y.); *Union Asset Management Holding AG v. SanDisk LLC*, 3:15-cv-01455-VC (N.D. Cal.); *In re LendingClub Corp. Shareholder Litig.*, Case No. CIV537300 (Cal. Super. Ct., San Mateo County); *In re MobileIron, Inc. S'holder Litig.*, 1-15-cv-284001 (Cal. Super. Ct., Santa Clara County); *In re Endochoice Holdings, Inc. Sec. Litig.*, C.A. No. 2016 cv 277772 (Ga. Super. Ct. Fulton County); and *Rubenstein v. Oilsands Quest Inc.*, No. 11-cv-288 (S.D.N.Y.) (settlement of $10.235 million).

Representative consumer class actions *include In re Pacific Coast Oil Trust Sec. Lit.*, BC550418 (Cal. Sup. Ct., Los Angeles County); *Greater Chautauqua Federal Credit Union v. Kmart Corp.*, No. 15-cv-2228 (N.D. Ill.); *WinSouth Credit Union v. MAPCO Express, Inc.*, No. 14-cv-1573 (M.D. Tenn.); *Selco Community Credit Union v. Noodles & Co.*, C.A. No. 1:16-cv-2247 (D.

Colo.); *Le v. Kohl's Corp.*, C.A. No. 15-1171 (E.D. Wisc.); and *First Choice Fed. Credit Union v. The Wendy's Co.*, 2:16-cv-00506 (W.D. Pa.).

Mr. Vargas graduated from the University of San Diego (B.A., 1997) and the University of San Diego School of Law (J.D., 2004). He is admitted to practice in New York, California, and the District of Columbia.

ANDREA FARAH's practice focuses on securities, shareholder derivative actions, consumer rights, and other complex litigation. Ms. Farah graduated *summa cum laude* from the University of North Florida with a Bachelor of Arts in Psychology in 2009. She received her Juris Doctorate, *cum laude*, in 2013 and a Master in Business Administration in 2013 from Quinnipiac University School of Law. During law school, Ms. Farah worked as an intern in the Connecticut State's Attorneys Office for the Judicial District of New Haven, Connecticut. Ms. Farah is admitted to practice in New York.

STEPHANIE HACKETT is an associate in Scott+Scott's San Diego office. She primarily practices in the area of antitrust litigation on behalf of classes and individual plaintiffs.

Ms. Hackett has represented class plaintiffs in *Dahl v. Bain Capital Partners, LLC, No. 1:07-cv-12388 (D. Mass.)* ($590.5 million settlement) and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 12-3824 (E.D. Pa.) ($8 million settlement). She represented corporate opt-out clients in *In re Polychloroprene Rubber (CR) Antitrust Litigation*, MDL No. 1642 (D. Conn.); and *In re Plastics Additives (No. II) Antitrust Litigation*, MDL No. 1684 (E.D. Pa.).

Ms. Hackett's current cases include representing class plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), an action challenging collusion regarding foreign exchange rates, and *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), an action challenging collusion regarding the setting of the ISDAfix benchmark interest rate. Ms. Hackett also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y.), a case challenging collusion regarding the spot metal price of physically-delivered aluminum.

As a part of her *pro bono* work, Ms. Hackett has worked with the San Diego Volunteer Lawyer Program, providing assistance to immigrant victims of domestic violence, and the ABA Immigration Justice Project, where she obtained a grant of asylum on behalf of her client.

Ms. Hackett is an active member of the American Bar Association's Antitrust Section and the San Diego La Raza Lawyers Association. She is also a contributing author to Market+Litigation, Scott+Scott's monthly newsletter.

Ms. Hackett is a graduate of the University of Iowa (B.S. Political Science, International Business Certificate, 2001) and of the University of Iowa College of Law (J.D., with distinction, 2005), where she was a recipient of the Willard L. Boyd Public Service Distinction award. While obtaining her law degree, Ms. Hackett worked as a judicial extern for the Honorable Celeste F. Bremer, United States District Court for the Southern District of Iowa. Ms. Hackett is admitted to practice in California.

In addition to her legal education, Ms. Hackett has engaged in accounting study and passed all four parts of the CPA exam. This background has proved particularly useful in cases involving the financial services industry.

JENNIFER J. SCOTT is an associate in Scott+Scott's San Diego office. Her practice focuses on prosecuting antitrust actions.

Ms. Scott represents pension funds and individual investors in *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass), an antitrust action alleging collusion in the buyouts of large publicly traded companies by private equity firms. The defendants in *Dahl* settled for $590.5 million, pending final approval. Ms. Scott also represents class plaintiffs in *Kleen Products LLC v. International Paper*, No. 1:10-cv-5711 (N.D. Ill.), an action challenging price fixing in the containerboard products industry.

Currently, Ms. Scott represents plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y), challenging foreign-exchange market manipulation by many global financial institutions. Ms. Scott also represents corporate opt-out clients in *In re: Aluminum Warehousing Antitrust Litigation*, MDL No. 2481 (S.D.N.Y), a case challenging collusion regarding the spot metal price of physical-delivered aluminum.

She represented the indirect purchaser class in *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Limited Company*, No. 2:12-cv-03824 (E.D. Pa.), a case challenging monopolistic conduct known as "product hopping" by the defendants. In *Mylan*, Ms. Scott drafted dispositive motions, prepared lead counsel to depose experts and key managing directors, and prepared for trial. The case settled for $8 million.

Ms. Scott is an active member of the American Bar Association's Antitrust Section. She is also a frequent contributing author to Market+Litigation, Scott+Scott's monthly newsletter.

Ms. Scott graduated *cum laude* from San Diego State University with a Bachelor of Arts in Psychology in 2007 and from the University of San Diego School of Law in 2011. At USD School of Law, she was a contributing writer to the *California Regulatory Law Reporter*, a judicial intern at the Equal Employment Opportunity Commission, and in-house intern at the Department of the Navy, Office of General Counsel. Ms. Scott is a member of the California Bar and admitted to practice in all state and federal courts in California.

Ms. Scott serves on the board of a San Diego nonprofit literacy organization focusing on early juvenile intervention and rehabilitation.

HAL CUNNINGHAM is a graduate of Murray State (B.S. Biological Chemistry) and the University of San Diego School of Law. Prior to joining Scott+Scott, Mr. Cunningham was engaged in research and development in the chemical and pharmaceutical industries.

Mr. Cunningham's practice focuses on securities class action, shareholder derivative, and consumer litigation. While at Scott+Scott, Mr. Cunningham has worked on several cases that have achieved notable results, including *In re Washington Mutual Mortgage Backed Securities*

Litigation, No. C09-0037 (W.D. Wash.) (securities settlement of $26 million). Mr. Cunningham is also involved in the Firm's securities lead plaintiff motion practice, having briefed several successful lead plaintiff applications for the firm's institutional and individual clients.

Mr. Cunningham is a regular contributor to and editor of Scott+Scott's monthly newsletter, MARKET+LITIGATION.

Mr. Cunningham is admitted to practice in California.

YIFAN ("KATE") LV is an associate in Scott+Scott's San Diego office. Her practice focuses on prosecuting antitrust actions with an emphasis on intercultural cartels.

Ms. Lv represents plaintiffs in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y), challenging foreign-exchange market manipulation by many global financial institutions. Ms. Lv also represents and advises the Firm's Asian clients.

Ms. Lv graduated from Tianjin University of Commerce, Tianjin, China, with a Dual Bachelors in Law and Economics in 2008, from Peoples University of China, Beijing, China with a Master in Law in June 2010, and from William & Mary School of Law in 2014.

Ms. Lv is bilingual, speaking fluent Chinese and English.

Ms. Lv is a member of the California, New York, and China Bars.

SCOTT JACOBSEN is an associate in Scott+Scott's New York office. Mr. Jacobsen practices in the areas of shareholder derivative actions, securities class action litigation, and other complex litigation.

While at Scott+Scott, Mr. Jacobsen has primarily focused on securities and derivative litigation, including investigation of corporate books and records to evaluate potential claims on behalf of shareholders. Cases include *International Union of Operating Engineers Local No. 478 Pension Fund v. McInerney*, C.A. No. 11901-VCN (Del. Ch. Jan 13, 2016) (derivatively on behalf of Genworth Financial Inc.); *Carlson v. Dipp*, No. 1:15-cv-14032 (D. Mass. Dec. 7, 2015) (securities class action); *Fernicola v. Hugin*, C.A. No. 11748-VCMR (Del. Ch. Nov. 24, 2015) (derivatively on behalf of Celgene Corp.); *Feldman v. Kulas*, C.A. No. 11614-VCG (Del. Ch. Oct. 15, 2015) (derivatively on behalf of Santander Consumer USA Holdings Inc.); *Fortunato v. Akebia Therapeutics, Inc.*, No. 1:15-cv-13501 (D. Mass. Oct. 5, 2015) (securities class action).
Mr. Jacobsen graduated from The George Washington University (B.A. English, *magna cum laude*; M.A., English) and William & Mary Law School (J.D. 2014). During law school, Mr. Jacobsen externed at the American Civil Liberties Union of Virginia and served as a staff member for the William & Mary Bill of Rights Journal.

Mr. Jacobsen is a member of the following professional associations: ABA Business Section and ABA Young Lawyers Division. Mr. Jacobsen is also a regular contributor to Scott+Scott's monthly newsletter. He is admitted to practice in New Jersey, New York, and the United States District Court for the Southern District of New York.

RHIANA SWARTZ is an associate in the firm's New York office. Ms. Swartz graduated *magna cum laude* from Brooklyn Law School in 2006, and received her B.A. from Swarthmore College in 2000. After graduating from law school, Ms. Swartz clerked for the Honorable Joan M. Azrack in the Eastern District of New York.

Ms. Swartz's practice focuses on securities class actions and shareholder derivative actions.

Prior to joining Scott+Scott, Ms. Swartz was Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, Office of Corporation Counsel, where she handled federal cases brought under 42 U.S.C. §1983 from initial receipt of complaint through trial verdict. Ms. Swartz settled more than 80 cases and conducted four federal trials. Ms. Swartz also spent more than four years as an Associate at Sullivan & Cromwell LLP in New York, representing major financial institutions in civil and regulatory matters involving securities, antitrust, corporate governance, and employment law issues.

Ms. Swartz is a member of the New York bar and is admitted to practice in the Southern District of New York, Eastern District of New York, and Second Circuit.

DEVINA SHAH is an associate in Scott+Scott's London office. She specialises in competition damages litigation and complex financial cases before the English High Court, the Competition Appeal Tribunal and the Court of Appeal. She is currently representing clients in relation to claims arising out of the manipulation of the foreign exchange market and in connection with LIBOR investigations. She is also advising on claims concerning the multilateral interchange fees.

Prior to joining Scott+Scott, Devina completed her training contract at the London office of Baker & McKenzie LLP. During this time she acted in a range of high-value, cross-border commercial litigation matters and financial disputes, including preparing for and attending a 10-day jurisdictional trial regarding a tortious conspiracy claim and advising on a claim relating to the sinking of an oil platform. Devina has also advised clients on distressed debt and causes of action that could be brought following Cyprus' bail-in resolution. She has advised governments and state banks on anti-money laundering issues and allegations of corruption. Devina has experience in arbitration, acting in claims concerning the international recognition and enforcement of arbitration awards.

She has marshalled in the Chancery Division of the High Court.

Devina graduated from the University of Cambridge with a Bachelor of Arts in History. She is fluent in Gujarati.

SEAN MASSON is an associate in Scott+Scott's New York office. Mr. Masson's practice focuses on securities class action, shareholder derivative, and other complex commercial litigation. *Super Lawyers* has named Mr. Masson a Rising Star in 2015 and 2016 for his work as a securities class action litigator.

Prior to entering the private sector, Mr. Masson served as an Assistant District Attorney in the Manhattan District Attorney's Office. While there, Mr. Masson successfully argued over 40 appeals in state and federal courts and gained extensive experience with large-scale government and regulatory investigations. Notable cases include: *People v. McKelvey* (upheld 75-year sentence for serial rapist preying on homeless women); *People v. Doyle* (affirming conviction for notorious fine art thief); and *People v. Wong* (affirming conviction of driving school instructor involved in hit and run of a child).

Mr. Masson graduated from Queens College (*summa cum laude*) and Hofstra University School of Law (*cum laude*). During law school, Mr. Masson served as the Senior Notes and Comments Editor of the *Hofstra Law Review* and won various awards during Moot Court competitions. Mr. Masson's publications include:

The Presidential Right of Publicity, 2010 Boston College Intellectual Property & Technology Forum 012001.

Note, *Cracking Open the Golden Door: Revisiting U.S. Asylum Law's Response To China's One-Child Policy*, 37 Hofstra Law Review 1135 (2009).

CAREY ALEXANDER is an associate in Scott+Scott's New York office where he focuses on complex consumer litigation and class actions.

Mr. Alexander received his B.A. from Skidmore College in 2004, and graduated *magna cum laude* from St. John's University School of Law in 2012. During law school, Mr. Alexander served as Associate Managing Editor of the *St. John's Law Review*. His student note, *Abusive: Dodd–Frank Section 1031 and the Continuing Struggle To Protect Consumers*, 85 St. John's L. Rev. 1105 (2012), has been cited in several legal journals, including the *Harvard Law Review*.

Prior to law school, Mr. Alexander served as an editor of the consumer-advocacy blog, *Consumerist.com*. He also served as an advisor to the Bronx Borough President and worked as part of the National Campaign to Restore Civil Rights.

Mr. Alexander is admitted to practice in the State of New York and in several federal courts, including New York's Southern, Eastern, and Western Districts, the Northern District of Illinois, and Court of Appeals for the Ninth Circuit.

KASSANDRA NELSON is an associate in the firm's New York office where she focuses on securities and antitrust litigation.

Ms. Nelson is a graduate of the University of Alabama (B.A., *cum laude* 2012) and Southern Methodist University (J.D., 2016). During law school, Ms. Nelson volunteered over 450+ hours in Legal Public Service and received the distinction of Pro Bono Honor Roll upon graduation. She worked as an intern for the Domestic Violence Division at the Dallas County District Attorney's Office as well as an extern for the Honorable Judge Martin Hoffman. Ms. Nelson served as a student attorney for SMU's Innocence Clinic, working with the Dallas County Public

Defender's Office and New York Innocence Project, and successfully advocated for the release and exoneration of Steven Chaney, freed after wrongfully serving more than 25 years.

Ms. Nelson is admitted to practice in the State of Texas.

G. DUSTIN FOSTER's main practice areas include antitrust, securities, and complex litigation, which includes such cases as *In Re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 13-cv-7789 (S.D.N.Y.), *Dahl v. Bain Capital Partners, LLC*, No. 1:07-cv-12388 (D. Mass.), and *Mylan Pharmaceuticals, Inc. v. Warner Chilcott Public Ltd. Co.*, No. 2:12-cv-03824 (E.D. Pa.). Mr. Foster is a member of the West Virginia State Bar.

Mr. Foster is a graduate of West Virginia Wesleyan College (B.S., Biology, *cum laude*, 1999) and of the West Virginia University College of Law (J.D., 2002), where he earned a position on the Moot Court Board and Lugar Trial Association. During law school, Mr. Foster served as a law clerk for the West Virginia Supreme Court of Appeals, after which he assumed a full-time term position as a law clerk for the Hon. Thomas C. Evans, III, of the Fifth Circuit Court of West Virginia.

JOSEPH A. PETTIGREW's practice areas include securities, antitrust, shareholder derivative litigation, and other complex litigation, including work on the following cases: *Dahl v. Bain Capital Partners, LLC*, No. 07-cv-12388 (D. Mass.); *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*, MDL 1720 (E.D.N.Y); and *Marvin H. Maurras Revocable Trust v. Bronfman*, 12-cv-3395 (N.D. Ill.).

Mr. Pettigrew graduated from Carleton College (B.A., Art History, *cum laude*, 1998) and from the University of San Diego School of Law (J.D., 2004). Mr. Pettigrew has served on the board and as legal counsel to several nonprofit arts organizations.

Mr. Pettigrew is admitted to practice in California.

SHAFEEQ ABDUL-WADUD is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Shafeeq received his B.A. in English from the University of Illinois at Urbana-Champaign and graduated from DePaul University College of Law.

Shafeeq is admitted to practice in the State of California and the District of Columbia and in several federal courts, including the United States Tax Court and the U.S. District Court for the Southern District of California.

JUSTUS BENJAMIN is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Justus received his B.A. from Washington University in St. Louis, and graduated from Hofstra School of Law in Hempstead, NY.

Justus Benjamin is admitted to practice in the State of California, including the United States District Court for the Southern District of California.

JACEY BOGLER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Jacey graduated, *cum laude*, from Iowa State University with a Bachelor of Arts degree in Psychology and Criminal Justice (minor) in 2010. She graduated with *honors* from Drake University Law School in 2014. While at Drake, Jacey was a junior staff and editorial board member of the Drake Law Review.

Jacey is admitted to practice in the State of Iowa.

JIM BUCHE is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Jim received his B.A. from Southwestern University in Georgetown, Texas, and graduated from Texas Tech School of Law in 2002.

Jim is admitted to practice in the States of Texas and California and in several federal courts, including the U.S. District Court for the Southern District of California.

VICTORIA BURKE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Victoria received her B.A. from Arizona State University in 1997, and graduated from Southwestern Law School in 2011. Additionally, in 2014, Victoria attained a certificate of completion from Loyola Law School's Fashion Law Summer Intensive program.

On behalf of the American Bar Association, Victoria serves as Vice-Chair of the Trademark Transactions Committee, Chair of the Fashion Law Subcommittee, and former Vice-Chair of the Trademark Litigation Committee. She also frequently authors law articles on a range of topics for various legal publications, most recently for the Daily Journal in November 2016, "*Blunt Talk About Trademarks in the Marijuana Business*." Victoria has also served as panelist for many programs, such as the ABA's webinar *Runway Ready: Fashion Law Fundamentals* (2016). Victoria has volunteered her time to Bet Tzedek's *Employment Rights Project: Wages and Hour* cases and regularly serves as a moot court judge for Pepperdine University School of Law's Annual National Entertainment Law Moot Court Competition.

Victoria is admitted to practice in the State of California and the District of Columbia, and in several federal courts, including the U.S. District Court for the Central District of California.

ELIZABETH A. CAMPOS is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Campos received her B.A. from the University of Southern California in 1997, and graduated from Thomas Jefferson School of Law in 2001.

Ms. Campos is admitted to practice in the State of California and is registered to practice in front of the U.S. Patent and Trademark Office.

NGA CUNNINGHAM is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Nga received her B.A. from the University of California, San Diego in Political Science with an emphasis on Public Policy, and graduated, *cum laude*, from Thomas Jefferson School of Law in 2005.

Nga is admitted to practice in the State of California and in the U.S. District Court for the Central District of California.

YVONNE FUNK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Yvonne received her B.A. from UCLA in 2001, and graduated from UC Hastings law school in 2007. She is admitted to practice in the State of California.

PETER GRAVIN is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions. Peter received a B.A. degree in Psychology from Wesleyan University in Middletown, Connecticut in 1990, and graduated from American University Washington College of Law, *cum laude*, in Washington, DC in 1996.

Prior to joining Scott+Scott, Peter practiced insurance defense with two small San Diego firms, focusing on defending contractors and design professionals in professional liability and breach of contract matters. Peter has also worked as a financial advisor and as an insurance fraud investigator.

Peter is admitted to practice in the State of California, as well as the U.S. District Courts for Southern and Central California.

CARLY HENEK is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Carly received her B.S. from State University of New York at Albany in Human Biology, and graduated from St. John's School of Law in 2001.

Carly has extensive state and federal court experience litigating against and representing major U.S. and international corporations and individual clients in all phases of the litigation process. Her practice focuses on complex commercial litigation and securities fraud litigation.

Carly is admitted to practice in the State of California and New York, including all federal courts in California and New York.

DENIECE KUWAHARA is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Kuwahara received her B.A. from California State University, Fullerton in 2003, and graduated from the University of Colorado School of Law in 2009.

Ms. Kuwahara is admitted to practice in the State of Colorado.

JING LEVESQUE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Levesque received her B.S. from Columbia University in New York, and graduated from Brooklyn Law School in New York.

Ms. Levesque is admitted to practice in the State of California and in several federal courts, including the United States Patent and Trademark Office.

EMERY M. MCCLENDON is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Emery received his B.A. from Michigan State University's James Madison College in 2002, and graduated from Western Michigan University's Thomas M. Cooley Law School in 2010.

Emery also possesses Master's degrees in Corporate Law & Finance and Intellectual Property from Western Michigan University's Thomas M. Cooley Law School.

Emery is admitted to practice in the State of California and in the U.S. District Court for the Eastern and Western Districts of Michigan.

RANDALL AUBREY PETRIE is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Randall received his B.A. from Hamilton College in 1988, and graduated from George Washington University School of Law in 1992, Dean's Fellow.

Randall is admitted to practice in the States of New York and New Jersey and in U.S. District Court for the Southern District of New York.

MELANIE PORTER is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Melanie graduated from UCLA with a B.A. in Psychology in 2003. She received her J.D. from California Western School of Law in 2006, where she graduated *cum laude* in her concentration.

While at CWSL, Melanie served as President of the Asian Pacific Law Student Association and Hawaiian Law Student Association, as well as Secretary and Chair of Community Relations for the Health Law Society and Co-Chair of the Social and Membership Committee for Phi Alpha Delta.

In 2016 and 2017, Melanie received the Rising Star recognition by Super Lawyers. She is currently a member of the California State Bar, San Diego County Bar Association, Consumer Attorneys of San Diego, and the American Bar Association.

She is admitted to practice in the State of California and the U.S. Southern District of California.

WENDY RYU is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Wendy received her B.A. from the University of Southern California in 1997, and graduated from George Washington University Law School in 2003.

Wendy is admitted to practice in the District of Columbia and in the United States District Court for the District of Puerto Rico.

AMY SIPE is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ms. Sipe received her B.A. and M.A. from the University of Missouri in Communications, and graduated from the University of Missouri School of Law in Kansas City.

Prior to joining Scott+Scott, Ms. Sipe worked as in-house counsel for a highly diversified Fortune 500 corporation and for an Am Law Top 20 Litigation Firm. Most recently, in addition to antitrust litigation and class actions, Ms. Sipe has focused on best practices in the areas of electronic discovery, information governance, compliance, and risk management.

Ms. Sipe is admitted to practice in the State of Kansas and in the U.S. Court of Appeals for the 10th Circuit.

DANIELLE STROUD is an attorney in Scott+Scott's California office where she focuses on complex antitrust and consumer litigation and class actions.

Danielle received her B.A. in from University of Redlands in 2001, and graduated from Chicago-Kent College of Law in 2005.

Before joining Scott+Scott, Danielle practiced as a prosecutor at the San Diego City Attorney's Office.

Danielle is admitted to practice in the State of California.

ROBERT R. VILLANUEVA is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Robert received his B.A. from the University of Nevada, Reno in 2007, and graduated from Western State University College of Law in 2013, where he received a Certificate in Business Law with Distinction.

Robert is admitted to practice in the State of California and in several federal courts, including the U.S. District Court for the Central District of California, the Executive Office for Immigration Review, and before the Trademark Trial and Appeal Board.

In his spare time, Robert enjoys a good cup of coffee and hanging out with his wife, Christina, and newborn daughter, Kailani.

MINGZHAO XU is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Ming received her B.A. from the University of California, Davis in Asian American Studies, and graduated from the University of Iowa, College of Law in 2009. She is also a fiction writer and speaks Cantonese/Mandarin.

Currently, Ms. Xu is admitted to practice in the State of California and the U.S. Southern District of California.

BRANDON ZAPF is an attorney in Scott+Scott's California office where he focuses on complex antitrust litigation and class actions.

Brandon received his B.A. from the University of California, Santa Barbara, in 2002, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007. He received his LL.M. in taxation from the University of San Diego School of Law in 2011.

Brandon is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central District of California.

CAITLIN ZAPF is an attorney in Scott+Scott's California office where she focuses on complex antitrust litigation and class actions.

Caitlin received her B.A. from the University of California, San Diego in 2003, and graduated from the University of San Francisco School of Law, *cum laude*, in 2007.

Caitlin is admitted to practice in the State of California and is admitted in the U.S. District Court for the Central, Eastern, and Northern Districts of California.

EXHIBIT B

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

Scott+Scott Attorneys at Law LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Christopher Burke (P)					8.40			7.30	8.10		89.20				113.00	$900.00	$101,700.00
Joseph P. Guglielmo (P)											2.10				2.10	$875.00	$1,837.50
Walter Noss (P)											4.70				4.70	$825.00	$3,877.50
Daryl F. Scott (P)											1.30				1.30	$900.00	$1,170.00
Thomas Boardman (A)									0.40		13.20				13.60	$575.00	$7,820.00
Sylvia Sokol (P)											1.40				1.40	$825.00	$1,155.00
David Goldberger (A)							73.10								73.10	$350.00	$25,585.00
David Goldberger (A)	1.60								16.50		1.00				19.10	$575.00	$10,982.50
John Jashnoch (A)							30.20								30.20	$350.00	$10,570.00
John Jashnoch (A)	3.00		9.50		8.00			0.10	15.50		186.30				222.40	$575.00	$127,880.00
Hal Cunningham (CA)							1283.10								1283.10	$350.00	$449,085.00
Hal Cunningham (CA)											7.60				7.60	$625.00	$4,750.00
Gary D. Foster (CA)									44.90		33.30				78.20	$400.00	$31,280.00
Jennifer Scott (CA)											4.50				4.50	$400.00	$1,800.00
SUB-TOTAL	**4.60**	**0.00**	**9.50**	**0.00**	**16.40**	**0.00**	**1386.40**	**7.40**	**85.40**	**0.00**	**344.60**	**0.00**	**0.00**	**0.00**	**1854.30**		**$779,492.50**
NON-ATTORNEYS																	
Ellen DeWan (PL)											0.50				0.50	$325.00	$162.50
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.50**	**0.00**	**0.00**	**0.00**	**0.50**		**$162.50**
GRAND TOTAL:	**4.60**	**0.00**	**9.50**	**0.00**	**16.40**	**0.00**	**1386.40**	**7.40**	**85.40**	**0.00**	**345.10**	**0.00**	**0.00**	**0.00**	**1854.80**		**$779,655.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Scott+Scott, Attorneys at Law, LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Christopher M. Burke	6/2013 to 10/2016	775
Christopher M. Burke	11/2016 to 2/2017	900
Daryl F. Scott	6/2016 to 7/2016	675
Joseph P. Guglielmo	6/2013 to 10/2016	710
Joseph P. Guglielmo	11/2016 to 1/2017	875
David Goldberger	7/2014 to 10/2015	500
Gary D. Foster	7/2013 to 10/2016	380
Gary D. Foster	11/2016 to 1/2017	400
Hal Cunningham	6/2014 to 2/2015	550
John Jasnoch	6/2013 to 12/2013	380
John Jasnoch	1/2014 to 10/2016	500
John Jasnoch	11/2016 to 2/2017	575
Jennifer Scott	6/2014 to 9/2015	380
Sylvia Sokol	5/2014 to 7/2014	675
Thomas Boardman	7/2014 to 10/2016	500
Thomas Boardman	11/2016 to 12/2016	575
Walter Noss	6/2013 to 10/2016	675
Walter Noss	11/2016 to 1/2017	825
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Ellen Dewan	2/2014 to 4/2016	325

EXHIBIT D

(REDACTED)

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
7/1/2013	12104	CB	2.30	775.00	9	$1,782.50	Review amended complaint; client issues re products purchased and time period of purchase
7/2/2013	12104	CB	2.30	775.00	8	$1,782.50	Amended complaint edits and client communication
7/5/2013	12104	CB	2.00	775.00	11	$1,550.00	Review complaint; telephone call with client[redacted]
12/6/2013	12104	CB	1.80	775.00	11	$1,395.00	Telephone call with J. Jasnoch re motion to dismiss; review documents re motion to dismiss for purpose of advice to clients
6/13/2013	12104	CB	0.40	775.00	11	$310.00	Confer with JG re discovery status and protocols for purpose of responding to plaintiffs' discovery
6/21/2013	12104	CB	2.50	775.00	11	$1,937.50	Discussion with W. Noss, JF and Eric Fastiff of Lieff Cabraser re clients in various states; reach out to clients
6/24/2013	12104	CB	1.00	775.00	11	$775.00	Respond to request from lead counsel re clients from particular states
6/25/2013	12104	CB	1.30	775.00	11	$1,007.50	Reach out re client issues in response to request from leads; conference with Eric Fastiff of Lieff Cabraser and TJ
6/27/2013	12104	CB	1.50	775.00	11	$1,162.50	Client issues for amended complaint
6/28/2013	12104	CB	2.00	775.00	8	$1,550.00	Amended complaint issues
9/17/2013	12104	CB	5.80	775.00	9	$4,495.00	Read defendants' motions to dismiss for purpose of advising clients
7/12/2013	12104	CB	2.00	775.00	11	$1,550.00	Telephone call with J. Jasnoch re client D. Shawn issues; telephone call with J. Jasnoch re complaint
1/21/2014	12104	CB	0.20	775.00	11	$155.00	Review email from JJa re MTD order for purpose of updating clients
1/23/2014	12104	CB	4.50	775.00	11	$3,487.50	Meeting with clients and co-counsel to discuss motion to dismiss and next steps
7/2/2014	12104	CB	1.00	775.00	11	$775.00	Discussion with J. Jasnoch and T. Boardman prior to updates with plaintiffs[redacted] and for purpose of making sure plaintiff discovery was adequately handled
10/2/2014	12104	CB	0.30	775.00	11	$232.50	Email correspondence with JJa regarding class rep[redacted] and document preservation declaration
2/16/2014	12104	CB	0.30	775.00	11	$232.50	emails with WN and JJ Massachusetts' claim in response to lead counsel's inquiries about notice under statute
2/17/2014	12104	CB	0.20	775.00	11	$155.00	emails with WN re re statutory notice of Massachusetts' claim in response to lead counsel
12/3/2014	12104	CB	1.20	775.00	11	$930.00	Conference with J. Jasnoch and conference with client[redacted]
5/23/2014	12104	CB	0.20	775.00	11	$155.00	Confer with SMS re status for purpose of responding to lead counsel's request
5/27/2014	12104	CB	3.00	775.00	8	$2,325.00	Motion to dismiss issues re Scott+Scott client
5/28/2014	12104	CB	0.10	775.00	11	$77.50	Update from JJasnoch on status of project and coordinate plaintiff documents and communications
8/20/2014	12104	CB	1.50	775.00	11	$1,162.50	Discuss motion to dismiss and plaintiff's work, define discovery issues

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
7/9/2014	12104	CB	1.00	775.00	11	$775.00	Review discovery motion; telephone call with J. Jasnoch with the purpose to respond to discovery directed at client
9/25/2014	12104	CB	0.50	775.00	11	$387.50	Letter to client [redacted]; telephone call with J. Jasnoch and D.R. Scott and D.F. Scott
11/26/2014	12104	CB	2.40	775.00	11	$1,860.00	Review current status of offer with J. Jasnoch and T. Boardman for purpose of responding to clients' discovery and getting back to clients
7/1/2015	12104	CB	1.00	775.00	11	$775.00	Follow up with J. Jasnoch and T. Boardman
7/1/2015	12104	CB	2.10	775.00	11	$1,627.50	Conference with J. Jasnoch re client materials (discovery from IPs); review requests (interrogatories, requests for production and responses)
10/1/2015	12104	CB	0.40	775.00	11	$310.00	Call with J. Jasnoch re class representative issues and client materials for update to clients
1/30/2015	12104	CB	1.10	775.00	11	$852.50	Discussion with J. Jasnoch and T. Boardman re update to clients [redacted]
10/2/2015	12104	CB	1.00	775.00	11	$775.00	Discuss client discovery issues with J. Jasnoch
2/19/2015	12104	CB	2.00	775.00	11	$1,550.00	Update with J. Jasnoch and T. Boardman re discovery and status of case for purpose of dealing with client discovery
2/27/2015	12104	CB	1.10	775.00	11	$852.50	Update with J. Jasnoch and T. Boardman re discovery and status of case for purpose of dealing with client discovery
3/27/2015	12104	CB	1.00	775.00	11	$775.00	Update with J. Jasnoch and T. Boardman re updates to [redacted]
4/14/2015	12104	CB	1.00	775.00	11	$775.00	Review case with T. Boardman and J. Jasnoch for update to clients [redacted]
4/24/2015	12104	CB	3.00	775.00	11	$2,325.00	Preparation for and meet with client (2.1); conference with J. Jasnoch (0.3); discovery response review (0.6)
4/25/2015	12104	CB	1.00	775.00	11	$775.00	Follow up re client issues as requested by lead counsel
5/5/2015	12104	CB	0.20	775.00	11	$155.00	emails with JJ re class rep [redacted]
5/5/2015	12104	CB	1.50	775.00	11	$1,162.50	Follow up re plaintiffs' discovery issues; conference with J. Jasnoch re same
10/5/2015	12104	CB	0.50	775.00	11	$387.50	confer and emails with J. Jasnoch re class rep issues
10/7/2015	12104	CB	1.10	775.00	11	$852.50	Call with counsel, ES, and J. Jasnoch
11/8/2015	12104	CB	0.10	775.00	11	$77.50	email with J. Jasnoch re class rep [redacted]
3/9/2015	12104	CB	1.10	775.00	11	$852.50	Discuss clients and discovery with T. Boardman and J. Jasnoch for client updates for [redacted]
5/9/2015	12104	CB	0.40	775.00	11	$310.00	emails with JJ re [redacted] interrogatory responses
5/9/2015	12104	CB	1.50	775.00	11	$1,162.50	Follow up re plaintiffs' discovery issues; conference with J. Jasnoch re same
10/9/2015	12104	CB	1.20	775.00	11	$930.00	Conference with E. Signaigo and J. Jasnoch re clients, discovery and dismissal

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/14/2015	12104	CB	0.40	775.00	11	$310.00	Emails with J. Jasnoch, J. Scott and D. Foster re Toshiba requests
9/14/2015	12104	CB	1.00	775.00	11	$775.00	Conference with J. Jasnoch re client info
9/15/2015	12104	CB	2.00	775.00	11	$1,550.00	Client discovery issues re product purchase and documentation
8/10/2015	12104	CB	0.90	775.00	11	$697.50	Confer with J. Jasnoch and T. Boardmen re status of [redacted]
5/11/2015	12104	CB	1.00	775.00	11	$775.00	Conference call with JJ and [redacted]
11/13/2015	12104	CB	0.20	775.00	11	$155.00	emails with J. Jasnoch re replacement rep [redacted]
11/20/2015	12104	CB	0.50	775.00	11	$387.50	Conference with J. Jasnoch re [redacted]
11/21/2015	12104	CB	1.00	775.00	11	$775.00	Discuss [redacted] with J. Jasnoch and Demetrius
11/23/2015	12104	CB	0.50	775.00	11	$387.50	Discussion with J. Jasnoch; return S. Williams' call re demands for additional information from client
11/27/2015	12104	CB	3.30	775.00	11	$2,557.50	Work with [redacted] (2.1); telephone call with SW, J. Cochette firm (0.8); talk to J. Jasnoch (0.4)
11/29/2015	12104	CB	1.70	775.00	11	$1,317.50	Telephone call with [redacted] to discuss case; conference with J. Jasnoch
11/12/2015	12104	CB	1.00	775.00	11	$775.00	Discovery issues; [redacted] issues
1/28/2016	12104	CB	0.50	775.00	11	$387.50	Discuss deposition of [redacted] with J. Jasnoch and whether further response is requested
12/2/2016	12104	CB	1.00	900.00	11	$900.00	Update re substitution of [redacted] with J. Jasnoch
2/14/2016	12104	CB	1.40	775.00	11	$1,085.00	Conference with [redacted] re interrogatory responses, protective order, duty to monitor, and election search
2/15/2016	12104	CB	0.70	775.00	11	$542.50	Conference with J. Jasnoch re clients and [redacted]
2/16/2016	12104	CB	0.50	775.00	11	$387.50	Conference with Susman Godfrey and J. Jasnoch re [redacted] deposition
2/18/2016	12104	CB	0.50	775.00	11	$387.50	Conference with Susman Godfrey, J. Jasnoch, and DJ re [redacted] deposition
2/3/2016	12104	CB	0.70	775.00	11	$542.50	Discuss plaintiff deposition and [redacted] deposition with J. Jasnoch
3/13/2016	12104	CB	4.00	775.00	11	$3,100.00	Preparation for deposition and review transcripts
3/14/2016	12104	CB	4.50	775.00	11	$3,487.50	Deposition preparation with J. Jasnoch and client (DD)
3/15/2016	12104	CB	1.10	775.00	11	$852.50	Confer with J. Jasnoch re [redacted] depo
3/15/2016	12104	CB	8.40	775.00	5	$6,510.00	Deposition and preparation

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
3/21/2016	12104	CB	0.50	775.00	11	$387.50	Call to [redacted]; discussion with J. Jasnoch
8/5/2016	12104	CB	2.70	775.00	11	$2,092.50	Class issues with respect to Scott+Scott clients
3/10/2016	12104	CB	1.00	775.00	11	$775.00	[redacted] call with J. Jasnoch and Susman
8/10/2016	12104	CB	1.00	775.00	11	$775.00	Discussion with J. Jasnoch and L. Eccles re [redacted] deposition
2/11/2016	12104	CB	1.20	775.00	11	$930.00	Call with [redacted]
4/11/2016	12104	CB	1.00	775.00	11	$775.00	Case Admin; discussion with JJasnoch and co-counsel
11/15/2016	12104	CB	3.10	900.00	11	$2,790.00	Hearing on motion for class certification; conference with J. Jasnoch; review papers; client issues
11/21/2016	12104	CB	0.10	900.00	11	$90.00	Email correspondence with JJa re LG Chem settlement.
9/12/2016	12104	CB	0.50	775.00	11	$387.50	Update with J. Jasnoch re [redacted] responses and objections to third set of interrogatories
2/10/2017	12104	CB	1.00	900.00	11	$900.00	Settlement update with J. Jasnoch
1/11/2017	12104	CB	0.50	900.00	11	$450.00	Settlement update with J. Jasnoch; discuss clients communications
7/1/2016	12104	DFS	0.30	675.00	11	$202.50	Email correspondence J Jasnoch Sony
7/5/2016	12104	DFS	0.30	675.00	11	$202.50	Conference J. Jasnoch re: case updating and case structure
6/30/2016	12104	DFS	0.40	675.00	11	$270.00	Emails with J. Jasnoch re status of case and settlement with Sony
7/26/2016	12104	DFS	0.30	675.00	11	$202.50	Conference with DRS and CB re: case structure
8/4/2014	12104	DG	3.50	500.00	9	$1,750.00	Begin review of key case docs (Merits Review Doc, Cast of Characters, List of Terms, hot documents list, document review notes) forwarded to me from Jaclyn Verducci in anticipation of doc review work
12/5/2014	12104	DG	1.50	350.00	9	$750.00	Review status of case and ongoing document review. Review list of batches of documents reviewed by Scott & Scott to date.
8/6/2014	12104	DG	2.60	500.00	9	$1,300.00	Continue review of key case docs (Merits Review Doc, Cast of Characters, List of Terms, hot documents list, document review notes) forwarded to me from Jaclyn Verducci in anticipation of doc review work
7/29/2014	12104	DG	1.00	500.00	9	$500.00	Review protective order in case and sign to set up for document review in the case
8/8/2014	12104	DG	3.90	350.00	7	$1,950.00	Begin online document review on catalyst platform; review assigned document batches from "First Level Review: Panasonic English"; Pull hot/good docs for memo
8/13/2014	12104	DG	3.30	350.00	7	$1,650.00	Online document review on catalyst platform; review assigned document batches from "First Level Review: Panasonic English"; Pull hot/good docs for memo
8/14/2014	12104	DG	5.50	350.00	7	$2,750.00	Attend 2 conference calls (2.5) one for new reviews training and one for all reviews; online document review on catalyst platform; review assigned document batches from "First Level Review: Panasonic English" (2.5); Pull hot/good docs for memo (0.5)
8/15/2014	12104	DG	4.20	350.00	7	$2,100.00	Online document review on catalyst platform; review assigned document batches from "First Level Review: Panasonic English"; Pull hot/good docs for memo

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
8/18/2014	12104	DG	4.00	350.00	7	$2,000.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/19/2014	12104	DG	2.50	350.00	7	$1,250.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/21/2014	12104	DG	5.60	350.00	7	$2,800.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/22/2014	12104	DG	4.30	350.00	7	$2,150.00	Continue online review of documents on Catalyst online platform. Pull "Best 20" Docs per Jaclyn Verducci and direct memo on hot docs. Send to Jaclyn.
8/25/2014	12104	DG	3.80	350.00	7	$1,900.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/26/2014	12104	DG	4.30	350.00	7	$2,150.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/27/2014	12104	DG	4.40	350.00	7	$2,200.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/28/2014	12104	DG	3.90	350.00	7	$1,950.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
8/29/2014	12104	DG	4.70	350.00	7	$2,350.00	Complete review of assigned batches of online documents on Catalyst platform. Summarize good/hot docs in memo and send to Jaclyn Verducci.
7/9/2014	12104	DG	1.00	500.00	11	$900.00	Read complaint in anticipation of getting work in the case
9/17/2014	12104	DG	1.60	500.00	1	$800.00	Research status of Discovery disputes and production of future documents for case status
8/11/2014	12104	DG	5.20	350.00	7	$2,600.00	Review first level Panasonic English batch documents; pull hot/good documents for memo
11/11/2014	12104	DG	3.50	350.00	7	$1,750.00	Review "Hot Doc Summary" memos circulated by Verducci citing hot documents found for other defendants by other firms; inform our own review; review doc review progress and any doc summary memos scheduled to date
11/21/2014	12104	DG	5.80	350.00	7	$2,900.00	Triage new document batches for document review and assist with document review for Hal Cunningham
8/12/2014	12104	DG	4.20	350.00	7	$2,100.00	Review first Level Panasonic English batch documents; pull hot/good documents for memo
10/7/2015	12104	DG	4.50	500.00	9	$2,250.00	Complete review of ROG and ROG responses for consistency of objections
9/28/2015	12104	DG	3.40	500.00	9	$1,700.00	Review of ROG and ROG responses for consistency of objections
2/14/2014	12104	ED	0.50	325.00	11	$162.50	Proofread and final letter re discovery plan
7/1/2013	12104	GDF	2.60	380.00	11	$988.00	Review stipulated protective order (0.2); consult with client re protective order (0.5); travel to and from to have client execute acknowledgment of protective order (1.9)
9/24/2014	12104	GDF	0.40	380.00	11	$152.00	Email correspondence with JJa and J. Scott regarding client document preservation declarations.
10/2/2015	12104	GDF	0.30	380.00	11	$114.00	emails with J. Jasnoch re class representative [redacted]
11/3/2015	12104	GDF	2.80	380.00	9	$1,064.00	Reading plaintiff [redacted] deposition for accuracy
5/5/2015	12104	GDF	0.20	380.00	11	$76.00	email from JJ regarding class rep [redacted] discovery responses

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/9/2015	12104	GDF	0.20	380.00	11	$76.00	Emails re deposition of [redacted]
9/14/2015	12104	GDF	0.10	380.00	11	$38.00	Email with J. Jasnoch re [redacted] deposition
9/14/2015	12104	GDF	0.40	380.00	11	$152.00	Emails with C. Burke, J. Scott and J. Jasnoch re Toshiba requests
9/21/2015	12104	GDF	0.20	380.00	11	$76.00	Emails re [redacted] deposition
9/22/2015	12104	GDF	1.80	380.00	11	$684.00	Conference call with client [redacted]; drove to and met with client [redacted] regarding Toshiba RFPs; prepared summary of meeting with [redacted]
9/28/2015	12104	GDF	0.20	380.00	11	$76.00	Call with J. Jasnoch re [redacted] deposition
5/10/2015	12104	GDF	0.40	380.00	11	$152.00	Emails with JJasnoch re [redacted] responses
9/10/2015	12104	GDF	0.10	380.00	11	$38.00	Emails re [redacted] depositions
10/20/2015	12104	GDF	4.50	380.00	11	$1,710.00	Correspondence with co-counsel; reading pleadings and MTDs in preparation for deposition of plaintiff [redacted]
10/21/2015	12104	GDF	8.10	380.00	9	$3,078.00	Reading pleadings, MTDs and discovery responses in preparation for deposition of plaintiff [redacted] (0.5); meet plaintiff [redacted] for deposition preparation (5.5); driving to/from meeting with plaintiff [redacted] (2.1)
10/22/2015	12104	GDF	3.70	380.00	9	$1,406.00	Reading depositions and pleadings in preparation for deposition of plaintiff [redacted] start preparing deposition outline
10/23/2015	12104	GDF	5.90	380.00	9	$2,242.00	Reading depositions in preparation for deposition of plaintiff [redacted] (0.8); preparing deposition outline (1.5); compiling documents to be reviewed for deposition (3.6)
10/25/2015	12104	GDF	4.40	380.00	9	$1,672.00	Preparing deposition preparation outline; reviewing documents and proceedings for deposition preparation
10/26/2015	12104	GDF	8.60	380.00	9	$3,268.00	Preparing deposition preparation outline (1.1); compiling documents to provide to plaintiff [redacted] (1.7); teleconference with co-counsel and meeting with plaintiff [redacted] to prepare for deposition (5.4); research regarding how bankruptcy affects ability to be class representative (0.4)
10/27/2015	12104	GDF	3.20	380.00	9	$1,216.00	Reviewing documents for deposition preparation (1.5); [redacted] (1.7)
10/28/2015	12104	GDF	8.50	380.00	11	$3,230.00	Preparation for deposition of plaintiff (2.5); deposition of plaintiff [redacted] (6.0)
3/1/2016	12104	GDF	0.50	380.00	11	$190.00	Correspondence with client regarding deposition; skimming deposition for errors
1/13/2016	12104	GDF	3.80	380.00	11	$1,444.00	Traveled to meet with client [redacted] (.07); reviewed supplemental responses to defendants interrogatories with client (2.5); [redacted] (0.6)
3/2/2016	12104	GDF	1.20	380.00	11	$456.00	Driving to and from meeting client regarding deposition transcript and errata sheet (0.5); discussion with client regarding deposition and errata (0.7)
3/13/2016	12104	GDF	2.50	380.00	11	$950.00	Read and reviewed amended responses for production of documents (0.3); drove to/from meeting with client to discuss amended responses for production of documents (0.7); meeting with client regarding amended responses for production of documents (1.5)
3/31/2016	12104	GDF	0.50	380.00	11	$190.00	Correspondence with co-counsel and client [redacted] to discuss production of documents, remote session to search computer and to set up a meeting for the production
4/5/2016	12104	GDF	1.00	380.00	11	$380.00	Confence call re document collections
4/6/2016	12104	GDF	4.00	380.00	9	$1,520.00	Reading and reviewing documents for meeting with client and co-counsel regarding discovery (0.8); meeting and teleconference with client, co-counsel and tech specialist for remote documents collection (0.9); responding to interrogatories and responding to requests for production od documents (1.4); correspondence with co-counsel and litigation team regarding

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
3/8/2016	12104	GDF	0.40	380.00	11	$152.00	Teleconference with plaintiff to discuss supplemental interrogatories and errata sheet for deposition
3/9/2016	12104	GDF	1.20	380.00	11	$456.00	Drove to/from and meeting with plaintiff to discuss supplemental interrogatories and to obtain her verification and errata sheet
4/11/2016	12104	GDF	0.50	380.00	11	$190.00	Correspondence with litigation team and client regarding objections and responses to defendants 3rd interrogatories (0.2); reading defendants 3rd interrogatories (0.3)
11/21/2016	12104	GDF	0.10	400.00	11	$40.00	Email correspondence with JJa re [redacted] approval of settlement.
11/23/2016	12104	GDF	0.10	400.00	11	$40.00	Email correspondence with JJa re [redacted] approval of settlement.
11/27/2016	12104	GDF	1.10	400.00	9	$440.00	Read and review settlement agreement to discuss with [redacted]; traveled to/from meeting with Linda Lincoln to discuss settlement agreement
1/12/2016	12104	GDF	1.90	380.00	9	$722.00	Read and reviewed supplemental responses to defendants interrogatories (1.2); contacted client [redacted] to discuss the supplemental responses (0.7)
4/12/2016	12104	GDF	1.60	380.00	11	$608.00	Met with client to go over responses and objections to defendants third set of interrogatories (1.0); driving to and from meeting with client regarding interrogatories (0.6)
1/6/2017	12104	GDF	1.20	400.00	9	$480.00	Reading and reviewing settlement agreement with NEC; call with client regarding settlement; meeting with client regarding settlement
7/1/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/1/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
10/1/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Sony English" production for relevant documents. Custodian Takanao Matsumoto
12/1/2014	12104	HC	4.00	350.00	7	$1,400.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
12/1/2014	12104	HC	6.20	350.00	7	$2,170.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
7/2/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
9/2/2014	12104	HC	6.80	350.00	7	$2,380.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
10/2/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
12/2/2014	12104	HC	1.00	350.00	11	$350.00	Conference call re: document production and coding issues.
12/2/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
7/3/2014	12104	HC	0.40	350.00	7	$140.00	Lithium Battery 12104 - Review 7/1/2014 meeting notes, updates to document review protocol, and batch memo template
7/3/2014	12104	HC	8.00	350.00	7	$2,800.00	Lithium Battery 12104 - Prepare updated cast of characters identifying key Panasonic personnel

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/3/2014	12104	HC	6.10	350.00	7	$2,135.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
10/3/2014	12104	HC	7.80	350.00	7	$2,730.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
11/3/2014	12104	HC	3.50	350.00	7	$1,225.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/3/2014	12104	HC	6.20	350.00	7	$2,170.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
12/3/2014	12104	HC	9.00	350.00	7	$3,150.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
8/4/2014	12104	HC	2.30	350.00	7	$805.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/4/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/4/2014	12104	HC	7.30	350.00	7	$2,555.00	Draft batch memorandum (6/25/2014 through 8/29/14)
11/4/2014	12104	HC	0.90	350.00	7	$315.00	Document review and coding conference call.
11/4/2014	12104	HC	8.30	350.00	7	$2,905.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
12/4/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
8/5/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/5/2014	12104	HC	7.20	350.00	7	$2,520.00	Draft batch memorandum (6/25/2014 through 8/29/2014)
11/5/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
12/5/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
7/6/2014	12104	HC	6.50	350.00	7	$2,275.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/6/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/6/2014	12104	HC	4.70	350.00	11	$1,645.00	Update cast of characters from top documents (6/25/14 through 8/29/2014)
10/6/2014	12104	HC	2.60	350.00	7	$910.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
11/6/2014	12104	HC	9.00	350.00	7	$3,150.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
6/13/2014	12104	HC	4.50	350.00	7	$1,575.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/16/2014	12104	HC	6.30	350.00	7	$2,205.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/17/2014	12104	HC	2.30	350.00	7	$805.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
6/18/2014	12104	HC	6.40	350.00	7	$2,240.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/19/2014	12104	HC	5.40	350.00	7	$1,890.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/20/2014	12104	HC	4.00	350.00	7	$1,400.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
6/21/2014	12104	HC	2.50	350.00	7	$875.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
6/23/2014	12104	HC	1.50	350.00	7	$525.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/23/2014	12104	HC	6.50	350.00	7	$2,275.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
6/24/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
6/25/2014	12104	HC	7.00	350.00	7	$2,450.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/26/2014	12104	HC	1.90	350.00	11	$665.00	Prepare updated cast of characters identifying key Panasonic personnel
6/26/2014	12104	HC	6.80	350.00	7	$2,380.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/27/2014	12104	HC	5.20	350.00	7	$1,820.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/29/2014	12104	HC	2.90	350.00	7	$1,015.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
6/30/2014	12104	HC	2.50	350.00	7	$875.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
6/30/2014	12104	HC	6.20	350.00	7	$2,170.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/7/2014	12104	HC	2.60	350.00	7	$910.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman, Shauna Peterson
7/7/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/7/2014	12104	HC	7.00	350.00	7	$2,450.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
10/7/2014	12104	HC	8.70	350.00	7	$3,045.00	Review "Sony English" production for relevant documents, Custodian: Joe DeCarlo
11/7/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Sony English" production for relevant documents, Custodian: Joe DeCarlo
7/14/2014	12104	HC	3.20	350.00	7	$1,120.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman
7/14/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/15/2014	12104	HC	6.90	350.00	7	$2,415.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/16/2014	12104	HC	8.40	350.00	7	$2,940.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
7/17/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/18/2014	12104	HC	5.70	350.00	7	$1,995.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/20/2014	12104	HC	2.90	350.00	7	$1,015.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/21/2014	12104	HC	3.00	350.00	7	$1,050.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman
7/21/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/22/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/23/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/24/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/25/2014	12104	HC	6.10	350.00	7	$2,135.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/28/2014	12104	HC	2.50	350.00	7	$875.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Ty Bowman
7/28/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/29/2014	12104	HC	8.60	350.00	7	$3,010.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
7/30/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
7/31/2014	12104	HC	8.80	350.00	7	$3,080.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
7/8/2014	12104	HC	7.70	350.00	7	$2,695.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/8/2014	12104	HC	9.10	350.00	7	$3,185.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/8/2014	12104	HC	3.40	350.00	7	$1,190.00	Assemble memorandum on most relevant documents, 8/18/2014 - 8/29/2014
10/8/2014	12104	HC	7.60	350.00	7	$2,660.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
12/8/2014	12104	HC	3.00	350.00	7	$1,050.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
12/8/2014	12104	HC	7.20	350.00	7	$2,520.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/13/2014	12104	HC	6.30	350.00	7	$2,205.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/14/2014	12104	HC	1.00	350.00	7	$350.00	Conference call with reviewer group.
8/14/2014	12104	HC	1.50	350.00	7	$525.00	Review updated reference materials.

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
8/14/2014	12104	HC	6.30	350.00	7	$2,205.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey, Tim Hamlin
8/15/2014	12104	HC	7.20	350.00	7	$2,520.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/18/2014	12104	HC	3.40	350.00	7	$1,190.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey, Steve Hamlin
8/18/2014	12104	HC	6.10	350.00	7	$2,135.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/19/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/20/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/21/2014	12104	HC	7.70	350.00	7	$2,695.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/22/2014	12104	HC	2.80	350.00	7	$980.00	Assemble memorandum on most Panasonic-English hot documents
8/22/2014	12104	HC	5.60	350.00	7	$1,960.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/25/2014	12104	HC	3.10	350.00	7	$1,085.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/25/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey, Tom Hamlin
8/26/2014	12104	HC	8.30	350.00	7	$2,905.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/27/2014	12104	HC	8.30	350.00	7	$2,905.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/28/2014	12104	HC	8.60	350.00	7	$3,010.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/29/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
8/31/2014	12104	HC	3.60	350.00	7	$1,260.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
7/9/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/9/2014	12104	HC	5.00	350.00	7	$1,750.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
9/9/2014	12104	HC	4.30	350.00	7	$1,505.00	Review relevant documents to date; determine documents relevant to time frame/subject matter of 7/25/2005 - 7/26/2006 meetings between Sanyo/LG/MBI (SJLGCBAT_ DOJ 000001)
10/9/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
12/9/2014	12104	HC	1.00	350.00	7	$350.00	Conference call re document production and coding issues.
12/9/2014	12104	HC	8.30	350.00	7	$2,905.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
9/17/2014	12104	HC	2.20	350.00	7	$770.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/18/2014	12104	HC	7.30	350.00	7	$2,555.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/19/2014	12104	HC	3.80	350.00	7	$1,330.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/21/2014	12104	HC	4.30	350.00	7	$1,505.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/22/2014	12104	HC	2.80	350.00	7	$980.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Steve Hamlin, Shauna Petersen
9/22/2014	12104	HC	6.40	350.00	7	$2,240.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/23/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/24/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/25/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/26/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/29/2014	12104	HC	1.50	350.00	7	$525.00	Review "Panasonic English" production for relevant documents, Batch #1_0002; Custodian: Barbara Lahey
9/30/2014	12104	HC	0.70	350.00	7	$245.00	Conference call concerning Sony document review.
9/30/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
9/10/2014	12104	HC	2.80	350.00	7	$980.00	Review relevant documents to date; determine documents relevant to time frame/subject matter of 7/25/2005 - 7/26/2006 meetings between Sanyo/LG/MBI (SJLGCBAT_ DOJ 000001)
10/10/2014	12104	HC	7.90	350.00	7	$2,765.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
11/10/2014	12104	HC	2.00	350.00	7	$700.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
11/10/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
12/10/2014	12104	HC	8.40	350.00	7	$2,940.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
10/13/2014	12104	HC	2.50	350.00	7	$875.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/13/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/14/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/15/2014	12104	HC	9.20	350.00	7	$3,220.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/16/2014	12104	HC	7.00	350.00	7	$2,450.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/17/2014	12104	HC	7.70	350.00	7	$2,695.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
10/20/2014	12104	HC	1.70	350.00	7	$595.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/20/2014	12104	HC	6.00	350.00	7	$2,100.00	Review "Sony English" production for relevant documents. Custodian: Takanao Matsumoto
10/21/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/22/2014	12104	HC	7.60	350.00	7	$2,660.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/23/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/24/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/27/2014	12104	HC	2.90	350.00	7	$1,015.00	Review "Sony English" production for relevant documents. Custodian: Pourfallah, Ali
10/27/2014	12104	HC	6.50	350.00	7	$2,275.00	Review "Sony English" production for relevant documents. Custodian: Kitano Shinichiro
10/28/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Sony English" production for relevant documents. Custodian: Kitano Shinichiro
10/29/2014	12104	HC	8.40	350.00	7	$2,940.00	Review "Sony English" production for relevant documents. Custodian: Kitano Shinichiro
10/30/2014	12104	HC	8.60	350.00	7	$3,010.00	Review "Sony English" production for relevant documents. Custodian: Kitano Shinichiro
10/31/2014	12104	HC	5.00	350.00	7	$1,750.00	Review "Sony English" production for relevant documents. Custodian: Kitano Shinichiro
6/11/2014	12104	HC	3.70	350.00	7	$1,295.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
7/11/2014	12104	HC	6.30	350.00	7	$2,205.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
8/11/2014	12104	HC	3.20	350.00	7	$1,120.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
9/11/2014	12104	HC	5.00	350.00	7	$1,750.00	Review relevant documents to date; determine documents relevant to time frame/subject matter of 7/25/2005 - 7/26/2006 meetings between Sanyo/LG/MBI (SJLGCBAT_ DOJ 000001)
11/11/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
12/11/2014	12104	HC	8.80	350.00	7	$3,080.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
11/13/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/14/2014	12104	HC	8.30	350.00	7	$2,905.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/17/2014	12104	HC	2.50	350.00	7	$875.00	Review "Sony English" production for relevant documents. Cusdtodian: Greg King
11/17/2014	12104	HC	6.50	350.00	7	$2,275.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/18/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
11/19/2014	12104	HC	8.20	350.00	7	$2,870.00	Document review and coding conference call.
11/20/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/21/2014	12104	HC	5.90	350.00	7	$2,065.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/22/2014	12104	HC	3.40	350.00	7	$1,190.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/24/2014	12104	HC	5.00	350.00	7	$1,750.00	Review "Sony English" production for relevant documents. Custodian: Robert McCaul
11/24/2014	12104	HC	5.70	350.00	7	$1,995.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
11/25/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
11/26/2014	12104	HC	9.00	350.00	7	$3,150.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
11/28/2014	12104	HC	7.10	350.00	7	$2,485.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
6/12/2014	12104	HC	2.50	350.00	7	$875.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
8/12/2014	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_0001; Custodian: Michael Dvorak
9/12/2014	12104	HC	2.30	350.00	7	$805.00	Review relevant documents to date; determine documents relevant to time frame/subject matter of 3/19/2007 - 3/20/2007 meetings between Samsung/MBI (SDI - B000005322)
11/12/2014	12104	HC	8.60	350.00	7	$3,010.00	Document review and coding conference call.
12/12/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
12/15/2014	12104	HC	3.90	350.00	7	$1,365.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/15/2014	12104	HC	5.80	350.00	7	$2,030.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey
12/16/2014	12104	HC	1.00	350.00	7	$350.00	Conference call re document production and coding issues.
12/16/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/17/2014	12104	HC	9.40	350.00	7	$3,290.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/18/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/19/2014	12104	HC	7.50	350.00	7	$2,625.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/20/2014	12104	HC	2.80	350.00	7	$980.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/22/2014	12104	HC	3.00	350.00	7	$1,050.00	Review "Panasonic English" production for relevant documents, Batch #1_0003; Custodian: Barbara Lahey

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
12/22/2014	12104	HC	6.80	350.00	7	$2,380.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez
12/23/2014	12104	HC	8.80	350.00	7	$3,080.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
12/24/2014	12104	HC	4.10	350.00	7	$1,435.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
12/26/2014	12104	HC	8.20	350.00	7	$2,870.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
12/29/2014	12104	HC	2.00	350.00	7	$700.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez, Amy Salter
12/29/2014	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
12/30/2014	12104	HC	8.90	350.00	7	$3,115.00	Review "Panasonic English" production for relevant documents, Batch #1_0004; Custodian: David Martinez, Amy Salter
12/31/2014	12104	HC	8.50	350.00	7	$2,975.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez
1/13/2015	12104	HC	1.00	350.00	7	$350.00	Group conference call concerning Li-Ion document review.
1/13/2015	12104	HC	9.20	350.00	7	$3,220.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/14/2015	12104	HC	8.50	350.00	7	$2,975.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/15/2015	12104	HC	4.30	350.00	7	$1,505.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/15/2015	12104	HC	5.60	350.00	7	$1,960.00	Review "Panasonic English" production for relevant documents, Batch #1_0012; Custodian: Shuzo Yamada
1/16/2015	12104	HC	4.20	350.00	7	$1,470.00	Review "Panasonic English" production for relevant documents, Batch #1_0012; Custodian: Shuzo Yamada
1/19/2015	12104	HC	6.70	350.00	7	$2,345.00	Review "Panasonic English" production for relevant documents, Batch #1_0012; Custodian: Shuzo Yamada
1/20/2015	12104	HC	9.10	350.00	7	$3,185.00	Review "Panasonic English" production for relevant documents, Batch #1_0012; Custodian: Shuzo Yamada
1/21/2015	12104	HC	9.20	350.00	7	$3,220.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/22/2015	12104	HC	8.50	350.00	7	$2,975.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/26/2015	12104	HC	5.60	350.00	7	$1,960.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/28/2015	12104	HC	9.20	350.00	7	$3,220.00	Draft batch memorandum for "Sony English " review to
1/29/2015	12104	HC	9.50	350.00	7	$3,325.00	Draft batch memorandum for "Sanyo English" review to
1/30/2015	12104	HC	9.40	350.00	7	$3,290.00	Draft batch memorandum for "Panasonic English" review to date.
1/2/2015	12104	HC	8.10	350.00	7	$2,835.00	Review "Panasonic English" production for relevant documents, Batch #1_0005; Custodian: David Martinez

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
2/2/2015	12104	HC	7.10	350.00	7	$2,485.00	Draft batch memorandum for "Panasonic English" review to date.
1/3/2015	12104	HC	3.70	350.00	7	$1,295.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
2/3/2015	12104	HC	7.00	350.00	7	$2,450.00	Update cast of characters and relevant terms chart from Sanyo batch memorandum.
1/4/2015	12104	HC	3.50	350.00	7	$1,225.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
2/4/2015	12104	HC	7.50	350.00	7	$2,625.00	Update cast of characters and relevant terms chart from Sony batch memorandum.
1/5/2015	12104	HC	9.80	350.00	7	$3,430.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
2/5/2015	12104	HC	3.00	350.00	7	$2,625.00	Update cast of characters and relevant terms chart from Sony batch memorandum.
1/6/2015	12104	HC	1.00	350.00	7	$350.00	Group conference call concerning Li-Ion document review.
1/6/2015	12104	HC	8.60	350.00	7	$3,010.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
2/6/2015	12104	HC	5.00	350.00	7	$2,310.00	Update cast of characters and relevant terms chart from Panasonic batch memorandum.
1/7/2015	12104	HC	8.00	350.00	7	$2,800.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
1/8/2015	12104	HC	8.30	350.00	7	$2,905.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
1/9/2015	12104	HC	3.30	350.00	7	$1,155.00	Review "Panasonic English" production for relevant documents, Batch #1_008; Custodian: Bob Rauh
1/9/2015	12104	HC	6.00	350.00	7	$2,100.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
1/12/2015	12104	HC	4.10	350.00	7	$1,435.00	Review "Sony English" production for relevant documents. Custodian: Jisette Tran
1/12/2015	12104	HC	5.90	350.00	7	$2,065.00	Review "Sony English" production for relevant documents. Custodian: Alan Sund
7/2/2013	12104	JG	0.50	710.00	11	$355.00	Conference with JxJ and Kirk Wood re client questionnaire
6/13/2013	12104	JG	0.40	710.00	11	$284.00	Confer with CMB re discovery status and protocols for purpose of responding to plaintiffs' discovery
5/8/2015	12104	JG	1.00	710.00	11	$710.00	Conf with C. Lott and JxJ re client questionnaire responses
1/11/2017	12104	JG	0.20	875.00	11	$175.00	Correspondence from JJ re settlements
7/1/2013	12104	JJa	1.50	380.00	11	$950.00	Obtain signatures from clients re protective order
7/1/2013	12104	JJa	1.80	380.00	9	$684.00	Review allegations re Scott+Scott clients in the draft consolidated amended complaint
12/6/2013	12104	JJa	3.00	380.00	11	$1,140.00	Memo to co-counsel regarding motion to dismiss hearing for updates to proposed class representatives

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
6/20/2013	12104	JJa	0.30	380.00	11	$114.00	Summarize which clients are for which states for C. Burke
6/20/2013	12104	JJa	0.70	380.00	11	$266.00	Circulate and review client questionnaires for clients [redacted]
6/25/2013	12104	JJa	1.00	380.00	11	$380.00	Email correspondence with Wagstaff & Cartmel attorneys re client [redacted]
6/26/2013	12104	JJa	1.50	380.00	11	$570.00	Prepare and circulate questionnaires to lead counsel
6/27/2013	12104	JJa	0.50	380.00	11	$190.00	Email correspondence re [redacted]
6/28/2013	12104	JJa	1.00	380.00	11	$760.00	Forward Protective Order to all potential class representatives and their counsel
6/30/2013	12104	JJa	0.70	380.00	11	$266.00	Review protective order with client
7/16/2013	12104	JJa	0.30	380.00	11	$114.00	Review proposed order re deadlines issued at July 12, 2013 pre-filing conference
7/8/2013	12104	JJa	0.30	380.00	11	$114.00	Email re protective order signed by client [redacted]
8/19/2013	12104	JJa	0.10	380.00	11	$38.00	Email with S. Williams re status of Hawaii motion to amend
8/19/2013	12104	JJa	0.40	380.00	11	$152.00	Email with J. Kim of Schneider Wallace re Hawaii plaintiff and motion to amend
8/19/2013	12104	JJa	0.60	380.00	11	$228.00	Email with C. Burke and W. Noss re Hawaii plaintiff re motion to amend and communicate with WN and CB re same
8/22/2013	12104	JJa	0.20	380.00	11	$76.00	Call with S. Williams of Cotchett Pitre re re motion to amend
8/22/2013	12104	JJa	0.20	380.00	11	$76.00	Email with J. Kim of Schneider Wallace re status of batteries case
9/17/2013	12104	JJa	1.50	380.00	11	$570.00	Review defendants' motion to dismiss the complaints with attention to claims asserted by Scott+Scott's clients
7/12/2013	12104	JJa	1.50	380.00	11	$570.00	Calls with CB re client [redacted] and amended complaint
10/1/2014	12104	JJa	0.40	500.00	11	$200.00	Email update to Lasha Garcia, Demetrius Lambrinos, and Steve Williams regarding status of class representative preservation declarations.
10/1/2014	12104	JJa	0.40	500.00	11	$200.00	Review preservation declaration of [redacted], circulate to Lasha Garcia.
10/1/2014	12104	JJa	0.90	500.00	11	$450.00	Correspondence with plaintiff Ben Kramer regarding dates of his purchases, email correspondence with Lasha Garcia regarding same.
1/21/2014	12104	JJa	0.60	500.00	11	$300.00	Summarize order on the motion to dismiss for C. Burke, K. Anderson, W. Noss and clients [redacted]
5/2/2014	12104	JJa	2.00	500.00	11	$1,000.00	Prepare opposition to Panasonic Sanyo subsidiary motion to dismiss pursuant to assignment from J. King at Hagens Berman
7/2/2014	12104	JJa	0.30	500.00	11	$150.00	Call with Demetrius Lambrinos regarding document review of GS Yuasa documents.
7/2/2014	12104	JJa	1.00	500.00	11	$500.00	Discussion with CB and T. Boardman prior to updates to plaintiffs [redacted] and for purpose of making sure plaintiff discovery was adequately handled

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
10/2/2014	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with C. Burke regarding class rep [redacted] and document preservation declaration
10/2/2014	12104	JJa	1.50	500.00	9	$750.00	Review Judge Gonzales Roger's opinion on defendants' Motions to Dismiss; update to [redacted]
2/16/2014	12104	JJa	0.30	500.00	11	$150.00	emails with CB and WN Massachusetts' claim in response to lead counsel's inquiries about notice under statute
2/17/2014	12104	JJa	0.20	500.00	11	$100.00	Email correspondence regarding statutory notice of Massachusetts' claim in response to lead counsel
2/20/2014	12104	JJa	0.20	500.00	11	$100.00	Call with Steve Williams regarding document review project
2/25/2014	12104	JJa	0.30	500.00	11	$150.00	Email correspondence regarding document review project
2/25/2014	12104	JJa	2.50	500.00	9	$1,250.00	Review Lithium Batteries amended complaint, order on motion to dismiss, issue outline per Lead Counsel's request
2/26/2014	12104	JJa	2.00	500.00	9	$1,000.00	Review Lithium Batteries materials in anticipation of conference call with lead counsel
10/3/2014	12104	JJa	1.00	500.00	11	$500.00	Email correspondence regarding class representative [redacted].
10/3/2014	12104	JJa	1.50	500.00	11	$750.00	Review of plaintiff [redacted] discovery materials, circulate document preservation declaration to lead
12/3/2014	12104	JJa	1.30	500.00	11	$650.00	Update C. Burke, W. Noss and J. Guglielmo on status of lithium batteries antitrust case for updates for clients [redacted]
3/4/2014	12104	JJa	6.00	350.00	9	$3,000.00	Document review, english language documents.
11/4/2014	12104	JJa	0.30	500.00	11	$150.00	Email correspondence regarding receipts and materials from class rep [redacted].
3/5/2014	12104	JJa	1.80	350.00	7	$900.00	Document review; english language documents; update counsel regarding stipulation dismissing Puerto Rican claims.
6/5/2014	12104	JJa	3.00	350.00	7	$1,500.00	Document review - Panasonic/Sanyo documents.
5/13/2014	12104	JJa	3.50	500.00	11	$1,750.00	Draft and revise opposition to Defendants' PNA and SNA motion to dismiss pursuant to assignment from Jon King of Hagens Berman
5/14/2014	12104	JJa	3.50	500.00	11	$1,750.00	Finalize opposition to Defendants' motion to dismiss and circulate to Lead Counsel pursuant to assignment from Jon King of Hagens Berman
10/6/2014	12104	JJa	0.40	500.00	9	$200.00	Review of document preservation declarations of [redacted] circulate to lead counsel.
5/7/2014	12104	JJa	3.00	500.00	1	$1,500.00	Research for Opposition to Defendant subsidiaries PNA and SNA motion to dismiss pursuant to assignment from Jon King of Hagens Berman
7/29/2014	12104	JJa	0.50	500.00	11	$250.00	Email correspondence regarding document review team.
8/8/2014	12104	JJa	2.00	500.00	11	$1,000.00	Attend motion to dismiss hearing
8/13/2014	12104	JJa	1.70	500.00	11	$850.00	Conference call with lead counsel re status of document review
8/19/2014	12104	JJa	0.10	500.00	11	$50.00	Review email from J. Verducci regarding batteries document review

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
8/20/2014	12104	JJa	7.50	350.00	7	$3,750.00	Document review - Panasonic and matsushita DOJ documents; prepare batch memorandum on hottest documents
8/21/2014	12104	JJa	4.00	350.00	7	$2,000.00	Document review - Panasonic and matsushita DOJ documents; prepare batch memorandum on hottest documents
8/22/2014	12104	JJa	4.00	350.00	7	$2,000.00	Document review-Panasonic/Matsushita DOJ documents; finalize batch memo and circulate to lead counsel
8/27/2014	12104	JJa	4.40	350.00	7	$2,200.00	Document review - Panasonic/Matsushita documents
5/9/2014	12104	JJa	0.10	500.00	8	$50.00	Confer with SMS re motion to dismiss and work on motion to dismiss pursuant to assignment from Jon King of Hagens Berman
6/9/2014	12104	JJa	5.50	350.00	7	$2,750.00	Document review - Panasonic/Sanyo documents.
7/9/2014	12104	JJa	0.50	500.00	11	$250.00	Telephone call with CB regarding issues with plaintiff [redacted]
10/9/2014	12104	JJa	0.80	500.00	9	$400.00	Review Preservation declaration for plaintiff [redacted]; review plaintiff [redacted] discovery documents, circulate to lead counsel.
9/19/2014	12104	JJa	0.40	500.00	11	$200.00	Email correspondence regarding preservation declarations for class representatives.
9/22/2014	12104	JJa	0.50	500.00	11	$250.00	Email correspondence with J. Scott and G. Foster regarding lithium ion batteries class representative document preservation notice.
9/22/2014	12104	JJa	1.90	500.00	11	$950.00	Review of letters sent to Scott+Scott from lead counsel regarding needed materials from class representatives.
9/23/2014	12104	JJa	0.30	500.00	11	$150.00	Telephone call with Class Representative [redacted].
9/23/2014	12104	JJa	0.40	500.00	11	$200.00	Email correspondence regarding document preservation declarations.
9/24/2014	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with G. Forster and J. Scott regarding client document preservation declarations.
9/25/2014	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with Joe Mann and Eric Somers of Lexington Law Group regarding class representatives Jason [redacted].
9/26/2014	12104	JJa	0.20	500.00	11	$100.00	Telephone call with Lin Chan at Lieff Cabraser regarding status of lithium batteries document review.
9/30/2014	12104	JJa	0.60	500.00	11	$550.00	Email correspondence regarding status of class representative document preservation declarations.
11/26/2014	12104	JJa	2.40	500.00	11	$1,200.00	Review current status of offer with CB and T. Boardman re updates to clients [redacted], etc.
2/12/2014	12104	JJa	0.30	500.00	11	$150.00	Review letter from co-lead counsel regarding document review projects
5/12/2014	12104	JJa	0.40	500.00	11	$200.00	Call with Sylvia Sokol regarding Lithium batteries opposition to motion to dismiss draft pursuant to assignment from Jon King of Hagens Berman
5/1/2015	12104	JJa	2.10	500.00	11	$1,050.00	Prepare for and conduct conference call with Jason Kim and class rep [redacted] regarding discovery responses.
6/1/2015	12104	JJa	0.30	500.00	11	$150.00	Emails with Demetrius Lambrinos regarding potential third party subpoenas
7/1/2015	12104	JJa	0.90	500.00	11	$450.00	Confer with C. Burke re client materials for update to clients [redacted]

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
7/1/2015	12104	JJa	1.00	500.00	11	$500.00	Confer with C. Burke and T. Boardman for update to clients [redacted]
10/1/2015	12104	JJa	0.70	500.00	11	$350.00	Call with C. Burke regarding class representative issues; emails with D. Lambrinos regarding class representatives.
12/1/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with Demetrius Lambrinos regarding interrogatory verifications for second set of interrogatories
1/30/2015	12104	JJa	1.10	500.00	11	$550.00	Discussion w/ CB & TKB re update to clients [redacted]
10/2/2015	12104	JJa	0.30	500.00	11	$150.00	Emails with S. Sklaver and G. Foster regarding class representative [redacted].
10/2/2015	12104	JJa	1.00	500.00	11	$500.00	Confer with C. Burke re discovery issues of client [redacted]
12/2/2015	12104	JJa	0.50	500.00	11	$250.00	Conference call with Eric Somers of Lexington Law Group regarding class representative depositions, email correspondence regarding same
2/19/2015	12104	JJa	2.00	500.00	11	$1,000.00	Update w/ CB and JJa re discovery and status of case to provide update to clients [redacted]
2/27/2015	12104	JJa	1.10	500.00	11	$550.00	Update w/ CB and TKB re client updates to [redacted]
2/3/2015	12104	JJa	0.20	500.00	11	$100.00	Call with Thomas Boardman regarding Scott+Scott clients that are class representatives in the third amended consolidated complaint
3/27/2015	12104	JJa	1.00	500.00	11	$500.00	Update w/ CB, TKB re client updates to [redacted]
5/4/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with class rep [redacted] regarding apple purchases.
5/4/2015	12104	JJa	1.40	500.00	11	$700.00	Prepare for and conduct conference call with Eric Barton and class rep [redacted] regarding discovery responses.
4/14/2015	12104	JJa	1.00	500.00	11	$500.00	Review case with CB and TB for update to clients [redacted]
4/17/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with Demetrius Lambrinos regarding discovery responses from Class Representatives.
4/17/2015	12104	JJa	1.50	500.00	11	$750.00	Review of Interrogatories, Requests for Production, and list of class representatives to draft responses pursuant to assignment from Demetrius Lambrinos
4/20/2015	12104	JJa	0.20	500.00	11	$100.00	Review of emial correspondence regarding lithium batteries conference call.
4/21/2015	12104	JJa	2.00	500.00	11	$1,000.00	Conference call with Demetrious Lambrinos, Brent Johnson, and Emmy Levins regarding responses to discovery
4/24/2015	12104	JJa	2.50	500.00	11	$1,250.00	Emails to co-counsel regarding discovery responses for class representatives.
4/28/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with D. Lambrinos regarding status of class representatives discovery.
4/28/2015	12104	JJa	1.50	500.00	11	$750.00	Prepare for and conduct conference call with class rep [redacted] regarding discovery responses.
4/28/2015	12104	JJa	1.90	500.00	11	$950.00	Email to co-counsel regarding discovery responses for class representatives.
4/29/2015	12104	JJa	1.10	500.00	11	$550.00	Prepare for and conduct conference call with class rep [redacted] regarding discovery responses.

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
4/30/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with cocounsel regarding class rep[redacted].
4/30/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with cocounsel regarding class rep[redacted].
4/30/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with cocounsel regarding class re[redacted].
4/30/2015	12104	JJa	0.30	500.00	11	$150.00	Email updates to D. Lambrinos regarding status of discovery responses.
4/30/2015	12104	JJa	0.80	500.00	11	$400.00	Review of additional documents furnished by class rep[redacted].
4/30/2015	12104	JJa	1.00	500.00	11	$500.00	Prepare for and conduct conference call with class rep[redacted] regarding discovery responses
4/30/2015	12104	JJa	1.40	500.00	11	$700.00	Prepare for and conduct conference call with class rep[redacted] regarding discovery responses.
5/5/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with D. Lambrinos regarding status of discovery project.
5/5/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with G. Foster regarding class rep[redacted] discovery responses.
5/5/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with C. Burke regarding class representative[redacted].
5/5/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with co-counsel regarding class representatives[redacted].
10/5/2015	12104	JJa	0.30	500.00	11	$150.00	Email to C. Burke regarding class rep. issues.
10/5/2015	12104	JJa	0.70	500.00	11	$350.00	Conference call with C. Burke, E. Somers and D. Lambrinos.
5/6/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence to E. Barton regarding class representative[redacted].
5/6/2015	12104	JJa	0.80	500.00	11	$400.00	Review documents sent by counsel for[redacted].
5/6/2015	12104	JJa	1.60	500.00	11	$800.00	Prepare for and conduct conference call with R. Green and class rep.[redacted] regarding discovery responses.
5/6/2015	12104	JJa	6.00	500.00	11	$3,000.00	Draft interrogatory responses for class representatives on assignment sheet; circulate responses and additional documents to lead counsel.
5/7/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with E. Barton regarding class re[redacted] purchases.
5/7/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence to J. Scott regarding class reps[redacted]
5/7/2015	12104	JJa	8.00	500.00	11	$4,000.00	Draft and edit additional interrogatory responses; email correspondence with lead counsel regarding same.
10/7/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence regarding class representative[redacted]
10/7/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence regarding class representative[redacted].
5/8/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence regarding[redacted] battery purchases.

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
5/8/2015	12104	JJa	1.40	500.00	11	$700.00	Draft and revise interrogatory responses for class rep. [redacted].
5/8/2015	12104	JJa	3.50	500.00	11	$1,750.00	Review of finalized interrogatory responses and circulate to cocounsel and clients for review and certification signatures; email correspondence regarding same.
6/8/2015	12104	JJa	0.50	500.00	11	$250.00	Email correspondence regarding client [redacted] documents
11/8/2015	12104	JJa	0.10	500.00	11	$50.00	Email with C. Burke regarding class rep. [redacted].
3/9/2015	12104	JJa	1.10	500.00	11	$550.00	Discussion w/ CB, TKB re clients and discovery re client updates for [redacted]
5/9/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with D. Lambrinos regarding class rep. [redacted].
5/9/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with E. Barton regarding [redacted] purchases.
5/9/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with J. Kim regarding [redacted] responses.
5/9/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with D. Lambrinos regarding class reps [redacted].
5/9/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with C. Burke regarding [redacted] interrogatory responses.
5/9/2015	12104	JJa	1.00	500.00	11	$500.00	Reviews to [redacted] interrogatory responses; email correspondence regarding same.
6/9/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence regarding class reps [redacted]
9/9/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with Demetrious Lambrinos, Shana Scarlett, Marc Piloton and Dusty Foster re deposition of class rep [redacted]
10/9/2015	12104	JJa	1.50	500.00	11	$750.00	Prepare for [redacted]; draft case outline document.
9/13/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with David Young and Demetrious Lambrinos re class representative issues
9/14/2015	12104	JJa	0.10	500.00	11	$50.00	Email with Dusty Foster re [redacted] deposition
9/14/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with J. Scott re class rep [redacted]
9/14/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with C. Burke, J. Scott and D. Foster re Toshiba document requests
9/14/2015	12104	JJa	0.50	500.00	11	$250.00	Prepare for and participate in conference call re class representative discovery and depositions
9/14/2015	12104	JJa	1.00	500.00	11	$500.00	Confer with C. Burke re client info
9/15/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Joe Mann and Eric Somers re class reps and the Toshiba document requests
9/15/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Robert Green re class rep [redacted] and the Toshiba document requests
9/15/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with George Rikos re class rep [redacted] and the Toshiba document requests

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/15/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence and telephone call with class rep [redacted] re Toshiba document requests
9/15/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with Jason Kim re class rep [redacted] and the Toshiba document requests
9/15/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with Eric Barton re class rep [redacted] and the Toshiba document requests
9/16/2015	12104	JJa	0.10	500.00	11	$50.00	Email to Joe Mann re class reps and Toshiba document requests
9/17/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with Jason Kim re class rep [redacted]
9/17/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with [redacted] re document requests from Toshiba
9/17/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Casey Lott re class rep [redacted]
9/17/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with J. Scott re class rep [redacted]
9/17/2015	12104	JJa	0.30	500.00	11	$150.00	Conference call with Demetrious Lambrinos and David Young re responses to Toshiba document requests
9/17/2015	12104	JJa	0.60	500.00	11	$300.00	Email update to Demetrious Lambrinos re class reps and Toshiba document requests
9/18/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with Joe Mann re class reps and Toshiba document requests
9/18/2015	12104	JJa	0.50	500.00	11	$250.00	Update email to Demetrious Lambrinos re class rep responses to Toshiba document requests
9/21/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with D. Foster and Steven Sklaver re [redacted] deposition
9/22/2015	12104	JJa	0.30	500.00	11	$150.00	Conference call with Demetrious Lambrinos, David Young and Joshua Prince
9/22/2015	12104	JJa	0.30	500.00	11	$150.00	Update to Demetrious Lambrinos re unresponsive counsel
9/22/2015	12104	JJa	0.40	500.00	11	$200.00	Conference call with [redacted] re dismissal
9/24/2015	12104	JJa	0.20	500.00	11	$100.00	Email update to Demetrious Lambrinos re class rep [redacted]
9/24/2015	12104	JJa	0.20	500.00	11	$100.00	Call with Eric Somers re class rep [redacted]
9/25/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with George Rikos re class rep [redacted]
9/25/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with Demetrious Lambrinos re class rep [redacted]
9/25/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Demetrious Lambrinos re [redacted]
9/25/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Robert Green re class rep [redacted]
9/25/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with C. Burke re class rep [redacted]

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
9/26/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with George Rikos re class rep [redacted]
9/28/2015	12104	JJa	0.20	500.00	11	$100.00	Call with D. Foster re [redacted] deposition
9/28/2015	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Demetrious Lambrinos re class rep issues and Toshiba requests for production
9/30/2015	12104	JJa	0.50	500.00	11	$250.00	Conference with Plaintiffs' counsel and defense counsel re class rep issues and discovery
5/10/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with G. Foster regarding [redacted] responses.
5/10/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence to E. Somers and J. Mann regarding discovery responses for [redacted]
8/10/2015	12104	JJa	0.90	500.00	11	$450.00	Confer with C. Burke and T. Boardman re status re [redacted]
9/10/2015	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with Demetrious Lambrinos, Shana Scarlett, Marc Piloton and Dusty Foster re [redacted] deposition
12/10/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with George Rikos, lead counsel and Susman Godfrey attorneys regarding deposition of class rep [redacted]
10/26/2015	12104	JJa	1.50	500.00	11	$750.00	Prepare for and conduct conference call with G. Foster, S. Sklaver and [redacted].
10/27/2015	12104	JJa	8.00	500.00	11	$4,000.00	Deposition prep for [redacted] deposition.
10/28/2015	12104	JJa	6.00	500.00	11	$3,000.00	Prepare for and attend [redacted] deposition.
5/11/2015	12104	JJa	1.50	500.00	11	$750.00	Prepare for and conduct conference call with C. Burke and class representative [redacted]
5/11/2015	12104	JJa	5.00	500.00	3	$2,500.00	Revisions to interrogatory responses (3.9); email correspondence with cocounsel regarding final interrogatory responses (.5); client certifications and client purchases (.6)
6/11/2015	12104	JJa	0.40	500.00	11	$200.00	Email correspondence regarding class rep [redacted]
11/11/2015	12104	JJa	0.30	500.00	11	$150.00	Email with D. Lambrinos regarding class rep. [redacted].
11/13/2015	12104	JJa	0.20	500.00	11	$100.00	Email with C. Burke regarding potential class rep. [redacted]
11/20/2015	12104	JJa	0.50	500.00	11	$250.00	Conference with C. Burke regarding class rep [redacted]
11/21/2015	12104	JJa	0.50	500.00	11	$250.00	Conference with C. Burke regarding class rep. [redacted].
11/23/2015	12104	JJa	0.20	500.00	11	$100.00	Conference with C. Burke regarding substitution of class rep. [redacted].
11/25/2015	12104	JJa	0.20	500.00	11	$100.00	Emails with S. Sklaver regarding deposition scheduling.
11/25/2015	12104	JJa	1.00	500.00	11	$500.00	Prepare client questionnaire for class rep. [redacted]; email correspondence with C. Burke and T. Turner
11/29/2015	12104	JJa	0.30	500.00	11	$150.00	Emails to D. Lambrinos regarding signed client retainer agreement.

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
11/30/2015	12104	JJa	0.20	500.00	11	$100.00	Emails to D. Lambrinos regarding client questionnaire.
5/12/2015	12104	JJa	3.00	500.00	11	$1,500.00	Email correspondence regarding client certifications for interrogatory responses for [redacted]
9/12/2015	12104	JJa	0.10	500.00	11	$50.00	Email correspondence with David Young and Demetrious Lambrinos re class representative issues
2/1/2016	12104	JJa	0.50	500.00	11	$250.00	Email correspondence with George Rikos and Lead Counsel regarding [redacted] deposotion
3/1/2016	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with G. Rikos regarding Plaintiff [redacted]
8/1/2016	12104	JJa	0.30	500.00	11	$150.00	Emails regarding [redacted] lithium battery purchase
2/2/2016	12104	JJa	0.40	500.00	11	$200.00	Teleconference with Krysta Pachman regarding [redacted] deposition
2/2/2016	12104	JJa	0.50	500.00	11	$250.00	Email correspondence regarding [redacted] deposition
2/2/2016	12104	JJa	0.50	500.00	11	$250.00	Email correspondence regarding [redacted] deposition
2/2/2016	12104	JJa	1.20	500.00	11	$600.00	Email correspondence with co-lead counsel regarding depostion of [redacted]
2/2/2016	12104	JJa	4.50	500.00	3	$2,250.00	Prepare for and attend deposition preparation meeting with [redacted]
8/2/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence regarding [redacted] lithium battery purchases
12/2/2016	12104	JJa	0.80	575.00	11	$460.00	Case update re substitution of [redacted]
2/15/2016	12104	JJa	0.70	500.00	11	$350.00	Conference with CB re clients and [redacted]
2/16/2016	12104	JJa	0.50	500.00	11	$250.00	Conference with Susman Godfrey and CB re [redacted] deposition
2/18/2016	12104	JJa	0.50	500.00	11	$250.00	Conference with Susman Godfrey, CB, and DJ re [redacted] deposition
2/3/2016	12104	JJa	0.30	500.00	11	$150.00	Email correspondence regarding [redacted] deposition
2/3/2016	12104	JJa	8.00	500.00	5	$4,000.00	Prepare for and attend deposition of [redacted]
3/3/2016	12104	JJa	1.30	500.00	11	$650.00	Email correspondence with K. Kauble Pachman of Susman Godfrey regarding class rep [redacted] r deposition; call with [redacted] re same.
3/13/2016	12104	JJa	1.00	500.00	11	$500.00	Confer with C. Burke regarding [redacted] deposition.
3/14/2016	12104	JJa	4.50	500.00	11	$2,250.00	Meeting with [redacted] and C. Burke to prepare for deposition.
3/15/2016	12104	JJa	8.50	500.00	11	$4,250.00	Prepare for and attend [redacted] deposition; confer with C. Burke regarding same.
3/21/2016	12104	JJa	0.30	500.00	11	$150.00	Discussion with C. Burke re [redacted]

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
4/20/2016	12104	JJa	0.40	500.00	11	$200.00	email correspondence with [redacted] re supplemental interrogatory verification
4/21/2016	12104	JJa	0.30	500.00	11	$150.00	email correspondence with Demetrius Lambrinos re [redacted] depositions
4/21/2016	12104	JJa	0.30	500.00	11	$150.00	email correspondence with Krysta Pachman re [redacted] interrogatory verification
4/5/2016	12104	JJa	2.50	500.00	11	$1,250.00	Prepare for and participate in conference call with Demetrius Lambrinos, Gary Foster, [redacted] regarding document collection; email correspondence with Gary
5/5/2016	12104	JJa	0.40	500.00	11	$200.00	Email correspondence regarding [redacted] deposition errata form.
4/6/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Gary Foster regarding [redacted] document production
4/6/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with Krysta Kauble Pachman regarding [redacted] deposition errata
6/17/2016	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with Michael Caylao and Demetrius Lambrinos regarding battery pack manufacturers and [redacted] laptop's service tag.
6/21/2016	12104	JJa	0.60	500.00	11	$300.00	Confer with [redacted] regarding battery pack manufacturer and service tag on laptop.
6/30/2016	12104	JJa	0.50	500.00	11	$250.00	Update email to Daryl Scott regarding status of case and settlement with Sony.
3/7/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with C. Burke and K. Kauble Pachman re [redacted] deposition.
3/7/2016	12104	JJa	1.00	500.00	11	$500.00	Email correspondence regarding supplemental rog responses and verifications.
4/7/2016	12104	JJa	0.60	500.00	11	$300.00	Email correspondence with Krysta Pachman, review of defendants' second set of requests for production
7/21/2016	12104	JJa	1.00	500.00	11	$500.00	Confer with [redacted] regarding identifying numbers on Lithium Battery in laptop.
3/9/2016	12104	JJa	0.20	500.00	11	$100.00	Email with co-counsel regarding [redacted] deposition location proposed by defendants.
3/9/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with K. Kauble Pachman regarding [redacted] errata sheet.
3/9/2016	12104	JJa	0.20	500.00	11	$100.00	Emails regarding [redacted] document production.
3/9/2016	12104	JJa	0.30	500.00	11	$150.00	Email correspondence with C. Lott regarding confirmation of discovery items and signed verifications.
3/9/2016	12104	JJa	0.40	500.00	11	$200.00	Email correspondence with K. Pachman and C. Burke regarding [redacted] deposition.
3/10/2016	12104	JJa	0.40	500.00	11	$200.00	Conference call with C. Burke and L. Eccles regarding [redacted] deposition.
3/11/2016	12104	JJa	0.20	500.00	11	$100.00	Email correspondence with D. Lambrinos regarding Plaintiff [redacted].
3/11/2016	12104	JJa	0.50	500.00	11	$250.00	Prepare for [redacted] deposition preparation.
3/11/2016	12104	JJa	0.50	500.00	11	$250.00	Email correspondence with D. Lambrinos regarding [redacted] regarding document production.

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
3/11/2016	12104	JJa	1.20	500.00	11	$600.00	Email correspondence to [redacted], D. Lambrinos, G. Foster regarding additional verifications to document request responses.
4/11/2016	12104	JJa	0.50	500.00	9	$250.00	Review [redacted] responses and objections to third set of interrogatories
11/21/2016	12104	JJa	0.10	575.00	11	$57.50	Email correspondence with GDF re [redacted] approval of settlement.
11/21/2016	12104	JJa	0.10	575.00	11	$57.50	Email correspondence with CB re LG Chem settlement.
11/21/2016	12104	JJa	0.20	575.00	11	$115.00	Email correspondence with [redacted] re LG Chem settlement.
11/21/2016	12104	JJa	0.50	575.00	11	$287.50	Email correspondence with Colleen Cleary regarding settlement with LG Chem.
11/21/2016	12104	JJa	1.00	575.00	11	$575.00	Review settlement agreement with LG Chem.
11/23/2016	12104	JJa	0.10	575.00	11	$57.50	Email correspondence with GDF re [redacted] approval of settlement.
4/12/2016	12104	JJa	0.50	500.00	11	$250.00	Review [redacted] responses and objections to third set of interrogatories
12/16/2016	12104	JJa	1.50	575.00	11	$862.50	Review settlement agreement with Hitachi Maxell (1.0); email correspondence with G. Foster and [redacted] re update to [redacted] on settlement (.5)
1/4/2017	12104	JJa	1.50	575.00	11	$862.50	Review of NEC corporation settlement documentation; email correspondence regarding same
1/6/2017	12104	JJa	0.50	575.00	11	$287.50	Email correspondence regarding NEC corporation
2/10/2017	12104	JJa	1.00	575.00	11	$575.00	Confer with C. Burke re settlement
1/11/2017	12104	JJa	0.50	575.00	11	$287.50	Email correspondence to Chris Burke, Walter Noss and Joe Guglielmo regarding summary of all settlements in the case
9/22/2014	12104	JJS	0.50	380.00	11	$190.00	Email correspondence with JJa and G. Foster regarding lithium ion batteries class representative document preservation notice.
9/24/2014	12104	JJS	0.40	380.00	11	$152.00	Email correspondence with G. Foster and J. Scott regarding client document preservation declarations.
5/7/2015	12104	JJS	0.30	380.00	11	$114.00	emails with JJasnoch re class reps [redacted]
9/14/2015	12104	JJS	0.20	380.00	11	$76.00	Email with J. Jasnoch re class rep [redacted]
9/14/2015	12104	JJS	0.40	380.00	11	$152.00	Emails with C. Burke, J. Jasnoch and D. Foster re Toshiba requests
9/17/2015	12104	JJS	0.20	380.00	11	$76.00	Email with J. Jasnoch re class rep [redacted]
9/17/2015	12104	JJS	1.50	380.00	11	$570.00	Contacted clients regarding Toshiba questions; collected documents from clients
5/11/2015	12104	JJS	1.00	380.00	11	$380.00	Reviewed [redacted] interrogatory responses and emailed for approval
5/23/2014	12104	SMS	0.30	675.00	11	$202.50	Confer with C. Burke re status for purpose of responding to lead counsel's request (.2); email to S. Williams re case (.1).

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
5/9/2014	12104	SMS	0.70	675.00	11	$472.50	Confer with J. Janosch re motion to dismiss and work on motion to dismiss pursuant to assignment from Jon King of Hagens Berman
5/12/2014	12104	SMS	0.40	675.00	11	$270.00	Call with J. Jasnoch regarding Lithium batteries opposition to motion to dismiss draft pursuant to assignment from Jon King of Hagens Berman
7/2/2014	12104	TKB	1.00	500.00	11	$500.00	Discussion with J. Jasnoch and C. Burke prior to updates to plaintiffs [redacted] and for purpose of making sure plaintiff discovery was adequately handled
7/29/2014	12104	TKB	0.40	500.00	9	$200.00	Review and sign protective order
11/26/2014	12104	TKB	2.40	500.00	11	$1,200.00	Review current status of offer with JJa and CB re updates to clients [redacted], etc.
7/1/2015	12104	TKB	1.00	500.00	11	$500.00	Confer with C. Burke and J. Jasnoch re client materials for update to clients [redacted]
1/30/2015	12104	TKB	1.10	500.00	11	$550.00	Discussion w/ CB & Jja update to clients [redacted]
2/19/2015	12104	TKB	2.00	500.00	11	$1,000.00	Update w/ CB and JJa re discovery and status of case to provide update to clients [redacted]
2/27/2015	12104	TKB	1.10	500.00	11	$550.00	Update w/ CB and Jja re client updates to [redacted]
2/3/2015	12104	TKB	0.20	500.00	11	$100.00	Call w/ JJa re S+S clients that are class representatives in third amended consolidated complaint.
3/27/2015	12104	TKB	1.00	500.00	11	$500.00	Update w/ CB, Jja re updates to [redacted]
4/14/2015	12104	TKB	1.00	500.00	11	$500.00	Confer with CBurke and JJasnoch for updates to clients [redacted]
2/9/2015	12104	TKB	0.40	500.00	11	$200.00	(.2) discuss upcoming hearings with B. Glackin from lead counsel, (.2) draft email to W. Noss and C. Burke about phone call with B. Glackin.
3/9/2015	12104	TKB	1.10	500.00	11	$550.00	Discussion w/ CB, JJa re clients and discovery for client updates for [redacted]
8/10/2015	12104	TKB	0.90	500.00	11	$450.00	Confer with C. Burke and J. Jasnoch re status of [redacted]
7/2/2013	12104	WN	0.40	675.00	11	$270.00	Communicate with J. Jasnoch re client coverage for amended complaint to access claims for relief and discuss additional claim coverage.
6/21/2013	12104	WN	2.50	675.00	11	$1,687.50	Discussion with CB, JF and Eric Fastiff of Lieff Cabraser re clients in various states and claims for relief
8/20/2013	12104	WN	0.10	675.00	11	$67.50	Review email from S. Williams repleading Hawaii claims for relief
8/22/2013	12104	WN	0.40	675.00	11	$270.00	Review emails from John Jasnoch re Hawaii claims for relief and complaint; communication with John Jasnoch re the same
1/21/2014	12104	WN	0.20	675.00	11	$135.00	Review email from JJa re MTD order concerning length of class period and whether subsidiaries conspired
2/16/2014	12104	WN	0.30	675.00	11	$202.50	Emails with Chris Burke and John Jasnoch re Massachusetts' claim in response to lead counsel's inquiries about notice under statute
2/17/2014	12104	WN	0.20	675.00	11	$135.00	Emails with L. Chan, Chris Burke, and John Jasnoch re statutory notice of Massachusetts' claim in response to lead counsel
2/12/2014	12104	WN	0.40	675.00	11	$270.00	Review letter from lead counsel re document review; emails re the same

Date	Matter	Lwyr	Hours	Rate	Billing Task Code	Amount	Explanation
1/11/2017	12104	WN	0.20	825.00	11	$165.00	Email from J. Jasnoch re settlements

EXHIBIT E

EXHIBIT E
EXPENSE SUMMARY
JUNE 1, 2013 TO FEBRUARY 28, 2017
IN RE: LITHIUM ION BATTERIES INDIRECT
SCOTT+SCOTT ATTORNEYS AT LAW LLP

CATEGORY	CUMULATIVE COSTS
Litigation Assessment	$50,000.00
Court Costs	$700.00
Federal Express/UPS	$406.85
Hearing Transcripts	$5,949.90
Lexis/Westlaw	$654.39
Photocopies - in House	$2,478.00
Postage	$27.78
Telephone/telecopier	$461.32
Travel	$7,001.29
TOTAL	$67,679.53

EXHIBIT 60

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF GREGORY P. FORNEY IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SHAFFER LOMBARDO SHURIN**

I, Gregory P. Forney, declare:

1. I am a Shareholder of Shaffer Lombardo Shurin, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Joseph O'Daniel and as counsel for IPPs throughout the course of this litigation. The background and experience of Shaffer Lombardo Shurin and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Shaffer Lombardo Shurin performed the following work: Our firm secured a class representative for affected residents of the State of Missouri. Our work was primarily involved in acting as counsel for the Missouri class representative as well as coordinating with lead class counsel in the preparation and production of the Missouri Class Representatives documentation of proof of purchase of Lithium Ion Batteries. Our firm also assisted in the preparation and production of the Missouri class representative, Joseph O'Daniel, for his deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Shaffer Lombardo Shurin's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Shaffer Lombardo Shurin during this period of time was 43.8, with a corresponding lodestar based on current rates of $25,875.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This

summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Shaffer Lombardo Shurin.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Shaffer Lombardo Shurin has incurred during the course of this litigation. Shaffer Lombardo Shurin expended a total of $44.89 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Shaffer Lombardo Shurin on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Shaffer Lombardo Shurin in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on this 23rd day of May, 2017 at Kansas City, Missouri.

/s/ Gregory P. Forney

Gregory P. Forney

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

SHAFFER LOMBARDO SHURIN

CURRICULUM VITAE

Shaffer Lombardo Shurin is a law firm located in Kansas City, Missouri which has been involved over the past twenty years in a variety of complex commercial cases and class action related litigation. The members of the firm principally involved in these activities are as follows:

1. Richard Lombardo, Shareholder – Mr. Lombardo has served as lead counsel in recovery in excess of $250,000,000.00 for the bankruptcy receiver as part of the *General American* litigation. Mr. Lombardo is currently active as affiliate/co-lead counsel on behalf of clients in the corrugated box class action litigation currently pending in the United States District Court Northern District of Illinois and styled *Kleen Products LLC, et. Al. vs. Packaging Corporation of America, et al., Case No. 1:1-cv-05711*. Mr. Lombardo is also serving as lead counsel in a class action case on behalf of independent truck drivers filed in the United States District Court for the District of Kansas and styled *Fox vs. Trans Am Trucking, et al., Case No. 12-cv-2706*. Mr. Lombardo has also been lead counsel in numerous other complex commercial actions involving recovery of millions of dollars on behalf of commercial clients.

2. Gregory Forney, Shareholder – Mr. Forney has 29 years-experience in handling both commercial matters and professional negligence matters. Mr. Forney has served as lead counsel on indirect purchaser claims arising out of the price fixing of vitamins which resulting in the multi-million dollar award for his individually represented clients. Mr. Forney is also class counsel on behalf of Iowa farmers who are presently part of the *Syngenta Corn* litigation pending in both United States District Court for the District of Kansas and Hennepin County Court in

Minneapolis, Minnesota. Mr. Forney also assists Mr. Lombardo with various class action cases or complex commercial actions.

3. James Myers, Shareholder – Mr. Myers has been intimately involved in assisting Mr. Lombardo with handling the cases described above in which this firm has served as lead counsel or otherwise represented class representatives as so indicated above.

EXHIBIT B

EXHIBIT B

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

Firm Name:

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Greg Forney (P)									0.80		2.20				3.00	$600.00	$1,800.00
James Myers (P)			10.50				5.90				16.60	6.90			39.90	$600.00	$23,940.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	0.00	0.00	10.50	0.00	0.00	0.00	5.90	0.00	0.80	0.00	18.80	6.90	0.00	0.00	42.90		$25,740.00
NON-ATTORNEYS																	
Dawn Miller (PL)											0.90				0.90	$150.00	$135.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.90	0.00	0.00	0.00	0.90		$135.00
GRAND TOTAL:	0.00	0.00	10.50	0.00	0.00	0.00	5.90	0.00	0.80	0.00	19.70	6.90	0.00	0.00	43.80		$25,875.00

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

SHAFFER LOMBARDO SHURIN

ATTORNEYS	DATE RANGE	HOURLY RATE
Gregory P. Forney	2014	550.00
	2015	575.00
	2016	575.00
	2017	600.00
James D. Myers	2014	550.00
	2015	575.00
	2016	600.00
	2017	600.00
NON-ATTORNEYS	DATE RANGE	HOURLY RATE
Dawn A. Miller	2016	150.00
	2017	150.00

EXHIBIT D

(REDACTED)

Shaffer Lombardo Shurin

Mic Jurgens

3/31/2017
Account No: 9687-0019
Statement No: 41869

Re: Lithium Ion Batteries

Date	Atty	Task	Description	Hours	Amount
03-11-2014	GPF	11	[redacted]	0.20	110
03-11-2014	GPF	9	[redacted]	0.80	440
09-22-2014	GPF	11	Telephone call with Tom Brill regarding update on case. Read client information forms and begin completing information.	1.00	550
09-23-2014	JDM	7	Work with Greg Forney regarding information needed from [redacted] and review Document Preservation Declaration.	0.40	220
09-24-2014	JDM	11	Revise declaration (.2); Correspondence to client regarding declaration and obligations thereunder (.2).	0.40	220
10-06-2014	JDM	11	[redacted]	0.20	110
10-07-2014	JDM	7	[redacted]	0.20	110
04-23-2015	JDM	11	Multiple correspondence and telephone call with J. Prince regarding [redacted]	0.40	230
04-24-2015	JDM	3	Review discovery from defendants (.4); Correspondence and telephone conversation [redacted]	1.20	690
04-28-2015	JDM	11	[redacted] regarding scheduling discovery conference call [redacted]	0.10	57.5
04-29-2015	JDM	3	Telephone call with [redacted] about discovery responses.	0.40	230
05-04-2015	GPF	11	Participate in conference call with [redacted] and liaison discovery counsel regarding complete answers to pending discovery.	1.00	575
05-04-2015	JDM	3	Conference call with J. Prince and [redacted] regarding answers to interrogatories and document requests (.6); [redacted]	0.80	460
09-15-2015	JDM	3	[redacted]	0.20	115
09-29-2015	JDM	11	Correspondence to and from J. Prince regarding [redacted]	0.20	115
10-05-2015	JDM	3	Work with J. Prince regarding discovery issues related to RFP, [redacted]	0.30	172.5

Shaffer Lombardo Shurin

Mic Jurgens

3/31/2017
Account No: 9687-0019
Statement No: 41869

Re: Lithium Ion Batteries

Date	Atty	Task	Description	Hours	Amount
10-08-2015	JDM	3	Work with J. Prince on discovery issues related to [redacted]	1.20	690
01-06-2016	JDM	3	[redacted]	0.10	60
01-13-2016	JDM	3	Draft verification for Supp. Response to Second Roggs (.2); [redacted] regarding same (.1).	0.30	180
02-01-2016	JDM	3	[redacted]	0.30	180
02-02-2016	JDM	3	Receive signed verification from [redacted]	0.20	120
03-01-2016	JDM	11	Multiple telephone calls and correspondence with [redacted]	0.60	360
03-02-2016	JDM	11	Multiple correspondence with co-counsel [redacted] regarding deposition of [redacted]	1.20	720
03-02-2016	JDM	7	Review deposition preparation outline and deposition transcript from [redacted] deposition (3.4).	3.40	2040
03-05-2016	JDM	11	Multiple correspondence with counsel Pachman about Case Management Conference.	0.20	120
03-05-2016	JDM	11	Correspondence with Ms. Pachman regarding deposition of [redacted] and deposition preparation meeting.	0.20	120
03-08-2016	JDM	3	Review Amended discovery responses (.3) and work with class representative and Ms. Pachman regarding same (.3).	0.60	360
03-11-2016	JDM	3	Work with Ms., Pachman on 3/10 ruling on discovery and need for additional information from [redacted] verifications, etc...	0.50	300
03-14-2016	JDM	11	Work with Class Representative on protective order issues (.4)	0.40	240
03-14-2016	JDM	3	[redacted] (.2);Work with co-counsel on finalizing discovery issues (.2)	0.40	240
03-15-2016	JDM	3	Telephone call and correspondence with Mr. Lambrinos recovery discovery matters (.3); Forward executed verifications to counsel (.1)	0.40	240
03-18-2016	JDM	12	Correspondence from co-counsel Lambrinos regarding Sony proposed settlement [redacted]	1.80	1080

Shaffer Lombardo Shurin

Mic Jurgens

3/31/2017
Account No: 9687-0019
Statement No: 41869

Re: Lithium Ion Batteries

Date	Atty	Task	Description	Hours	Amount
03-19-2016	JDM	12	[redacted]	2.60	1560
03-19-2016	JDM	3	Multiple correspondence with lead counsel regarding discovery matters and need for vendor to run search on [redacted].	0.30	180
03-20-2016	JDM	3	Travel to and from meeting with [redacted] get computer/battery at issue for discovery.	1.40	840
03-24-2016	JDM	11	Multiple correspondence with Ms. Pachman and [redacted] (.3); Multiple correspondence with Mr. Lambrinos regarding vendor's review of [redacted]	0.50	300
03-27-2016	JDM	11	Multiple correspondence with [redacted] in preparation for 3/28 conference call with discovery vendor.	0.50	300
03-28-2016	JDM	11	Work with [redacted] to prepare for discovery conference call (.5); Correspondence with principal counsel to finalize deposition prep session (.2); Conference call with [redacted] (.9); Principal counsel and vender for a	1.90	1140
03-29-2016	JDM	11	Correspondence to and from D. Lambrinos regarding discovery issues, meta data for photos of computer and battery	0.20	120
03-31-2016	JDM	11	[redacted]	0.30	180
04-04-2016	JDM	7	Review documents for [redacted]	1.90	1140
04-08-2016	JDM	3	[redacted] confirming review of Second Request for Production.	0.10	60
04-12-2016	JDM	11	Multiple correspondence with client and Ms. Pachman regarding discovery issues(.3); [redacted]	2.30	1380
04-14-2016	JDM	11	Prepare for deposition preparation of [redacted]	2.60	1560
04-15-2016	JDM	11	Participate in deposition prep of [redacted] (3.7).	3.70	2220
04-15-2016	JDM	3	Work with Ms. Pachman on discovery issues (.5).	0.50	300
04-21-2016	JDM	3	Multiple correspondence with counsel and Mo Class [redacted]; Secure verification and forward same to K. Pachman (.2); Multiple correspondence with counsel regarding photo (.2)	0.60	360

Shaffer Lombardo Shurin

Mic Jurgens — Page 5
3/31/2017
Account No: 9687-0019
Re: Lithium Ion Batteries — Statement No: 41869

Date	Atty	Task	Description	Hours	Amount
04-26-2016	JDM	3	Correspondence from Ms. Pachman regarding revision to interrogatory response.	0.10	60
05-09-2016	JDM	11	Correspondence from co-counsel with [redacted] deposition (.1); Correspondence to [redacted] with instructions regarding deposition review (.2)	0.30	180
05-16-2016	DAM	11	Work with Time and Expense reports.	0.70	105
05-18-2016	JDM	11	Correspondence from [redacted] regarding depo review and correction.	0.20	120
05-19-2016	JDM	11	Work with [redacted] on Eratta Sheet.	0.20	120
05-20-2016	DAM	11	Complete and submit Time & Expense Reports for March and April 2016 to Mr. Myers for review.	0.20	30
06-21-2016	JDM	3	Correspondence from co-counsel Pachman re: additional information needed from laptop (.1); work with staff and [redacted] to get additional information (.3)	0.40	240
07-01-2016	JDM	3	Correspondence with co-counsel Pachman on receipt of UL numbers, etc.	0.20	120
11-29-2016	JDM	12	[redacted]	1.40	840
01-04-2017	JDM	12	[redacted]	0.20	120
01-06-2017	JDM	12	[redacted]	0.90	540
			For Current Services Rendered	43.80	25,570.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
SHAFFER LOMBARDO SHURIN
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	13.50
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	31.39
TOTAL:	$44.89

EXHIBIT 61

Timothy D. Battin
Nathan M. Cihlar
STRAUS & BOIES, LLP
4041 University Drive, Fifth Floor
Fairfax, VA 22030
tbattin@straus-boies.com
ncihlar@straus-boies.com

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF NATHAN M. CIHLAR IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF STRAUS & BOIES, LLP**

I, Nathan M. Cihlar, declare:

1. I am a partner of Straus & Boies, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to William Cabral, Scott Beall, Theodore Wolfendale, Christopher Bessette, Tom Pham, Kathleen Tawney, and Calvin Calkins and as counsel for IPPs throughout the course of this litigation. The background and experience of Straus & Boies, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Straus & Boies, LLP performed the following tasks among others:

- Straus & Boies, LLP was part of a leadership team tasked with designing the infrastructure to process the discovery produced by defendants. This included assisting in the creation of the coding manual, the coding panes in the review platform, and developing, implementing and managing the strategy and procedures for the electronic review platforms. As one of the few Korean-speaking attorneys, Shinae Kim-Helms of my firm led the initial review of Korean documents and identified evidence for use at depositions and by the experts in preparation for class certification and trial. My firm created specialized foreign language searches and coordinated with other Plaintiff groups regarding production issues.

- Straus & Boies, LLP oversaw the translation process for foreign language materials produced by Defendants and their co-conspirators, which involved regular coordination with Co-Lead Counsel and the deposition and briefing teams. My firm was also the liaison between Co-Lead Counsel and the various translation certification companies. In this role, we served as the gatekeepers for translation requests, evaluating the documents before sending them for translation and preventing duplicate or unnecessary translations from being requested or entered into the record. As part of this process, we performed quality control to ensure all translations conformed to the translation protocol and that material

deemed necessary for use as evidence in briefing, deposition, and trial, was appropriately certified. In this regard, Straus & Boies was responsible for raising and defending countless translation objections, which involved regularly meeting and conferring with defendants and close coordination with Direct Purchaser Plaintiffs to ensure consistency and accuracy wherever practicable. For efficiency, Straus & Boies maintained current charts tracking the progress of translations and objections as well as deposition exhibits.

- Straus & Boies, LLP assisted in deposition preparation of numerous witnesses. In helping to prepare for depositions of defense witnesses, we were responsible for locating, analyzing, and compiling relevant foreign language materials and translations. In addition, attorneys from Straus & Boies assisted in coordinating the preservation and production efforts for the named class representatives and worked with local counsel to prepare for their depositions.

- Straus & Boies, LLP assisted Co-Lead Counsel in the research and drafting of the opposition brief in response to Sony's Motion to dismiss.

5. Attached hereto as **Exhibit B** is a billing summary of Straus & Boies, LLP's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Straus & Boies, LLP. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Straus & Boies, LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Nathan M. Cihlar in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Straus & Boies, LLP and filed on May 26, 2017 (ECF No. 1813- Exhibit 38 Part 1 and 2). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Straus & Boies, LLP since June 1, 2013 was 7,057.10 with a corresponding lodestar based on current rates of $2,474,330.00.

8. Attached hereto as **Exhibit D** is a summary of the expenses Straus & Boies, LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Straus & Boies, LLP

expended a total of $125,609.65 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Straus & Boies, LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Straus & Boies, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Fairfax, Virginia.

/s/ Nathan M. Cihlar

Nathan M. Cihlar

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

In re Lithium Ion Batteries Antitrust Litigation

STRAUS & BOIES, LLP

Curriculum Vitae

STRAUS & BOIES, LLP FIRM BIOGRAPHY

Straus & Boies, LLP is widely recognized as a leading law firm in the fields of antitrust and consumer protection class action litigation. With offices in Virginia, California, Tennessee, and Colorado, the firm's lawyers have successfully prosecuted antitrust and consumer protection claims in federal and state courts throughout the United States.

Founded in 1995, the firm has been at the forefront of national efforts to bring to heel corporations engaged in restraints of trade, consumer fraud, and other unlawful conduct. The firm has been lead counsel in some of the largest class actions in the past decade, including the vitamins and DRAM litigations. More recently, Straus & Boies lawyers have led litigation efforts against manufacturers of agricultural and refrigeration products for violations of competition laws and a major insurance carrier for breach of its fiduciary duty to a certified class of policyholders. Recognized by courts, private practitioners, and law enforcement authorities throughout the United States as competent, experienced, and vigilant, Straus & Boies lawyers have recovered hundreds of millions of dollars for consumers and businesses.

The Firm's Attorneys

David Boies

Mr. Boies is Senior Partner at Straus & Boies. His practice is focused on representing individuals and businesses in antitrust and consumer protection litigation in state and federal courts. Mr. Boies has a national reputation in the indirect purchaser antitrust litigation realm, and has served as a speaker and panelist for the American Bar Association and other legal organizations. Mr. Boies has served as sole lead or co-lead counsel in numerous antitrust and consumer protection class actions. He is admitted to practice in all state and federal courts in the Commonwealth of Virginia, as well as the United States Courts of Appeals for the Fourth and Tenth Circuits.

Mr. Boies obtained his bachelor's degree from the University of Redlands and his law degree from William & Mary Law School (J.D. 1991). Prior to joining the Firm, Mr. Boies represented individuals and corporations as an attorney in the Washington, D.C. offices of national law firms in the practice areas of corporate litigation, international trade, and white collar criminal defense.

Timothy D. Battin

Mr. Battin, the managing partner at Straus & Boies, LLP, has a wealth of experience in complex litigation. He has served as lead counsel in numerous antitrust and consumer protection class actions in state and federal courts around the country, resulting in recoveries of hundreds of millions of dollars for consumers. Mr. Battin has prosecuted cases across a broad spectrum of industries, including, pharmaceuticals, food additives, vitamins, agricultural and computer-based products. He currently serves as lead or co-lead counsel in a number of cases including:

- ***Northwestern Mutual Insurance Litigation***. Mr. Battin served as co-lead counsel in

state and federal court actions alleging that Northwestern Mutual Life Insurance Company breached its contractual and fiduciary duties to owners of certain investment annuities it issued. This case was litigated in multiple jurisdictions and was ultimately settled for $84 million.

- ***Dynamic Random Access Memory Antitrust Litigation***. Mr. Battin served as co-lead counsel in state and federal court actions alleging price fixing among makers of computer memory chips. Settlements totaling more than $300 million were approved in the United States District Court for the Northern District of California.
- ***Processed Egg Products Antitrust Litigation***. Mr. Battin serves as co-lead counsel for indirect purchasers alleging a market allocation scheme in the egg industry.

Mr. Battin, a recognized authority on the prosecution of class actions, has lectured on issues of coordination between attorneys general and private lawyers in class cases. He serves on a Rule 23 Subcommittee for the District of Columbia Rules Advisory Committee. Mr. Battin obtained his undergraduate degree in business from Old Dominion University (B.S. 1987) and his law degree from the College of William & Mary (J.D. 1990). He is a member of the bars of the District of Columbia, Virginia, and Missouri (inactive) and is also admitted to practice before the United States District Courts for the Eastern District of Virginia, Eastern District of Michigan and the District of Columbia, and the United States Courts of Appeals, Fourth and District of Columbia Circuits.

Nathan M. Cihlar

Mr. Cihlar is a partner in the Virginia office of Straus & Boies. Throughout his career, he has prosecuted complex and class action litigation with a focus on antitrust, consumer protection and product liability claims. Since joining the firm, Mr. Cihlar has been highly involved in the

litigation of numerous large, multi-faceted nationwide cases from inception to conclusion. He has served in prominent roles in the litigation of, among others, antitrust class actions against the manufacturers of Dynamic Random Access Memory, monosodium glutamate, oriented strand board, LCD panels, and Cathode Ray Tubes. Additionally, Mr. Cihlar currently serves as the trial planning committee chair in the Blue Cross Blue Shield antitrust litigation. Mr. Cihlar has significant experience with litigation involving international defendants and foreign language issues. He has served as foreign language discovery lead in both the LCD and CRT litigations. In doing so, he has successfully represented numerous plaintiff classes and helped recover hundreds of millions of dollars for consumers.

Mr. Cihlar obtained his bachelor's degree from Georgetown University (B.S. Finance and Marketing 1999), and his law degree from William & Mary Law School (J.D. 2004). He is admitted to practice in Virginia, the District of Columbia and before the United States District Court for the Eastern District of Virginia.

Mark J. Schirmer

Mr. Schirmer is a partner in the Tennessee office of Straus & Boies. He has approximately thirty years of experience prosecuting and defending civil and criminal actions arising out of complex business transactions in courts and before regulatory agencies throughout the country.

Mr. Schirmer served as Senior Trial Attorney in the Eastern Regional office of the U.S. Commodity Futures Trading Commission and served on a number of bar committees concerned with litigation involving financial professionals and financial transactions. He is admitted to the bars of New York and Tennessee, and is admitted to practice before the United States Courts of Appeals for the Fourth, Sixth and Eleventh Circuits, and the United States District Courts for the

Southern and Eastern Districts of New York, the Eastern District of Michigan and the Western District of Tennessee. He is a graduate of Fordham University's School of Law and Macalester College.

Christopher V. Le

Christopher Le is a partner in the Virginia office. Since joining Straus & Boies in 2007, Mr. Le has played key roles in numerous class cases, including LaPlant v. Northwestern Mutual Life Insurance Company, In Re Dynamic Random Access Memory Antitrust Litigation, In Re Processed Eggs Antitrust Litigation, In Re Packaged Seafood Antitrust Litigation, and In Re Broilers Chicken Antitrust Litigation. Mr. Le has particular experience with the antitrust issues involved in food and agriculture cases.

Mr. Le obtained his bachelor's degree from The University of Virginia (B.A. 2004) and his law degree from Case Western Reserve University (J.D. 2007, *cum laude*). While at Case Western, Mr. Le was a member of the Mock Trial and Negotiation Competition Teams. He is admitted to practice in Virginia and the District of Columbia. Mr. Le is fluent in French.

Barry Boughman

Mr. Boughman served as an Assistant United States Attorney for the District of Colorado from 1986 to 1988, when he entered private practice. He also served as Law Clerk for the Honorable Michael R. Enwall, District Court Judge for the 20th Judicial District in Boulder, Colorado from 1984 to 1985. He obtained his bachelor's degree from the University of Northern Colorado (B.A. 1980) and his law degree from the University of Colorado School of Law (J.D. 1984). He is admitted to practice in Colorado as well as before the United States Court of Appeals for the Tenth Circuit and the United States District Court for the District of Colorado.

Steven M. Feder

Mr. Feder obtained his bachelor's degree from Miami University (Ohio) (B.S. 1982) and his law degree from the University of Colorado School of Law (J.D. 1985, Order of the Coif). He is admitted to practice in Colorado and Illinois, as well as before the United States Supreme Court, the United States Court of Appeals for the Tenth Circuit, and the United States District Courts for the Districts of Colorado and Connecticut. He served as a prosecutor in Colorado's Eighteenth Judicial District from 1985 to 1990, before entering private practice.

Shinae Kim-Helms

Ms. Kim-Helms is a partner and represents consumers and businesses in cases involving price fixing, monopolization, and other anticompetitive practices. Prior to joining Straus & Boies LLP, Ms. Kim-Helms worked on cases involving patent and trademark infringement. Since joining the firm in 2010, Ms. Kim-Helms has been involved in litigating cases against the manufacturers of LCD panels, cathode ray tubes, lithium ion batteries, and auto parts.

Ms. Kim-Helms obtained her bachelor's degree from Seoul National University (B.S. Agrobiology), her master's degree from Yonsei University (M.S. Biochemistry) and her law degree from Golden Gate University, School of Law (J.D. 2005). Ms. Kim Helms' article on licensing agreements was published in Les Nouvelles, a quarterly licensing journal published by the Licensing Executives Society. Ms. Kim-Helms is fluent in Korean and Japanese. She is admitted to practice in California and before the United States District Court for the Northern District of California and the United States Patent and Trademark Office.

Joshua Callister

Mr. Callister is an associate attorney working in the Fairfax, Virginia office. He practices primarily in complex antitrust cases, and has experience in both government regulatory work and

complex litigation.

Prior to joining the firm in 2018, Mr. Callister worked as a director with a non-profit organization in Washington D.C. focused on developing relationships between the United States and the Middle East. Since joining the firm, he has worked on the Blue Cross Blue Shield, Broilers Chicken, and Packaged Seafood antitrust litigations. A 2016 graduate of the George Washington University Law School, Mr. Callister had the opportunity to clerk with a leading D.C. regulatory firm, during which time he co-authored an article published in the Food and Drug Law Institute, and previously consulted on multi-year complex litigation involving U.S. sugar growers and high fructose corn syrup manufacturers. Mr. Callister speaks Japanese.

Scott M. Dinner (former)

Mr. Dinner was an associate attorney working in the Virginia office. He practiced complex and class action litigation with a primary focus on antitrust claims. Mr. Dinner joined the firm in 2013 following his graduation from the University of Virginia School of Law. While in law school, Mr. Dinner was a quarterfinalist in the William Minor Lile Moot Court Competition. During this time, he also received numerous awards for his research and writing skills, including the Fulbright & Jaworksi Best Memo Award and the McGuireWoods Best Brief Award.

Carla Voigt (former)

Ms. Voigt was an associate attorney working in the Virginia office. She practiced complex and class action litigation with a primary focus on antitrust claims. Ms. Voigt joined the firm in 2014 following her graduation from the George Washington University Law School. While in law school, Ms. Voigt was a quarterfinalist in the First Year Negotiations Skills Competition. She also served as a Dean's Fellow, was a managing editor of the Federal

Communications Law Journal, and has an article published in that journal. She is admitted to practice in Virginia and the District of Columbia.

Partial List of Recent Cases In Which Straus & Boies, LLP Has served As Lead Counsel

Dynamic Random Access Memory (DRAM)

Straus & Boies, LLP, served as co-lead counsel in these coordinated multi-state proceedings against the manufacturers of Dynamic Random Access Memory chips (DRAM) for the violation of various state's antitrust/consumer protection laws. It was alleged that the DRAM manufacturers entered into and engaged in a conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of DRAM. Straus & Boies, LLP prosecuted the claims of indirect purchasers of DRAM since October 2004. Through the work of Straus & Boies, LLP and its co-lead counsel, indirect purchasers were able to reach settlements with all defendants totaling more than $300 million. These settlements were approved by the United States District Court for the Northern District of California in June 2016.

Northwestern Mutual Life Insurance Annuity Litigation

Straus & Boies served as co-lead counsel on behalf of thousands of purchasers of Northwestern Mutual Life Insurance Company ("Northwestern") annuities. The lawsuit accused Northwestern of deliberately stripping annuity policyholders of their dividend rights. Straus & Boies litigated the case in multiple jurisdictions. The case went to trial, where Straus & Boies' clients won a verdict on all material issues. Ultimately, the case settled for $84 million.

Vitamins

As lead counsel in coordinated multi-state proceedings of more than 50 indirect purchaser classes and *parens patriae* actions filed in 23 separate state jurisdictions against the international manufacturers of bulk vitamins, Straus & Boies negotiated and finalized a series of settlements with the defendants. The first settlement secured by Straus & Boies was at that time the largest

ever indirect purchaser antitrust settlement. Straus & Boies's efforts in successfully resolving the state vitamins indirect purchaser actions included structuring, implementing, and leading coordinated alternative dispute resolution proceedings sanctioned by state courts throughout the country, and involving scores of plaintiffs' counsel, numerous counsel for foreign and domestic defendants, and the State Attorneys General.

Food Additives

As sole lead counsel for more than 10 indirect purchaser state class action claims filed across the country, Straus & Boies effectively advanced the claims of indirect purchasers against the manufacturers of food additives for an illegal price-fixing conspiracy that affected consumer prices for well over a decade. The cases allege that the major manufacturers of certain food additives conspired to fix prices during the period January 1, 1990 through 2002. Straus & Boies received final approval of a global settlement which provided millions to the affected class members.

Eggs

Straus & Boies, LLP was co-lead counsel of indirect purchasers across the country and in 17 jurisdictions alleging a conspiracy to fix the prices of eggs. This litigation involved complicated claims related to cage space restrictions in a multi-billion dollar industry.

Partial List of Other Actions
Prosecuted by Straus & Boies

Antitrust Actions

Blue Cross Blue Shield

1. *In re: Blue Cross Blue Shield Antitrust Litigation, No. 2:13-cv-20000-RDP (N.D. Ala.).*

   Straus & Boies, LLP has been involved in ongoing representation of plaintiff subscribers of the Individual Blue Plans including 60 defendants from across the nation, as well as the Blue Cross Blue Shield Association. Partners of our firm serve prominent roles, including chair of the trial planning committee. This action seeks to recover damages for classes of subscribers caused by an ongoing conspiracy amongst the Blues to allocate markets in violation of the Sherman Act.

Broilers Chicken

2. *In re: Broiler Antitrust Litigation, No. 1:16-cv-08637 (N.D. Ill.).*

   Straus & Boies, LLP has been involved in ongoing representation of commercial and institutional indirect purchaser plaintiffs against broiler chicken producers for conspiring to fix, raise, maintain and stabilize the price of broiler chicken meat sold in the United States since as early as January 1, 2008. Broilers sold in the United States are controlled by a small number of large producers all of which are involved with this conspiracy.

Packaged Seafood

3. *In re: Packaged Seafood Products Antitrust Litigation, No. 3:15-md-02670-JLS-MDD (S.D. Cal.).*

   Straus & Boies, LLP has been involved in ongoing representation of end-payer plaintiffs against major canned tuna fish manufacturers, including Bumble Bee Foods LLC,

StarKist Company, and Tri-Union Seafoods LLC for conspiring to fix the prices of tuna sold in the United States beginning on August 1, 2008 in violation of the Sherman Act and of the Clayton Act. Defendants agreed to artificially increase prices in spite of falling consumer demand, which continues to harm plaintiffs today.

Monosodium Glutamate

4. *Ashley v. Archer Daniels Midland Co., et al*., Circuit Court of DeKalb County, Alabama, CV-95-336, **Co-lead Counsel**.

5. *Caldwell, et al. v. Archer Daniels Midland Co., et al.,* Circuit Court of Coosa County, Alabama, Civil Action No. CV-96-17, **Co-lead Counsel**.

6. *Madelon J. Lief, et al. v. Archer Daniels Midland Co.*, Circuit Court of Dan County, Wisconsin, Civil Docket No. 02CV3697.

Vitamins

7. *Donaldson, et al. v. Degussa Huls Corporation, et al.,* Circuit Court of Cullman Co. Alabama, C.A. No. 99-406, **Co-lead Counsel**.

8. *Giral, et al. v F. Hoffman LaRoche Ltd., et. al.*, Superior Court of the District of Colombia, Civil Division, Case No. 0007467-98, **Lead Counsel**.

9. *Graham v. Hoffman LaRoche, et al.,* Superior Court for the State of California, County of Yolo, No. CV 98-00046, J.C.C.P. No. 4076, **Executive Committee**.

10. *Shaklee Corp. v. Degussa-Huls Corp, et al.,* Superior Court of San Francisco County, California, Case No. 308636, J.C.C.P. Nos. 4090 and 4096.

11. *In re Vitamins Antitrust Litigation,* United States District Court for the District of Columbia, MDL 1285, **Executive Committee and Liaison Counsel**.

Pharmaceuticals

12. *In re Brand-Name Prescription Drugs Antitrust Litigation*, United States District Court for the Northern District of Illinois, MDL 997.

13. *In re Ciprofloxacin Hydrochloride Antitrust Litigation*, United States District Court for the Eastern District of New York, MDL 1383.

14. *Drug Mart Pharmacy Corporation v. Abbot Laboratories, et al*., Supreme Court of the State of New York, County of Kings, No. 29126-99.

15. *Durrett v. The Upjohn Co., et al.,* Circuit Court of Tuscaloosa County, Alabama, Civil Action No. CV-97-170, **Co-lead Counsel**.

16. *Goda, et al. v. Abbott Laboratories, Inc.,* Superior Court for the District of Columbia, Civil Docket No. 01445-96.

17. *Holdren, et al. v. Abbott Laboratories, Inc.,* District Court of Johnson County, Kansas, Case No. 96C15994.

18. *Huggins, et al. v. Abbott Laboratories, Inc., et al.,* Circuit Court for Chambers County, Alabama, Case No. CV-96-024-Cl.

19. *Karofsky v. Abbott Laboratories, Inc., et al.,* Superior Court of Cumberland County, Maine, Civil Docket No. 95-1009.

20. *Kerr v. Abbott Laboratories, Inc., et al.,* District Court of Hennepin County, Minnesota, No. MC-96-002837.

21. *Long v. Abbott Laboratories, Inc., et al.,* General Court of Justice Superior Court Division for Mecklenburg County, North Carolina, Civil Action No. 97 CVS 8289.

22. *McLaughlin, et al. v. Abbott Laboratories, Inc.,* Superior Court for Yavapai County, Arizona, No. 1-CA-SA-96-0215.

23. *Meyers v. Abbott Laboratories, Inc., et al.,* Circuit Court for Davidson County, Tennessee, No. 970612.

24. *Scholfeld v. Abbott Laboratories, Inc., et al.,* District Court for Dane County, Wisconsin, No. 96-CV-0460.

25. *Wood v. Abbott Laboratories, Inc., et al.,* Circuit Court of Oakland County, Michigan, No. 96-5125610CZ.

26. *Yasbin, et al. v. Abbott Laboratories, Inc.,* Circuit Court for the Eleventh Judicial District for Dade County, Florida, C.A. No. 97-1141-CA 03.

Vitamin C

27. *Audette v. Hebei Welcome Pharmaceutical Co. Ltd., et al.,* Commonwealth of Massachusetts, Case No. 2005-00182-C.

28. *In re Vitamin C Antitrust Litigation,* United States District Court for the Eastern District of New York, MDL No. 1738, **Co-Lead Counsel**.

Polyester

29. *Augusta Sullivan and Rose Marie Farina v. Wellman, Inc., et al.*, Commonwealth of Massachusetts, Case No. 02-4872 C.

30. *Briscoe, et al. v. DuPont E.I. Nemours & Co., et al.,* Superior Court for the District of Columbia, C.A. No. 02ca0010508.

31. *Polyester Staple Cases*, Superior Court of California, Judicial Council Coordination Proceeding No.: JCCP No. 4278.

32. *Thomaston Mills, Inc., et al. v. DuPont E.I. Nemours & Co., et al.*, United States District Court for the Western District of North Carolina, Civil Action No. 3:02-CV-474-V.

DRAM Microchips

33. *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation,* United States District Court for the Northern District of California, MDL No. 1486, **Co-Lead Counsel**.

34. *Hamilton v. Elpida Memory Inc., et al,* Commonwealth of Massachusetts, County of Suffolk, The Superior Court, Case No. 04-3264.

Air Industry

35. *In re Air Cargo Shipping Services Antitrust Litigation,* United States District Court for the Eastern District of New York, Case No. 06-MD-1775.

36. *In re American Airlines Antitrust Litigation,* United States District Court for the District of Kansas, Case No. 99-1187-MLB, **Chair of Executive Committee**.

37. *In re International Air Transportation Surcharge Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 06-cv-1793.

38. *McCoy-Johnson, et al. v. Northwest Airlines, Inc. and Northwest Airlines Corp.,* United States District Court for Western District of Tennessee, Western Division, No. 99-2994 GV, **Chair of Executive Committee**.

Aspartame

39. *In re Aspartame Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, No. 06-CV-1732, **Co-lead Counsel.**

Intel

40. *Dressed to Kill Custom Draperies v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3272.

41. *In re Intel Corporation Microprocessor Antitrust Litigation,* United States District Court for the District of Delaware, C 05 485

42. *Juan v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3271.

43. *Kinder v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3273.

44. *Rush v. Intel Corp.*, United States District Court for the Northern District of California C 05 3277.

Microsoft

45. *Crain v. Microsoft Corporation*, *et al*., Superior Court for the State of California, County of Yolo, No. CV 99-1740, J.C.C.P. No. 4106.

46. *Dunham v. Microsoft Corporation, et al.*, Superior Court of the State of California, County of Sonoma, No. 223291, J.C.C.P. No. 4106.

47. *Saams, et al. v. Microsoft Corporation, et al*., Superior Court for the State of California, County of San Francisco, CV 308015, J.C.C.P. No. 4106.

Other Products and Industries

48. *In re Disposable Contact Lens Antitrust Litigation*, United States District Court for the Middle District of Florida, Jacksonville Division, MDL 2626.

49. *In re Lithium Ion Batteries Antitrust Litigation*, United States District Court for the Northern District of California, Oakland Division, MDL 2420.

50. *In re Automotive Parts Antitrust Litigation,* United States District Court for the Eastern District of Michigan, Southern Division, Case No. 12-cv-2311.

51. *In re Cathode Ray Tube (CRT) Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 07-cv-5944.

52. *In re Citric Acid Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1092.

53. *In re Commercial Tissue Products*, United States District Court for the Northern District of Florida, Gainesville Division, MDL 1189, Case No. 97-CV-128.

54. *In re Flash Memory Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 07-cv-086.

55. *In re Foreign Currency Conversion Fee Antitrust Litigation*, United States District Court for the Southern District of New York, MDL 1409.

56. *In re High Fructose Corn Syrup Antitrust Litigation*, United States District Court for the Central District of Illinois, MDL 1087.

57. *In re Methionine Antitrust Litigation,* United States District Court for the Northern District of California, MDL 1311.

58. *In re Online DVD Rental Antitrust Litigation*, Unites States District Court for the Northern District of California, MDL 2029.

59. *In re OSB Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, Case No. 06-826, **Co-lead Counsel.**

60. *In re Processed Egg Products Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, Case No. 08-md-2002, **Co-lead Counsel**.

61. *In re Refrigerant Compressors Antitrust Litigation*, United States District Court for the Eastern District of Michigan, Case No. 2:09-02042.

62. *Robbins, LLC v. Cabot Corporation, et al.*, United States District Court for the District of Massachusetts, Case No. 03-CV-11072DPW.

63. *Seven Up Bottling Company of Jasper, Inc. v. Archer Daniels Midland Co., et al.,* Circuit Court of Walker County, Alabama, Civil Action No. 95-436, **Co-lead Counsel**.

64. *In re Static Random Access Memory (SRAM) Antitrust Litigation,* United States District Court for the Northern District of California, Oakland Division, Case No. 07-cv-1819.

65. *In re TFT-LCD (Flat Panel) Antitrust Litigation,* United States District Court for the Northern District of California, San Francisco Division, Case No. 07-cv-1827.

66. *Thomas and Thomas Rodmakers, Inc., et al. v. Newport Adhesives and Composites, Inc. et al.* United States District Court Central Division, No. CV-99-07796-GHK (CTx).

67. *In re Hypodermic Products Antitrust Litigation,* United States District Court for the District of New Jersey, Case No. 05-cv-1602.

68. *In re Residential Telephone Lease Contract Litigation*, Southern District of Alabama, MDL 1165, **Co-lead Counsel**.

69. *Park Surgical Co. Inc., et al. v. Becton Dickinson & Company,* Civil Action No. 05 CV 5678 (E.D. Pa.)(CMR).

70. *Smith v. GTE Corp., et al.,* United States District Court for the Middle District of

Alabama, Case No. 97-M-1025, **Co-lead Counsel**.

71. *Southeast Missouri Hospital, Saint Francis Medical Center v. C.R. Bard Inc.,* United States District Court for the Eastern District of Missouri, Southeastern Division, Case No. 07-cv-031, **Co-lead Counsel.**

72. *Sparks, et al. v. AT&T Corporation, et al.,* Circuit Court, Third Judicial Circuit, Madison County, Illinois, Case No. 96-LM-983.

73. *Sparks, et al. v. Lucent Technologies, et al.,* Circuit Court, Third Judicial Circuit, Madison County, Illinois, Case No. 01-L-1668.

74. *Wilson v. Toys R Us, et al.*, Circuit Court of Tuscaloosa County, Alabama, Civil Action No. CV-96-574, **Co-lead Counsel**.

Securities Actions

75. *In re Alliance, Franklin/Templeton, Bank of America/Nation Funds, and Pilgrim Baxter [Franklin Templeton Subtrack] v. Sharkey Iro/Ira v. Franklin Resources, et al.,* United States District Court for the District of Maryland, Case No. 04-MD-15862.

76. *Casey v. Prudential Securities, Inc.,* Supreme Court of the State of New York, County of Albany, Index. No. 3462-97.

77. *In re Medpartners Securities Litigation*, United States District Court for the Northern District of Alabama, CV-98-B-0067-S.

78. *In re Mutual Funds Investment Litigation,* United States District Court for the District of Maryland, MDL 1586.

79. *In re NASDAQ Market-Makers Antitrust Litigation*, United States District Court for the Southern District of New York, MDL 1023.

80. *Milne v. Mercury Finance Co., et al.,* United States District Court for the Northern District of Illinois, No. 97-C-1536.

81. *Ronald Lankford v. Jos. A. Banks Clothiers, Inc.*, Circuit Court of Madison County, Alabama, Case No. CV03-204LHL.

82. *In re Vesta Insurance Group, Inc. Securities Litigation,* United States District Court for the Northern District of Alabama, CV 98-AR-1407-S, **Liaison Counsel**.

83. *Vivian Bernstein v. Janus Capital Management, LLC, et al.*, United States District Court, District of Colorado, Case No. 03-B-1798.

Products Liability Actions

84. *In re Bridgestone/Firestone, Inc. ATX, ATX II and Wilderness Tires Products Liability Litigation*, United Sates District Court for the Southern District of Indiana, Indianapolis Division, MDL 1373, (Tires).

85. *In re Cigarette Litigation,* United States District Court for the Northern District of Georgia, CV-0447 (MDL 1342).

86. *Hodge, et al. v. Eastman Chemical Company*, Circuit Court of Jefferson County, Tennessee, Civil Action No. 16.351 IV, **Co-lead Counsel**, (Photography Chemicals).

87. *Rampey v. Novartis Consumer Health, Inc.,* Circuit Court of Chambers County, Alabama, CV-97-174, **Co-lead Counsel**, (Ex-Lax).

88. *In re Zurn Pex Products Liability Litigation,* United States District Court for the District of Minnesota, Case No. 08-md-1958, **Class Counsel**.

Miscellaneous Actions

In addition to the above listed suits, Straus & Boies, LLP has been involved in numerous other fields of litigation:

89. ALCOHOL - Straus & Boies, LLP lead the fight against numerous alcoholic beverage manufacturers and distributors for illegally advertising to underage children. *Ayman R. Hakki, et al. v. Zima Company, et al.,* Superior Court for the District of Columbia, Case No. 1:03 CV 02621; *Randy Kreft and Colleen Kreft, et al. v. Zima Beverage Company, et al.,* District Court, City & County of Denver, Colorado, Case No. 03-CV-9229; *Ronald P. Wilson, Andrea B. Wilson and Joseph A. Wilson, et al. v. Zima Company, et al.,* Superior Court, County of Mecklenburg, State of North Carolina, Case No. 04-CV-626.

90. GENETICALLY MODIFIED CROPS – Straus & Boies, LLP has also been involved in litigation regarding broad contamination due to genetically modified crops. *Blades, et al. v. Monsanto Co.,* United States District Court for the Southern District of Illinois, CV 00-4034-DRH (soy); *In re Genetically Modified Rice Litigation*, United States District Court for the Eastern District of Missouri, No. 4:06-MD 1811 CDP (rice).

91. PAN AM VICTIMS – Straus & Boies, LLP represents family members of the victims of the terrorist act on Pan Am Flight 103. *Curtis W. Fisher, et al. v. Abdel Basset Ali Mohmed Al-Megrahi, et al.,* D.D.C. 04-02055 (HHK); *Lawrence P. Fisher II v. Great Socialist People's Libyan Jamahiriya, et al.*, D.D.C. 05-2454 (HHK).

92. *Care Pharmacies, Inc. v. Purdue Pharma, L.P., et al.,* United States District Court for the Southern District of New York, Case No. 04-CV-3890 (Class action alleging damages based on abuse of patent for OxyContin)

93. *Derek S. Lynn v. Hyundai Motor America, Inc.*, Circuit Court of Madison County, Alabama, Civil Action No. CV-03-412.

94. *In re FedEx Ground Package System, Inc. Employment Practices Litigation,* United States District Court for the Northern District of Indiana, South Bend Division, Case No. 05-MD-527.

95. *In re Humana, Inc. Managed Care Litigation,* United States District Court for the Southern District of Florida, MDL 1334, **Executive Committee**. (Class action against managed-health care organizations for nonpayment).

96. *Marleen M. LaPlant v. The Northwestern Mutual Life Insurance Company*, State of Wisconsin, Circuit Court, Milwaukee County, Case No. 08-cv-011988, **Co-lead Counsel.**

97. *Poulos, et al. v. Caesar's World, Inc., et al.,* United States District Court for the District of Nevada, CV-S-94-1126-DAE (RJJ) (Misrepresentation of odds in slot machines).

98. *Prewitt Enterprises, Inc., v. Organization of Petroleum Exporting Countries,* United States District Court for the Northern District of Alabama, Case No. CV-00-B-0865-S.

99. *Thomas Miller and Noel Collette v. Deluxe Corporation*, First Judicial District, District Court of Dakota County, Minnesota, Civil Action No. 19-CO-03-6487 (Checks Unlimited).

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation

STRAUS & BOIES, LLP

Billing Summary

March 1, 2017 through April 1, 2019

EXHIBIT B

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

Firm Name: Straus & Boies, LLP

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR
Nathan Cihlar (P)			99.10			4.00									103.10	$625.00	$64,437.50
Shinae Kim-Helms (A)			288.60			53.30					43.70				385.60	$465.00	$179,304.00
Shinae Kim-Helms (A) - doc review							86.70								86.70	$450.00	$39,015.00
Carla Voigt (A)			31.80			1.50					0.20				33.50	$395.00	$13,232.50
Joshua Callister (A)											0.80				0.80	$345.00	$276.00
SUB-TOTAL	**0.00**	**0.00**	**419.50**	**0.00**	**0.00**	**58.80**	**86.70**	**0.00**	**0.00**	**0.00**	**44.70**	**0.00**	**0.00**	**0.00**	**609.70**		**$296,265.00**
NON-ATTORNEYS																	
Anna Gooding (PL)			53.00			5.20	104.20				5.60				168.00	$205.00	$34,440.00
Elizabeth Miorin (PL)							30.10								30.10	$155.00	$4,665.50
Karen Yi (PL)			6.90				17.60								24.50	$170.00	$4,165.00
SUB-TOTAL	**0.00**	**0.00**	**59.90**	**0.00**	**0.00**	**5.20**	**151.90**	**0.00**	**0.00**	**0.00**	**5.60**	**0.00**	**0.00**	**0.00**	**222.60**		**$43,270.50**
GRAND TOTAL:	**0.00**	**0.00**	**479.40**	**0.00**	**0.00**	**64.00**	**238.60**	**0.00**	**0.00**	**0.00**	**50.30**	**0.00**	**0.00**	**0.00**	**832.30**		**$339,535.50**

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

STRAUS & BOIES, LLP

Detailed LiB Time

March 1, 2017 through April 1, 2019

Selection Criteria

Acti.Selection	Include: W□RK
Slip.Transaction Date	3/1/2017 - 4/1/2019
Time.Selection	Include: Abdelrashid; Adams; BWright; Bacaj; Baker; Bargnesi; Battin; Boies, III; Borek; Boughman; Brant; Callister; Carral; Carter; Chapman; Chen; Christensen; Cihlar; Clark; Coakley; Cone; Crabtree; Cuevas; Curtiss; Day; Dinner; Disbursement; Feder; Ghareeb; Glover; Gooding; Gross; Hare; Harris; HarrisK; Jamison; Johnson; Khan; Kight; Kim-Helms; Lalor; Lampiasi; Le; Lee; Li; Maddalena; Maddern; Maniscalco; McFarland; Mercer; Miorin; Molony; Morris; Moser; Mundy; Nester; Noh; □'Donnell; □tto; Pal; Palumbo; Paralegal; Parker; Radcliffe; Raynes; Rodkey; Rogers; Rosenberg; Sayah; Schirmer; Schultz; Scialabba; Siegel; Simpson; Siozious; Skinner; Song; Spoerl; Stenzel; Straus; Strock; Studebaker; Swartz-Zern; Tara; Taylor; Tcihlar; Topor; Tran; Tuttle; Voigt; VonBerg; Walsh; Welsh; White; Willett; Woodbury; Wright; Yi; Zemans; office mgr
Clie.Selection	Include: 244/Ion Batteries; 244/Ion Batteries(1); 244/Ion Batteries(2); 244/Ion Batteries(3); 244/Ion Batteries(4); 244/Ion Batteries(5); 244/Ion Batteries(6); 244/Ion Batteries(7); 244/Ion Batteries(8); 244/Ion Batteries(9); 244/Ion Battery (10); 244/Ion Battery (11); 244/Ion Battery (12); 244/Ion Battery (13); 244/Ion Battery(14)

Nickname 244/Ion Batteries(3) □Draft disc answ
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
Activity: W□RK					
3/1/2017 214945	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (0.40); conduct research for [redacted] (0.60).	435.00	1.00	435.00	Billable
3/2/2017 215149	Nathan Cihlar W□RK Analysis of literal translation by [redacted] to translations in [redacted] deposition (1.80); edit draft responses for accuracy (1.20).	585.00	3.00	1,755.00	Billable
3/3/2017 215150	Nathan Cihlar W□RK Analysis of literal translation proposed by [redacted] related to documents from [redacted] deposition (2.0); draft responses to objection to translations based on [redacted] (1.50).	585.00	3.50	2,047.50	Billable
3/6/2017 215152	Nathan Cihlar W□RK Analysis of literal translations related to objections from [redacted] deposition and defendants second response to our reply (2.0); propose and draft edit responses to defendant responses (2.5).	585.00	4.50	2,632.50	Billable
3/6/2017 215123	Carla Voigt W□RK Revise draft of plaintiffs' joint second responses to Defendants objections to translations entered in the [redacted] deposition per [redacted] edits.	340.00	2.00	680.00	Billable
3/7/2017 215151	Nathan Cihlar W□RK Analysis of literal translations related to second response from Defendants to translation objections from [redacted] and [redacted] depositions (2.0); draft and edit reply to the second response from Defendants related to same (2.0); meeting with C. Voigt to discuss [redacted] (0.40).	585.00	4.40	2,574.00	Billable
3/7/2017 215124	Carla Voigt W□RK Meeting wtih N. Cihlar regarding draft responses to [redacted] and defendants objections to translations (0.40); finalize plaintiffs' joint second responses to Defendants objections to translations entered in the [redacted] deposition (1.5); revise plaintiffs' joint second responses to Defendants objections to translations entered in the [redacted] (1.80); route both sets of second responses to N. Cihlar [redacted] (0.20).	340.00	3.90	1,326.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
3/8/2017 215078	Shinae Kim-Helms W□RK	435.00	3.70	1,609.50	Billable
	Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (1.70); review cited materials (0.50); prepare responses to said objections (1.50).				
3/9/2017 215081	Shinae Kim-Helms W□RK	435.00	4.10	1,783.50	Billable
	Review and analyze Defendants objections to Plaintiffs [redacted] (2.0); review cited materials (0.50); prepare responses to said objections (1.60).				
3/10/2017 215083	Shinae Kim-Helms W□RK	435.00	5.60	2,436.00	Billable
	Review and analyze Defendants objections to Plaintiffs [redacted] (3.0); review cited materials (0.50); prepare responses to said objections (1.50); e-mails with K. Yamada regarding [redacted] (0.40); e-mails with E. Miorin regarding [redacted] (0.20).				
3/13/2017 215084	Shinae Kim-Helms W□RK	435.00	5.00	2,175.00	Billable
	Review and analyze Defendants objections to Plaintiffs [redacted] (2.50); review cited materials (0.50); prepare responses to said objections (1.0); review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (0.50); review and revise draft responses prepared by [redacted] (0.50).				
3/14/2017 215087	Shinae Kim-Helms W□RK	435.00	3.00	1,305.00	Billable
	Review and analyze Defendants objections to Plaintiffs [redacted] (0.8); review cited materials (0.8); review and revise [redacted] draft responses (0.7) ; review and analyze [redacted] and objections thereto (0.5); prepare responses to same (0.2).				
3/15/2017 215089	Shinae Kim-Helms W□RK	435.00	1.20	522.00	Billable
	Review Sawai transcripts and exhibits entered by Defendants (0.5); e-mails with E. Miorin regarding [redacted] (0.2); review and finalize Plaintiffs responses to Defendants objections to [redacted] (0.5).				
5/1/2017 215559	Shinae Kim-Helms W□RK	435.00	4.00	1,740.00	Billable
	Review and analyze Defendants objections to [redacted] (1.50); draft responses to [redacted] (1.50); review cited materials (1.00).				
5/2/2017 215675	Anna Gooding W□RK	180.00	1.20	216.00	Billable
	Pull exhibits and check status for [redacted] per request of [redacted].				
5/3/2017 215647	Shinae Kim-Helms W□RK	435.00	3.60	1,566.00	Billable
	Legal analysis of Defendants objections to [redacted] (1.4); analyze cited materials and draft responses to [redacted] (2.2).				
5/5/2017 215650	Shinae Kim-Helms W□RK	435.00	4.70	2,044.50	Billable
	Legal analysis of Defendants objections to [redacted] (1.2); analyze cited materials and draft responses to [redacted] (1.8); finalize draft responses to same and prepare summary of [redacted] (1.6); forward same to [redacted] (0.1).				
5/8/2017 215652	Shinae Kim-Helms W□RK	435.00	4.50	1,957.50	Billable
	Legal analysis of Defendants objections to [redacted] (1.2); analyze cited materials (1.5); draft responses to said translation objections (1.8).				
5/8/2017 215682	Nathan Cihlar W□RK	585.00	1.60	936.00	Billable
	Analysis of our proposed responses to translation objections from [redacted] (0.60); draft/edit final responses and strategies (1.00).				
5/9/2017 215654	Shinae Kim-Helms W□RK	435.00	3.30	1,435.50	Billable
	Review translation objections to Japanese documents entered in [redacted]				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	depositions (0.5); e-mail to S. Nagano [redacted] (0.3); legal analysis of Defendants objections to Plaintiffs translations entered in [redacted] (1.2); analyze cited materials (0.5); draft responses to said translation objections (0.8).				
5/12/2017 215658	Shinae Kim-Helms W□RK Receive and briefly review Defendants objections to translations entered in [redacted] depositions (0.4); e-mails with V. Glaze and K. Yamada regarding same (0.3); legal analysis of Defendants objections to Plaintiffs translations entered in [redacted] and [redacted]h depositions (1.1); analyze cited materials (1.5); draft responses to said translation objections (0.8).	435.00	4.10	1,783.50	Billable
5/15/2017 215660	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to Plaintiffs translations entered in [redacted] and [redacted] depositions (0.8); draft responses to said translation objections (1.1).	435.00	1.90	826.50	Billable
5/16/2017 215662	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to Plaintiffs translations entered in [redacted] depositions (0.7); draft responses to said translation objections (0.4).	435.00	1.10	478.50	Billable
5/22/2017 215668	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] (0.1); review draft responses to same drafted by DPPs (0.3).	435.00	0.40	174.00	Billable
5/24/2017 215669	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
5/26/2017 215671	Shinae Kim-Helms W□RK Review Defendants objections to Plaintiffs translations entered in YW Chung deposition (0.2).	435.00	0.20	87.00	Billable
6/1/2017 216175	Shinae Kim-Helms W□RK E-mails with V. Glaze and C. Smith regarding [redacted] (0.3).	435.00	0.30	130.50	Billable
6/5/2017 216174	Shinae Kim-Helms W□RK Review and legal analysis of Defendants objections to Plaintiffs translations entered in [redacted] deposition (1.4); draft responses to same (2.2).	435.00	3.60	1,566.00	Billable
6/19/2017 216183	Shinae Kim-Helms W□RK Review and draft literal responses to Defendants objections to translations entered in [redacted] depositions (1.1); prepare summaries of said objections (0.4).	435.00	1.50	652.50	Billable
6/26/2017 216241	Nathan Cihlar W□RK Meeting with C. Voigt regarding [redacted] (1.00); review, edit and legal analysis of responses to translation objections from □h deposition (3.00); teleconference with S. Kim-Helms regarding [redacted] (0.20).	585.00	4.20	2,457.00	Billable
6/26/2017 216199	Carla Voigt W□RK Meeting with N. Cihlar regarding [redacted] (1.00); review and revise Plaintiffs' joint responses to objections to exhibits entered in the [redacted] and [redacted] depositions to include all suggestions by [redacted] (2.00).	340.00	3.00	1,020.00	Billable
6/27/2017 216186	Shinae Kim-Helms W□RK Teleconference and e-mails with N. Cihlar regarding [redacted] (0.3); review Plaintiffs final responses to Defendants translation objections regarding [redacted] and [redacted] and determine translations ready to be re-certified (0.5); e-mail to A. Gooding regarding [redacted] (0.2).	435.00	1.00	435.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
6/27/2017 216200	Carla Voigt W□RK	340.00	2.20	748.00	Billable
	Review, edit and finalize Plaintiffs' joint responses to objections to exhibits entered in the [redacted] and [redacted] depositions pursuant to edits proposed by [redacted] and [redacted] (1.70); meeting with N. Cihlar regarding [redacted] (0.50).				
6/27/2017 216242	Nathan Cihlar W□RK	585.00	4.60	2,691.00	Billable
	Review, edit and strategize for responses to translation objections from documents entered in [redacted] (3.60); meeting with C. Voigt regarding [redacted] (0.40); circulate emails to lead counsel and DPPs describing [redacted] (0.60).				
6/28/2017 216195	Anna Gooding W□RK	180.00	1.60	288.00	Billable
	Prepare documents for [redacted] per request of [redacted].				
6/30/2017 216196	Anna Gooding W□RK	180.00	0.20	36.00	Billable
	Send documents for [redacted] per request of [redacted].				
7/5/2017 216548	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Finalize recertified translations (0.4); upload and replace existing translations with recertified translations (0.4); update master tracking list (0.2) per request of [redacted].				
7/5/2017 216514	Shinae Kim-Helms W□RK	435.00	1.70	739.50	Billable
	Review translations recertified by [redacted] (0.3); edit responses to translation objections from [redacted] and [redacted] depositions to include [redacted] edits and send same to [redacted] counsel along with recertified translations (0.9); update master translation tracking chart (0.5).				
7/6/2017 216562	Carla Voigt W□RK	340.00	5.90	2,006.00	Billable
	Review and revise Plaintiffs' first responses to [redacted] translation objections (2.70); review and revise Plaintiffs' first responses to [redacted] translation objections (2.20); Review and revise Plaintiffs' first responses to [redacted] translation objections (1.00).				
7/9/2017 216573	Nathan Cihlar W□RK	585.00	0.60	351.00	Billable
	Meetings with C. Voigt regarding [redacted].				
7/9/2017 216564	Carla Voigt W□RK	340.00	2.20	748.00	Billable
	Edit, revise plaintiffs' joint responses to objections to translations entered in the Sawai deposition (1.60); meeting with N. Cihlar regarding [redacted] (0.60).				
7/19/2017 216535	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	Receipt and brief review of Defendants objections to Plaintiffs translations entered in [redacted] depositions and (0.4).				
7/25/2017 216558	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Forwarding deposition exhibits for objection related purposes per request of [redacted].				
7/26/2017 216574	Nathan Cihlar W□RK	585.00	2.20	1,287.00	Billable
	Review, strategize and edit draft response to objections to translations from depositions of [redacted] and [redacted]				
7/27/2017 216575	Nathan Cihlar W□RK	585.00	3.20	1,872.00	Billable
	Review, strategize and edit draft responses to objections to translations from deposition of [redacted] (2.90); teleconference with [redacted] regarding [redacted] (0.30).				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
7/28/2017 216571	Carla Voigt W□RK Finalize draft of Plaintiffs' joint responses to Defendants objections to translations entered in the depositions of [redacted].	340.00	1.50	510.00	Billable
7/28/2017 216576	Nathan Cihlar W□RK Review, strategize and edit draft responses to objections to translations from depositions of [redacted] (3.50); finalize draft responses and prepare for circulation (0.80); draft summary email and circulate to [redacted] (0.90).	585.00	5.20	3,042.00	Billable
8/1/2017 216790	Shinae Kim-Helms W□RK Review final draft responses to Defendants objections to translations entered in [redacted] and select translations ready for re-certification (0.7); receive and review DAPs analysis and draft responses to Defendants objections to plaintiffs translations entered in [redacted] deposition and e-mails with L. Chan and V. Glaze regarding [redacted] (1); review and legal analysis of Defendants responses to Plaintiffs responses to translation objections regarding [redacted] (2.8).	435.00	4.50	1,957.50	Billable
8/1/2017 216840	Karen Yi W□RK Prepare documents for recertification (0.70).	155.00	0.70	108.50	Billable
8/1/2017 216828	Anna Gooding W□RK Finalize recertified translations (0.8); update master tracking list per request of [redacted] (0.3).	180.00	1.10	198.00	Billable
8/3/2017 216830	Anna Gooding W□RK Check if exhibits were previously entered (0.7); pull exhibits for objection related purposes per request of [redacted] (0.3).	180.00	1.00	180.00	Billable
8/3/2017 216793	Shinae Kim-Helms W□RK Review of Defendants objections to Plaintiffs translations entered in [redacted] and e-mails with A. Gooding regarding [redacted] (0.6); review and legal analysis of Defendants responses to Plaintiffs responses to translation objections regarding [redacted] and draft proposed responses to same and provide supporting arguments (2.1).	435.00	2.70	1,174.50	Billable
8/4/2017 216797	Shinae Kim-Helms W□RK Revise and finalize draft responses to Defendants responses to Plaintiffs responses to translation objections regarding [redacted] and draft proposed responses to same and provide supporting arguments (2.1).	435.00	2.10	913.50	Billable
8/7/2017 216799	Shinae Kim-Helms W□RK Finalize Plaintiffs responses to Defendants objections to translations entered in [redacted] to include edits from [redacted] (0.7); review finalized recertified translations for accuracy (0.3); serve same to Defendants (0.2).	435.00	1.20	522.00	Billable
8/8/2017 216832	Anna Gooding W□RK Upload newly finalized recerts (0.4); replace [redacted] (0.4); update master tracking list per request of [redacted] (0.2).	180.00	1.00	180.00	Billable
8/9/2017 216803	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses to said objections (1.3).	435.00	1.30	565.50	Billable
8/10/2017 216804	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses to said objections (1.4).	435.00	1.40	609.00	Billable
8/11/2017 216808	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft	435.00	1.70	739.50	Billable

244/Ion Batteries(3): (continued)

Date ID	Timekeeper Task	Rate Markup □	Hours DNB Time	Amount DNB Amt	Total
	responses to said objections (1.2); e-mails with K .Yi regarding [redacted] (0.5).				
8/14/2017 216810	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses to said objections (1.7).	435.00	1.70	739.50	Billable
8/15/2017 216812	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] (0.2); review and finalize draft responses to Defendants objections to translations entered in [redacted] depositions (1.8); legal analysis of Defendants objections to translations entered in [redacted] depositions (2); review and analysis of cited materials and other related materials (1.3); draft responses to said objections (1.1).	435.00	6.40	2,784.00	Billable
8/16/2017 216814	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses to said objections (2.6).	435.00	2.60	1,131.00	Billable
8/18/2017 216816	Shinae Kim-Helms W□RK Review status of Plaintiffs responses to Defendants objections to translations submitted with [redacted] (0.5); e-mails with S. Nagano regarding [redacted] (0.2); review translations cited in Defendants objections to translations entered in [redacted] depositions (1); legal analysis of Defendants objections to translations entered in [redacted] depositions (1.7); draft proposed responses to said objections (1.8).	435.00	5.20	2,262.00	Billable
8/18/2017 216834	Anna Gooding W□RK [redacted] (0.7); pull exhibits for [redacted] purposes (0.5); compare previously entered exhibits per request of [redacted] (0.8).	180.00	2.00	360.00	Billable
8/22/2017 216820	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses to said objections (1.4).	435.00	1.40	609.00	Billable
8/23/2017 216821	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions (1.5); review and analysis of cited materials and other related materials (2.4); revise and finalize responses to said objections (2.6).	435.00	6.50	2,827.50	Billable
8/24/2017 216823	Shinae Kim-Helms W□RK Evaluate [redacted] of Defendants translation objections regarding [redacted] (0.2); legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed Plaintiffs responses to said objections (3.1).	435.00	3.30	1,435.50	Billable
8/25/2017 216824	Shinae Kim-Helms W□RK Review translations cited in Defendants objections to translations entered in [redacted] depositions (1); e-mails with K. Yi regarding [redacted] (0.5); e-mails with S. Nagano regarding [redacted] (0.4); legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed Plaintiffs responses to said objections (2.5).	435.00	4.40	1,914.00	Billable
8/28/2017 216846	Karen Yi W□RK Review certified translation for [redacted] (0.50); e-mail correspondence with translation company regarding [redacted] (0.20); review second revision per request of [redacted] (0.20).	155.00	0.90	139.50	Billable
8/29/2017 216855	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] (0.3); legal analysis of Defendants objections to translations entered in [redacted] depositions (1.2).	435.00	1.50	652.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
8/29/2017 216847	Karen Yi W□RK	155.00	1.70	263.50	Billable
	Edit translated document with page numbers and send documents for correction (1.50); upload file to [redacted] (0.10); update master tracking list with recent translations (0.10).				
8/30/2017 216856	Shinae Kim-Helms W□RK	435.00	2.30	1,000.50	Billable
	Review informal translation prepared by S. Nagano to be submitted with Plaintiffs responses to Defendants [redacted] translation objections (0.3); legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed Plaintiffs responses to said objections (2).				
9/1/2017 216861	Shinae Kim-Helms W□RK	435.00	5.50	2,392.50	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.2); review and analysis of cited materials and other related materials (2.5); prepare summary of issues pertaining to Defendants [redacted] translation objections (0.7); forward same to N. Cihlar for [redacted] (0.1).				
9/5/2017 217034	Shinae Kim-Helms W□RK	435.00	2.80	1,218.00	Billable
	Prepare and provide N. Cihlar with [redacted] (0.4); e-mails with K. Yi to [redacted] (0.2); legal analysis of Defendants objections to translations entered in [redacted] depositions and draft proposed responses (2.2).				
9/6/2017 217019	Karen Yi W□RK	155.00	0.20	31.00	Billable
	Send documents for [redacted] (0.10); update master tracking list with [redacted] (0.10).				
9/7/2017 217020	Karen Yi W□RK	155.00	0.40	62.00	Billable
	Review certified translations for [redacted] per request of [redacted] (0.30); Email correspondence with translation company regarding [redacted] (0.10).				
9/8/2017 217022	Karen Yi W□RK	155.00	0.60	93.00	Billable
	Update master tracking list with [redacted] (0.30); Code recent translations on [redacted] (0.20); upload recent translation to [redacted] upload site (0.10).				
9/15/2017 217062	Nathan Cihlar W□RK	585.00	2.60	1,521.00	Billable
	Draft, edit and provide responses to various objections to translations from [redacted] and [redacted] depositions.				
9/18/2017 217063	Nathan Cihlar W□RK	585.00	3.80	2,223.00	Billable
	Draft, edit and provide responses to various objections to translations from [redacted] and [redacted] depositions.				
9/20/2017 217048	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	E-mails with N. Cihlar and E. Tran regarding [redacted] (0.5).				
9/20/2017 217064	Nathan Cihlar W□RK	585.00	4.30	2,515.50	Billable
	Finalize draft responses to objections to translations from [redacted] and [redacted] depositions, and circulate to lead counsel.				
9/21/2017 217028	Anna Gooding W□RK	180.00	3.80	684.00	Billable
	Prepare and send documents for [redacted] per request of [redacted].				
9/21/2017 217050	Shinae Kim-Helms W□RK	435.00	1.10	478.50	Billable
	Review and finalize final draft responses to Defendants objections to translations entered in [redacted] and [redacted] depositions to identify those needing recertification (0.9); e-mail with N. Cihlar regarding [redacted] (0.2).				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
9/26/2017 217054	Shinae Kim-Helms W□RK	435.00	4.60	2,001.00	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.2); draft proposed responses to said objections (2.2); circulate final responses to objections of [redacted] and [redacted] to defendants (0.2).				
9/27/2017 217029	Anna Gooding W□RK	180.00	1.50	270.00	Billable
	Check revisions (0.4); email correspondence with translation company regarding [redacted] (0.2); finalize certified translations (0.4); code translations on [redacted] (0.2); update master tracking list per request of [redacted] (0.3).				
9/27/2017 217056	Shinae Kim-Helms W□RK	435.00	2.90	1,261.50	Billable
	Circulate [redacted] to Defense counsel (0.2); legal analysis of Defendants objections to translations entered in [redacted] depositions (2.2); prepare summary of issues pertaining to said translation objection set (0.5).				
9/27/2017 217031	Carla Voigt W□RK	340.00	1.20	408.00	Billable
	Review and update [redacted] to reflect current status of all outstanding objection sets and analysis regarding same.				
9/28/2017 217057	Shinae Kim-Helms W□RK	435.00	5.80	2,523.00	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.8); review and analysis of cited materials and other related materials and research for supporting arguments (3).				
9/29/2017 217058	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	E-mails with S. Nagano regarding [redacted] (0.4).				
10/2/2017 217060	Shinae Kim-Helms W□RK	435.00	2.90	1,261.50	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (0.8); review and analysis of cited materials and other related materials and research for supporting arguments (1); draft literal translation to said objections (1.1).				
10/2/2017 217299	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Compare translations for objection related purposes per request of [redacted].				
10/3/2017 217259	Shinae Kim-Helms W□RK	435.00	8.90	3,871.50	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.8); review and analysis of cited materials and other related materials and research for supporting arguments (3); draft literal translation to said objections (3.1).				
10/5/2017 217262	Shinae Kim-Helms W□RK	435.00	5.00	2,175.00	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.2); review and analysis of cited materials and other related materials and research for supporting arguments (1.5); draft literal translations to said objections (1.3).				
10/12/2017 217369	Nathan Cihlar W□RK	585.00	1.90	1,111.50	Billable
	Draft, edit and provide final proposed responses to various objections to translations from [redacted] depositions (1.50); teleconference with [redacted] regarding [redacted] (0.40).				
10/12/2017 217274	Shinae Kim-Helms W□RK	435.00	3.10	1,348.50	Billable
	Legal analysis of Defendants objections to translations entered in [redacted] depositions (1.1); review and analysis of cited materials and other related materials and research for supporting arguments (1.2); identify issues pertaining to said [redacted] translation objection set and summarize [redacted] and discuss with [redacted] (0.8).				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
10/13/2017 217370	Nathan Cihlar W□RK Draft, edit and provide final proposed responses to various objections to translations from [redacted] depositions (3.40).	585.00	3.40	1,989.00	Billable
10/13/2017 217321	Karen Yi W□RK Review certified translations for [redacted] (0.30); email correspondence with translation company regarding [redacted] (0.20); upload certified translations to [redacted] (0.10); update master tracking list with [redacted] (0.10).	155.00	0.70	108.50	Billable
10/13/2017 217276	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions (1.2); review and analysis of cited materials and other related materials and research for supporting arguments (1).	435.00	2.20	957.00	Billable
10/16/2017 217322	Karen Yi W□RK Review certified translation for formatting accuracy (0.10); Email correspondence with translation company regarding formatting accuracy (0.10).	155.00	0.20	31.00	Billable
10/16/2017 217280	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] 0.3); legal analysis of Defendants objections to translations entered in [redacted] depositions (1.4); review and analysis of cited materials and other related materials and research for supporting arguments (1); teleconference with N. Cihlar regarding [redacted] (0.40).	435.00	3.10	1,348.50	Billable
10/16/2017 217371	Nathan Cihlar W□RK Draft, edit and provide final draft responses to various objections to translations from [redacted] and [redacted] depositions (4.30); teleconference with S. Kim-Helms regarding [redacted] (0.30).	585.00	4.60	2,691.00	Billable
10/17/2017 217324	Karen Yi W□RK Email correspondence with translation company regarding [redacted] (0.20).	155.00	0.20	31.00	Billable
10/17/2017 217283	Shinae Kim-Helms W□RK E-mails with S. Nagano regarding [redacted] (0.5); review exhibits entered in deposition of [redacted] and [redacted], cited in Defendants translation objections and e-mail to A. Gooding regarding [redacted] (1.5).	435.00	2.00	870.00	Billable
10/18/2017 217286	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] depositions (2.1); review and analysis of cited materials and other related materials and research for supporting arguments (2.2).	435.00	4.30	1,870.50	Billable
10/19/2017 217288	Shinae Kim-Helms W□RK Receive and review replacement copy of [redacted] exhibit prepared by [redacted]	435.00	0.40	174.00	Billable
10/20/2017 217326	Karen Yi W□RK Email correspondence with translation regarding [redacted] (0.30); review certified translation for [redacted] (0.40); email correspondence with translation company regarding [redacted] (0.20); finalize translations (0.40).	155.00	1.30	201.50	Billable
10/20/2017 217290	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations submitted with [redacted] (2.1); review and analysis of cited materials and other related materials and research for supporting arguments (1.7); draft suggestions for Plaintiffs responses to said objections (2.8).	435.00	6.60	2,871.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
10/23/2017 217372	Nathan Cihlar W□RK Finalize draft responses to objections to translations from [redacted] and [redacted] depositions, and circulate to lead counsel.	585.00	3.60	2,106.00	Billable
10/23/2017 217292	Shinae Kim-Helms W□RK Review finalized Plaintiffs responses to Defendants objections to translations entered in [redacted] and [redacted] depositions (0.8); prepare list of translations read for re-certification and e-mail to A. Gooding regarding [redacted] (0.4); legal analysis of Defendants objections to translations submitted with [redacted] (0.5); review and analysis of cited materials and other related materials and research for supporting arguments (1); draft and review draft Plaintiffs responses to said objections (0.8).	435.00	3.50	1,522.50	Billable
10/23/2017 217351	Carla Voigt W□RK Confer with N. Cihlar regarding [redacted] (0.20); update internal tracking chart and assess outstanding translation objection sets and timing for same (0.50).	340.00	0.70	238.00	Billable
10/24/2017 217314	Anna Gooding W□RK Prepare and send certified translations for [redacted] per request of [redacted]	180.00	3.10	558.00	Billable
10/24/2017 217335	Shinae Kim-Helms W□RK e-mails with B. Troxel regarding [redacted] (0.3); legal analysis of Defendants objections to translations entered in [redacted] (1.6); draft Plaintiffs proposed responses to said objections (1.5).	435.00	3.40	1,479.00	Billable
10/26/2017 217316	Anna Gooding W□RK Finalize recerts (0.6); update master tracking list (0.2); upload recerts per request of [redacted] (0.2).	180.00	1.00	180.00	Billable
10/27/2017 217373	Nathan Cihlar W□RK Teleconference with S. Kim-Helms regarding [redacted] (0.20).	585.00	0.20	117.00	Billable
10/27/2017 217341	Shinae Kim-Helms W□RK Review and finalize Plaintiffs' joint responses to Defendants' objections to the translations entered in the depositions of [redacted]; [redacted] and [redacted] and [redacted] and serve same to Defendants (0.90); teleconference with N. Cihlar regarding [redacted] (0.20).	435.00	1.10	478.50	Billable
10/31/2017 217346	Shinae Kim-Helms W□RK Summarize issues pertaining to Defendants objections to translations entered in [redacted] and send email to N. Cihlar.	435.00	0.80	348.00	Billable
11/1/2017 217898	Shinae Kim-Helms W□RK E-mail to S. Nagano regarding [redacted] (0.4); legal analysis of Defendants objections to translations entered in [redacted] deposition (1.6); review and analysis of cited materials and other related materials and research for supporting arguments (1.8).	435.00	3.80	1,653.00	Billable
11/2/2017 217900	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] deposition (2); review and analysis of cited materials and other related materials and research for supporting arguments (1.1).	435.00	3.10	1,348.50	Billable
11/7/2017 217901	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] deposition (1.6); review and analysis of cited materials and other related materials and research for supporting arguments (1.5); summarize issues pertaining to said translation objection set and e-mail [redacted] to N. Cihlar (1).	435.00	4.10	1,783.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
12/4/2017 218016	Nathan Cihlar W□RK Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] deposition.	585.00	5.50	3,217.50	Billable
12/5/2017 218017	Nathan Cihlar W□RK Draft, edit and provide final proposed responses to objections to translations from documents entered in the [redacted] deposition.	585.00	4.50	2,632.50	Billable
12/7/2017 217993	Shinae Kim-Helms W□RK Review final drafts of Plaintiffs responses to Defendants translation objection regarding [redacted] and [redacted] and select and review translations ready for [redacted] (0.5).	435.00	0.50	217.50	Billable
12/7/2017 218018	Nathan Cihlar W□RK Finalize responses to objection to translations spreadsheets for documents in [redacted] and [redacted] depositions (2.50); circulate same with explanation to lead counsel (0.40).	585.00	2.90	1,696.50	Billable
12/7/2017 218012	Carla Voigt W□RK Finalize spreadsheet of plaintiffs' first responses to objections to translations entered in the [redacted] and [redacted] depositions to incorporate all edits from [redacted] and route draft responses to [redacted] (2.00); update internal tracking chart (0.20).	340.00	2.20	748.00	Billable
12/8/2017 217994	Shinae Kim-Helms W□RK Teleconference and followup emails with [redacted] egarding translations ready for re-certification and review draft email prepared by [redacted] to request recertification (2.1); draft and propose modifications to final drafts of Plaintiffs responses to Defendants translation objection regarding [redacted] and [redacted] and discussion with N. Cihilar regarding [redacted] (1); review [redacted] deposition transcripts regarding [redacted] (0.5).	435.00	3.60	1,566.00	Billable
12/13/2017 217996	Shinae Kim-Helms W□RK Receive and review recertified translations delivered by [redacted] and e-mails with [redacted] regarding [redacted] (0.6); finalize Plaintiffs joint responses to Defendants objections to translations entered in [redacted] and [redacted] depositions and send final responses to Defense counsel (1); update Master [redacted] accordingly (0.8).	435.00	2.40	1,044.00	Billable
12/14/2017 217997	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] deposition in light of Defendants objections to translation entered in [redacted] deposition (1.2); review and analysis of cited materials and other related materials and research for supporting arguments (1.5); draft and review draft Plaintiffs responses to said objections (1); legal analysis of Defendants objections to translations entered in [redacted] deposition (2.2); review and analysis of cited materials and other related materials and research for supporting arguments (2.4); draft and review draft Plaintiffs responses to said objections (1.1).	435.00	9.40	4,089.00	Billable
12/14/2017 218007	Anna Gooding W□RK Upload recertified translations to [redacted] (0.2); update master tracking list with [redacted] (0.9).	180.00	1.10	198.00	Billable
12/18/2017 218000	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] deposition (2.1); review and analysis of cited materials and other related materials and research for supporting arguments (2); draft and review draft Plaintiffs responses to said objections (2.5).	435.00	6.60	2,871.00	Billable
12/22/2017 218001	Shinae Kim-Helms W□RK Legal analysis of Defendants objections to translations entered in [redacted] deposition (1.5); review and analysis of cited materials and other related materials and research for supporting arguments (0.5); draft and review draft Plaintiffs responses to said objections (1.5).	435.00	3.50	1,522.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
1/2/2018 218198	Shinae Kim-Helms W□RK	435.00	4.80	2,088.00	Billable
	Legal analysis of literal translation for Defendants' objections to translations entered in [redacted] deposition (2.3); review and analysis of cited materials and other related materials and research for supporting arguments (2.5).				
1/3/2018 218200	Shinae Kim-Helms W□RK	435.00	1.30	565.50	Billable
	Legal analysis of literal translation for Defendants' objections to translations entered in [redacted] deposition (0.8); review and analysis of cited materials and other related materials and research for supporting arguments (0.5).				
1/4/2018 218181	Carla Voigt W□RK	340.00	2.00	680.00	Billable
	Review and revise plaintiffs first responses to objections to translations entered with the IPP class cert reply brief and finalize internal notes version and clean version to send to defendants per [redacted] request (2.00).				
1/5/2018 218202	Shinae Kim-Helms W□RK	435.00	4.20	1,827.00	Billable
	Legal analysis of literal translation for Defendants' objections to translations entered in [redacted] deposition (2.3); review incompleteness of certified translations entered into [redacted] deposition and objected to by Defendants (1.4); review Defendants' objections to translations entered in [redacted] depositions and e-mails with A. Klamann regarding [redacted] (0.5).				
1/8/2018 218190	Anna Gooding W□RK	180.00	3.00	540.00	Billable
	Pull and [redacted] depo exhibits for objection related purposes per request of [redacted].				
1/8/2018 218204	Shinae Kim-Helms W□RK	435.00	5.00	2,175.00	Billable
	Receive and review Defendants' objections to translations entered in [redacted] deposition (0.5); legal analysis of Defendants' objections to translations entered in [redacted] deposition (2.3); review and analysis of previously entered exhibits and compare objections lodged to said previously entered exhibits (2.2).				
1/9/2018 218205	Shinae Kim-Helms W□RK	435.00	3.10	1,348.50	Billable
	Analyze issues pertaining to [redacted] translation objections and summarize same (0.5); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.1); review and analysis of cited materials and other related materials and research for [redacted] nts (1.5).				
1/10/2018 218191	Anna Gooding W□RK	180.00	6.20	1,116.00	Billable
	Reformat objected to translations and F□'s from [redacted] depo per request of [redacted].				
1/11/2018 218218	Nathan Cihlar W□RK	585.00	6.90	4,036.50	Billable
	Draft, edit and provide final proposed responses to objections to translations for documents in Plaintiffs Class Cert Reply and [redacted] Deposition (6.2); teleconference with S. Kim-Helms to discuss [redacted] (0.7).				
1/12/2018 218208	Shinae Kim-Helms W□RK	435.00	2.50	1,087.50	Billable
	Examine previously entered exhibits cited in [redacted] translation objections and previous objections (1.5); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1).				
1/12/2018 218184	Carla Voigt W□RK	340.00	2.50	850.00	Billable
	Complete review and revisions to spreadsheet for plaintiffs' first responses to objections to translations entered in the [redacted] deposition per [redacted] edits (2.50).				
1/15/2018 218219	Nathan Cihlar W□RK	585.00	4.50	2,632.50	Billable
	Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] Deposition (3.0); edit, draft excel spreadsheet for circulation to Defendants (1.5).				
1/16/2018 218185	Carla Voigt W□RK	340.00	2.00	680.00	Billable
	Confer with N. Cihlar regarding [redacted]				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] (0.80); review and revise [redacted] and route final materials to [redacted] to circulate (1.00); update internal tracking chart to reflect [redacted] (0.20).				
1/16/2018 218192	Anna Gooding W□RK Prepare and send translations for recertification per request of [redacted].	180.00	2.00	360.00	Billable
1/16/2018 218220	Nathan Cihlar W□RK Finalize response to objection to translations spreadsheets for documents in Class Cert Reply and [redacted] depositions (1.5); draft email with [redacted] to lead counsel and circulate [redacted] (0.8).	585.00	2.30	1,345.50	Billable
1/16/2018 218209	Shinae Kim-Helms W□RK Review and revise email to [redacted] requesting recertification of translations from [redacted] deposition and class certification reply with resolved objections, discussion with A. Gooding regarding same, prepare and send said request to [redacted] (1.8); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1); review and analysis of cited materials and other related materials and research for supporting arguments (0.8); summarize issues pertaining to said [redacted] translation objection responses and email to [redacted] (1).	435.00	4.60	2,001.00	Billable
1/17/2018 218210	Shinae Kim-Helms W□RK Analysis of previously entered exhibits cited in Defendants' objections to translations entered in [redacted] deposition (1.5); compare previous objections to said previously entered exhibits (0.5).	435.00	2.00	870.00	Billable
1/22/2018 218213	Shinae Kim-Helms W□RK Legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.3); review and analysis of cited materials and other related materials and research for supporting arguments (1.5).	435.00	2.80	1,218.00	Billable
1/22/2018 218186	Carla Voigt W□RK Update internal tracking chart to reflect [redacted] (0.30).	340.00	0.30	102.00	Billable
1/23/2018 218215	Shinae Kim-Helms W□RK E-mails with A. Gooding regarding re[redacted] and review same (0.6); review Defendants' objections to translated entered in [redacted] and [redacted] depositions and exhibits cited therein and discussion on exhibits previously entered with [redacted] (1.8).	435.00	2.40	1,044.00	Billable
1/23/2018 218187	Carla Voigt W□RK Receive draft responses for [redacted] translation objections and update internal tracking chart to reflect same (0.20).	340.00	0.20	68.00	Billable
1/23/2018 218194	Anna Gooding W□RK Reformat objected to depo exhibit per request of [redacted].	180.00	1.10	198.00	Billable
1/24/2018 218195	Anna Gooding W□RK Pull and compare depo exhibits for objection related purposes per request of [redacted].	180.00	1.50	270.00	Billable
1/25/2018 218216	Shinae Kim-Helms W□RK Receive and review finalized recertified files from [redacted] (0.5).	435.00	0.50	217.50	Billable
1/26/2018 218217	Shinae Kim-Helms W□RK Receive and review finalized recertified files from [redacted] (0.5); request corrections to recertified translations to [redacted] and review finalized files (0.3); send finalized recertified translations to Defendants (0.3).	435.00	1.10	478.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
1/29/2018 218196	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Update [redacted] chart (0.3); upload re-certified documents to [redacted] (0.2) per request of [redacted].				
2/7/2018 218325	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	Receive and review Defendants' correspondence on translation liaison counsel, prepare status report, and discussion with [redacted] regarding [redacted] (0.5).				
2/8/2018 218327	Shinae Kim-Helms W□RK	435.00	2.20	957.00	Billable
	Legal analysis of Defendants' objections to translations entered in [redacted] deposition (1); review and analysis of cited materials and other related materials and research for supporting arguments (1.2).				
2/12/2018 218328	Shinae Kim-Helms W□RK	435.00	2.80	1,218.00	Billable
	Legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.3); review and analysis of cited materials and other related materials and research for supporting arguments (1.5).				
2/13/2018 218330	Shinae Kim-Helms W□RK	435.00	5.10	2,218.50	Billable
	Legal analysis of Defendants' objections to translations entered in [redacted] deposition (2.3); review and analysis of cited materials and other related materials and research for supporting arguments (2.8).				
2/14/2018 218331	Shinae Kim-Helms W□RK	435.00	0.20	87.00	Billable
	Confer with A. Gooding regarding [redacted] (0.2).				
2/14/2018 218323	Anna Gooding W□RK	180.00	0.80	144.00	Billable
	Update depo exhibit list and [redacted] chart with [redacted] per request of [redacted].				
2/15/2018 218318	Nathan Cihlar W□RK	585.00	1.80	1,053.00	Billable
	Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] deposition (1.8).				
2/21/2018 218319	Nathan Cihlar W□RK	585.00	3.70	2,164.50	Billable
	Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] and [redacted] depositions (3.0); edit, draft excel spreadsheet with responses to same (0.7).				
2/21/2018 218333	Shinae Kim-Helms W□RK	435.00	3.40	1,479.00	Billable
	Discussion with S. Nagano regarding [redacted] (0.3); receive and review Defendants' objections to translations entered in deposition of SH □h (0.3); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.3); review and analysis of cited materials and other related materials and research for supporting arguments (1.5).				
2/22/2018 218320	Nathan Cihlar W□RK	585.00	1.60	936.00	Billable
	Draft, edit and finalize responses to objections to translation spreadsheets for documents submitted in [redacted] and [redacted] depositions (1.0); draft email with s[redacted] [redacted] to lead counsel and circulate [redacted] (0.6).				
2/22/2018 218324	Anna Gooding W□RK	180.00	4.00	720.00	Billable
	Prepare and send translations for recertification (2.3); draft email to DAPs explaining [redacted] (1.7).				
2/22/2018 218334	Shinae Kim-Helms W□RK	435.00	1.70	739.50	Billable
	Teleconference with A. Brown regarding [redacted]				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	(0.3); review and revise [redacted] (0.5); confer with A. Gooding to discuss [redacted] 0.4); review and revise recertified translation request prepared by A. Gooding (0.5).				
3/1/2018 218760	Anna Gooding W□RK Finalize [redacted] translations (0.6); update master tracking list per request of [redacted] (0.4).	205.00	1.00	205.00	Billable
3/1/2018 218774	Shinae Kim-Helms W□RK Review and finalize recertified translations (0.5); revise and finalize Plaintiffs' joint responses to Defendants' objections to the translations entered in the depositions of Messrs. [redacted] and [redacted] (0.5); submit same to Defense counsel along with re-certified translations (0.2); update master translation objection chart (0.5).	465.00	1.70	790.50	Billable
3/5/2018 218761	Anna Gooding W□RK Work with US Legal to replace old exhibits with newly recertified translations (0.6); [redacted] objected-to exhibits per request of [redacted] (1.3).	205.00	1.90	389.50	Billable
3/5/2018 218777	Shinae Kim-Helms W□RK Receive and review [redacted] exhibits prepared by [redacted] and e-mails with A. Gooding regarding [redacted] (0.6); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.3); review and analysis of cited materials and other related materials and research for supporting arguments (1.5); draft and finalize draft Plaintiffs' responses to said objections (1.8); summarize issues pertaining to [redacted] and email to [redacted] (0.5).	465.00	5.70	2,650.50	Billable
3/6/2018 218763	Anna Gooding W□RK Reformat objected to [redacted] exhibits per request of [redacted].	205.00	5.20	1,066.00	Billable
3/6/2018 218778	Shinae Kim-Helms W□RK Review and finalize Plaintiffs' responses to Defendants' objections to translations entered in [redacted] depositions (0.5); review [redacted] copies of foreign original exhibits prepared by A. Gooding (0.4); send [redacted] to Defense counsel (0.3); update [redacted] tracking chart accordingly (0.5); legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.3).	465.00	3.00	1,395.00	Billable
3/7/2018 218780	Shinae Kim-Helms W□RK Legal analysis of Defendants' objections to translations entered in [redacted] deposition (1.5); review and analysis of cited materials and other related materials and research for supporting arguments (1.4).	465.00	2.90	1,348.50	Billable
3/7/2018 218764	Anna Gooding W□RK Compile all deposition exhibits [redacted] (3.9); email communications with [redacted] (0.3).	205.00	4.20	861.00	Billable
3/28/2018 218770	Nathan Cihlar W□RK Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] deposition (2.8).	625.00	2.80	1,750.00	Billable
3/29/2018 218771	Nathan Cihlar W□RK Draft, edit and provide final proposed responses to objections to translations from documents entered in [redacted] deposition (0.7).	625.00	0.70	437.50	Billable
3/29/2018 218790	Shinae Kim-Helms W□RK Review and finalize Plaintiffs' joint responses to Defendants' objections to translations entered in deposition of [redacted] and update [redacted] chart (0.8); confer with N. Cihlar regarding [redacted] (0.3); conference with K. Yi to [redacted] (0.7).	465.00	1.80	837.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/30/2018 218772	Nathan Cihlar W□RK Draft email with summary explanations and rationale to lead counsel regarding [redacted] (0.5).	625.00	0.50	312.50	Billable
4/9/2018 219071	Shinae Kim-Helms W□RK Review finalized recertified translation and finalize Plaintiffs' joint responses to Defendants' objections to translations entered in [redacted] (0.5); circulate same to Defense counsel (0.2); update master translation objection chart (0.4).	465.00	1.10	511.50	Billable
4/10/2018 219074	Anna Gooding W□RK Correspondance with US Legal regarding [redacted] (0.2); preparing recertified exhibits for replacement per request of [redacted] (0.3).	205.00	0.50	102.50	Billable
6/1/2018 219450	Shinae Kim-Helms W□RK Prepare translation objection status for L. Chan (0.3).	465.00	0.30	139.50	Billable
10/4/2018 220750	Shinae Kim-Helms W□RK Review and analyze Defendants' objections to Plaintiffs' translations entered in [redacted] deposition, analyze relevant materials, and draft responses to [redacted] (3.7).	465.00	3.70	1,720.50	Billable
Total: W□RK			479.40		$206,022.00
T□TAL	Billable Fees		479.40		$206,022.00

Total of billable expense slips		$0.00
	Amount	Total
Total of Fees (Time Charges)		$206,022.00
Total of Costs (Expense Charges)		$0.00
Total new charges		$206,022.00
Total New Balance		$206,022.00

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	205.00	12.80	$2,624.00	$2,624.00	0.00
AG	180.00	40.20	$7,236.00	$7,236.00	0.00
CV	340.00	31.80	$10,812.00	$10,812.00	0.00
KY	155.00	6.90	$1,069.50	$1,069.50	0.00
NC	625.00	4.00	$2,500.00	$2,500.00	0.00
NC	585.00	95.10	$55,633.50	$55,633.50	0.00
SK	465.00	20.20	$9,393.00	$9,393.00	0.00
SK	435.00	268.40	$116,754.00	$116,754.00	0.00

Nickname 244/Ion Batteries(6) □Disc Meet & Con
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
Activity: W□RK					
4/5/2017 215564	Carla Voigt W□RK Meeting with N. Cihlar regarding [redacted].	340.00	0.30	102.00	Billable
4/5/2017 215563	Nathan Cihlar W□RK Review and analyze foreign literal translation responses to [redacted] and [redacted] objections and draft/edit responses to the [redacted] (1.30); meeting with C. Voigt regarding [redacted] (0.30).	585.00	1.60	936.00	Billable
4/6/2017 215560	Nathan Cihlar W□RK Teleconferences with V. Glaze regarding [redacted] (0.60); finalize draft response to translation objections from [redacted] and [redacted] (0.50); draft correspondence email to DPPs and lead counsel regarding [redacted] (0.30).	585.00	1.40	819.00	Billable
4/6/2017 215522	Carla Voigt W□RK Finalize plaintiffs' joint responses to objections to translations entered in the [redacted] and [redacted] depositions per [redacted] edits (1.20).	340.00	1.20	408.00	Billable
4/6/2017 215530	Shinae Kim-Helms W□RK E-mails with V. Glaze and C. Smith regarding [redacted] (0.40); review finalized draft second responses to Defendants objections to translations entered in [redacted] and [redacted] depositions (0.30); identify certified translations ready for re-certification and e-mail to A. Gooding regarding [redacted] (0.50).	435.00	1.20	522.00	Billable
4/7/2017 215504	Anna Gooding W□RK Prepare and send documents for recertification per request of [redacted].	180.00	3.20	576.00	Billable
4/7/2017 215532	Shinae Kim-Helms W□RK E-mails with S. Nagano to [redacted] (0.30); e-mails with A. Gooding regarding [redacted] (0.40); review draft instructions to [redacted] to recertify translations prepared by A. Gooding (0.5); e-mails with A. Gooding regarding [redacted] (0.10).	435.00	1.30	565.50	Billable
4/10/2017 215506	Anna Gooding W□RK Prepare and send documents for recertification per request of [redacted].	180.00	2.00	360.00	Billable
4/10/2017 215533	Shinae Kim-Helms W□RK Review and revise draft e-mail and attachments requesting [redacted] (0.80); review Plaintiffs second responses to Defendants objections to translations entered in [redacted] and [redacted] depositions (0.50); review translations resolved in [redacted] (0.50).	435.00	1.80	783.00	Billable
4/11/2017 215561	Nathan Cihlar W□RK Review and initial analysis of [redacted] translation objections and logistics of [redacted] (0.50); teleconference with S. Kim-Helms regarding [redacted] (0.30).	585.00	0.80	468.00	Billable
4/11/2017 215534	Shinae Kim-Helms W□RK Evaluate timeliness of Defendants objections to Plaintiffs translations entered in [redacted] deposition (0.50); teleconference with US Legal regarding same (0.40); teleconference with N. Cihlar regarding [redacted] (0.40); review and analyze Defendants objections to Plaintiffs translations entered in [redacted] deposition (1.50); prepare responses to [redacted] (1.10).	435.00	3.90	1,696.50	Billable
4/12/2017 215538	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] deposition	435.00	4.10	1,783.50	Billable

244/Ion Batteries(6): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	(1.60); prepare responses to same (1.70); receive and review Defendants objections to translations entered in [redacted] depositions (0.50); e-mails with K. Yamada regarding [redacted] (0.30).				
4/13/2017 215541	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] deposition (2.00); prepare responses to [redacted] (1.70); review cited materials (1.00).	435.00	4.70	2,044.50	Billable
4/14/2017 215562	Nathan Cihlar W□RK Emails with V. Glaze regarding final edits to [redacted] and [redacted] responses to translation objections.	585.00	0.20	117.00	Billable
4/14/2017 215543	Shinae Kim-Helms W□RK Receive and review Defendants objections to translations entered in [redacted] depositions (0.50); evaluate [redacted] of said objections (0.40); e-mails with V. Glaze regarding same (0.20); e-mails with E. Miorin regarding [redacted] (0.30); review said recertified translations (0.50); e-mails with N. Cihlar and V. Glaze regarding [redacted] (0.30); review, revise and finalize Plaintiffs second responses to Defendants objections to exhibits entered in [redacted] and [redacted] depositions (1.00); review and confirm accuracy of recertified translations resolved in [redacted] and [redacted] translation objection set (0.50); e-mails with E. Miorin regarding [redacted] (0.40); circulate [redacted] to Defense counsel (0.20); update [redacted] chart [redacted] (0.80); circulate [redacted] to N. Cihlar, V. Glaze, C. Voigt, A. Gooding and E. Miorin (0.20).	435.00	5.30	2,305.50	Billable
4/17/2017 215545	Shinae Kim-Helms W□RK Evaluate [redacted] of Defendants objections to Plaintiffs translations entered in [redacted] deposition (0.40); teleconference with [redacted] regarding [redacted] (0.40); e-mails with V. Glaze regarding same (0.40); review and analyze Defendants objections to Plaintiffs translations entered in [redacted] deposition (1.50); review translation also entered along with [redacted] letter brief (0.50); e-mails with A. Gooding regarding [redacted] (0.40).	435.00	3.60	1,566.00	Billable
4/18/2017 215546	Shinae Kim-Helms W□RK E-mails with V. Glaze regarding [redacted] (0.50); e-mail with N. Cihlar regarding [redacted] (0.30).	435.00	0.80	348.00	Billable
4/21/2017 215553	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (1.00); review and revise draft responses prepared by [redacted] (0.70); review cited materials (1.30); prepare supporting arguments (2.20).	435.00	5.20	2,262.00	Billable
4/24/2017 215554	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (1.20); review and revise draft responses prepared by [redacted] (0.80); review cited materials (1.10); prepare supporting arguments (2.10).	435.00	5.20	2,262.00	Billable
4/25/2017 215555	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (0.80); review and revise draft responses prepared by [redacted] (0.80); review cited materials (1.50); prepare supporting arguments (2.50); e-mails and follow-up teleconference with S. Nagano regarding [redacted] (0.60); e-mails with K. Yamada regarding [redacted] (0.40).	435.00	6.60	2,871.00	Billable
4/26/2017 215556	Shinae Kim-Helms W□RK Review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (0.50); review and revise draft responses prepared by [redacted] (0.50); review cited materials (0.50); prepare supporting arguments (1.50); finalize said responses and review for translations ready for re-certification (0.40); prepare summary of Plaintiffs responses to the said [redacted] translation objections (0.50).	435.00	3.90	1,696.50	Billable
4/28/2017 215557	Shinae Kim-Helms W□RK Review Defendants objections to Plaintiffs translations entered in [redacted] and [redacted] depositions (1.50); review status of draft responses prepared by [redacted] (0.30); e-mails with	435.00	5.70	2,479.50	Billable

244/Ion Batteries(6): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	V. Glaze, C. Smith and K. Yamada regarding [redacted] (0.30); e-mail to A. Gooding [redacted] (0.40); review and analyze Defendants objections to Plaintiffs translations entered in [redacted] depositions (1.50); e-mails with E. Miorin regarding [redacted] (0.20); review and revise responses drafted by [redacted] (0.50); review cited materials (1.00).				
Total: W□RK			64.00		$26,971.50
T□TAL	Billable Fees		64.00		$26,971.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$26,971.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$26,971.50
Total New Balance		$26,971.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	180.00	5.20	$936.00	$936.00	0.00
CV	340.00	1.50	$510.00	$510.00	0.00
NC	585.00	4.00	$2,340.00	$2,340.00	0.00
SK	435.00	53.30	$23,185.50	$23,185.50	0.00

Nickname 244/Ion Batteries(7) □Doc Review
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
Activity: W□RK					
3/1/2017 214947	Shinae Kim-Helms W□RK E-mails with Consortra regarding [redacted] (0.20); e-mails with H. Rim regarding [redacted] (0.10); update [redacted] chart accordingly (0.20).	435.00	0.50	217.50	Billable
3/2/2017 214949	Shinae Kim-Helms W□RK E-mails with Consortra regarding [redacted] (0.40); e-mails with H. Rim regarding [redacted] (0.10).	435.00	0.50	217.50	Billable
3/3/2017 215106	Elizabeth Miorin W□RK Upload [redacted] to LCHB sharesite and remove [redacted] version (0.5); pull foreign original documents for review (0.7); email correspondence with translation company [redacted] (0.1); update [redacted] list with [redacted] per request of [redacted] (0.5).	155.00	1.80	279.00	Billable
3/3/2017 214951	Shinae Kim-Helms W□RK Receive and review documents requested for [redacted] by H. Rim (0.50); search for [redacted] in database (1.0); e-mails with E. Miorin regarding [redacted] and authorize [redacted] (0.20); prepare partial informal translations to expedite translation process (1.50); e-mails with V. Glaze regarding [redacted] (0.20); receive and review translation requested for [redacted] by L. Chan (0.10); e-mail to Consortra for [redacted] (0.10).	435.00	3.60	1,566.00	Billable
3/6/2017 215098	Anna Gooding W□RK Update [redacted] list with [redacted] (0.2); email correspondence with translation company regarding [redacted] (0.1); review certified translations for [redacted] per request of [redacted] (0.2).	180.00	0.50	90.00	Billable
3/6/2017 215107	Elizabeth Miorin W□RK Email correspondence with translation company regarding [redacted] (0.2); review certified translations for [redacted] (1.0); email correspondence with translation company regarding [redacted] (0.3); update [redacted] list with [redacted] (0.8); email correspondence with translation company [redacted] (0.1); prepare [redacted] for translation and check for duplicates per request of [redacted] (1.2).	155.00	3.60	558.00	Billable
3/6/2017 214954	Shinae Kim-Helms W□RK Review email between Consortra and E. Miorin to [redacted] (0.20); proofread draft translations for YS Kim deposition (2.0); e-mails with H. Rim and T. Lee regarding [redacted] (0.20); e-mails with V. Glaze regarding [redacted] (0.30).	435.00	2.70	1,174.50	Billable
3/7/2017 215076	Shinae Kim-Helms W□RK Search for information relating to [redacted].	435.00	0.50	217.50	Billable
3/15/2017 215090	Shinae Kim-Helms W□RK Review Translation Protocol for use of [redacted] per S. Scarlett and prepare summary thereof (0.4).	435.00	0.40	174.00	Billable
3/15/2017 215112	Elizabeth Miorin W□RK Update [redacted] list with [redacted] (0.5); email correspondence with translation company regarding [redacted] (0.2); review certified translations for [redacted] (0.8); email correspondence with translation company regarding [redacted] (0.1); finalizing translations per request of [redacted] (0.8).	155.00	2.40	372.00	Billable
3/17/2017 215092	Shinae Kim-Helms W□RK Receive and review documents requested for [redacted] by V. Glaze in preparation for [redacted]	435.00	2.60	1,131.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] deposition (0.7); search for [redacted] in database (1.4); summarize search results and recommend documents for translation (0.5).				
3/17/2017 215113	Elizabeth Miorin W□RK Update [redacted] list with [redacted] (0.8); email correspondence with translation company requesting [redacted] (0.2); send documents to be proofread (0.2); prepare [redacted] for translation and check for [redacted] (1.0); email correspondence with translation company regarding the [redacted] (0.1); finalizing translations per request of [redacted] (0.7).	155.00	3.00	465.00	Billable
3/20/2017 215094	Shinae Kim-Helms W□RK E-mails with B. Miller regarding [redacted] (0.3); e-mails with A. Gooding regarding [redacted] (0.3).	435.00	0.60	261.00	Billable
3/20/2017 215099	Anna Gooding W□RK Prepare foreign documents for translation (1.5); send [redacted] (0.2); update [redacted] (2.0); update [redacted] list with [redacted] per request of [redacted] (1.9).	180.00	5.60	1,008.00	Billable
3/21/2017 215133	Shinae Kim-Helms W□RK E-mails with R. Hisun regarding [redacted] (0.3); receive and review documents requested for [redacted] (0.5); search for [redacted] in database (1); prepare summary and recommend documents for translation to H. Rim (0.4); e-mail to A. Gooding and E. Miorin [redacted] (0.2).	435.00	2.40	1,044.00	Billable
3/21/2017 215100	Anna Gooding W□RK Update [redacted] list with [redacted] (1.5); update [redacted] list (3.5); replace [redacted] of translations per request of [redacted] (0.8).	180.00	5.80	1,044.00	Billable
3/22/2017 215135	Shinae Kim-Helms W□RK Receive and review request [redacted] (0.4); teleconference with A. Gooding and E. Miorin regarding [redacted] (0.4).	435.00	0.80	348.00	Billable
3/22/2017 215101	Anna Gooding W□RK Prepare and foreign documents for translation (2.0); send [redacted] (0.2); update [redacted] list with [redacted] (0.6); pull exhibits for [redacted] per request of [redacted] (0.4).	180.00	3.20	576.00	Billable
3/23/2017 215137	Shinae Kim-Helms W□RK E-mails with H. Rim regarding a [redacted] (0.3); receive and review documents requested [redacted] (0.4); search for [redacted] in database (0.8); provide H. Rim with [redacted] (0.4); e-mail to A. Gooding and E. Miorin [redacted] (0.2).	435.00	2.10	913.50	Billable
3/23/2017 215114	Elizabeth Miorin W□RK Pull foreign original documents for review (0.2); email correspondence with translation company [redacted] (0.2); review certified translations for [redacted] (0.5); update [redacted] list with [redacted] per request of S. Kim-Helms (0.3).	155.00	1.20	186.00	Billable
3/24/2017 215138	Shinae Kim-Helms W□RK E-mails with V. Glaze regarding [redacted] (0.2); e-mails with A. Gooding and E. Miorin regarding [redacted] (0.2).	435.00	0.40	174.00	Billable
3/24/2017 215115	Elizabeth Miorin W□RK Upload [redacted] to LCHB sharesite (0.1); email correspondence with translation company [redacted] (0.2); update [redacted] list with [redacted] per request of [redacted] (1.5).	155.00	1.80	279.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
3/27/2017 215141	Shinae Kim-Helms W□RK Review e-mails between E. Miorin and Consortra to [redacted] (0.3); receive and review documents [redacted] (0.3); search for duplicates and near duplicates in database (0.5); e-mail to H. Rim regarding [redacted] (0.4); e-mail to E. Miorin [redacted] t (0.2).	435.00	1.70	739.50	Billable
3/27/2017 215102	Anna Gooding W□RK Update [redacted] list with [redacted] (0.8); email correspondence with translation company regarding [redacted] (0.2); review certified translations for [redacted] (1.0); pull and compare pc [redacted] per request of [redacted] (0.3).	180.00	2.30	414.00	Billable
3/27/2017 215116	Elizabeth Miorin W□RK Email correspondence with translation company regarding [redacted] (0.2); review certified translations for [redacted] (1.5); email correspondence with translation company regarding [redacted] (0.2); update [redacted] list with [redacted] (0.5); email correspondence with translation company [redacted] (0.1); update [redacted] list with [redacted] per request of [redacted] (1.3).	155.00	3.80	589.00	Billable
3/28/2017 215145	Shinae Kim-Helms W□RK Review e-mails between E. Miorin/ A. Gooding and Consortra [redacted] (0.5); e-mails with A. Gooding, E. Miorin and Japanese language review team [redacted] (0.5); receive and review documents [redacted] (0.2); search for [redacted] in database (0.5); e-mail to B. Miller regarding [redacted] (0.2); e-mail to A. Gooding/ E. Miorin [redacted] (0.2).	435.00	2.10	913.50	Billable
3/28/2017 215103	Anna Gooding W□RK Check translation status and prepare foreign documents for translation (0.5); send [redacted] (0.1); update [redacted] list with [redacted] (0.2); code translation status on [redacted] per request of [redacted] (0.2).	180.00	1.00	180.00	Billable
3/28/2017 215117	Elizabeth Miorin W□RK Email correspondence with translation company regarding [redacted] (0.1); review certified translations for [redacted] (0.5); email correspondence with translation company regarding the [redacted] (0.1); finalize certified translations (0.4); update [redacted] list with [redacted] per request of [redacted] (0.3).	155.00	1.40	217.00	Billable
3/29/2017 215146	Shinae Kim-Helms W□RK Review e-mails between A. Gooding/ E. Miorin and Consortra to [redacted] (0.3); e-mails with A. Gooding and E. Miorin to [redacted] (0.3).	435.00	0.60	261.00	Billable
3/29/2017 215104	Anna Gooding W□RK Update [redacted] list with recent translations (0.2); email correspondence with translation company regarding [redacted] (0.2); review certified translations for [redacted] and finalize translations (0.5); code [redacted] on [redacted] per request of [redacted] (0.1).	180.00	1.00	180.00	Billable
3/30/2017 215147	Shinae Kim-Helms W□RK [redacted] from S. Scarlett and emails with S. Scarlett regarding [redacted] (0.5); review said document and search for [redacted] in database (0.7); prepare informal translation of same (0.8); e-mail [redacted] (0.3); review e-mails between Consortra and E. Miorin/A. Gooding to [redacted] (0.6); prepare [redacted] of documents requested for certified translation (0.5).	435.00	3.40	1,479.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
3/30/2017 215105	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Email correspondence with translation company [redacted] (0.1); review certified translations for [redacted] per request of [redacted] (0.4).				
3/30/2017 215118	Elizabeth Miorin W□RK	155.00	1.60	248.00	Billable
	Email correspondence with translation company [redacted] (0.1); review certified translations for [redacted] (0.5); email correspondence with translation company regarding [redacted] (0.1); finalize certified translations (0.3); update [redacted] list with [redacted] per request of [redacted] (0.6).				
3/31/2017 215148	Shinae Kim-Helms W□RK	435.00	2.00	870.00	Billable
	Review draft translations delivered by [redacted] (0.2); e-mail to A. Gooding/ E. Miorin re: [redacted] (0.4); review and revise draft LGC translation prepared by [redacted] (0.7); e-mail to Consortra regarding [redacted] (0.4); review e-mails between E. Miorin and Consortra to [redacted] (0.3).				
3/31/2017 215119	Elizabeth Miorin W□RK	155.00	2.20	341.00	Billable
	Email correspondence with translation company regarding [redacted] (0.1); review certified translations for [redacted] (0.6); email correspondence with translation company regarding [redacted] (0.2); finalize certified translations (0.5); update [redacted] list with [redacted] (0.3); upload [redacted] list and [redacted] to LCHB sharefile site per request of [redacted] (0.5).				
4/3/2017 215239	Shinae Kim-Helms W□RK	435.00	1.20	522.00	Billable
	E-mails with E. Miorin regarding [redacted] (0.4); teleconference with E. Miorin regarding [redacted] (0.2); e-mails with V. Glaze regarding [redacted] (0.3); review e-mails between Consortra and E. Miorin [redacted] (0.3).				
4/3/2017 215513	Elizabeth Miorin W□RK	155.00	2.80	434.00	Billable
	Email correspondence with translation company regarding [redacted] (0.50); review documents for [redacted] and emails with translation company regarding [redacted] (1.10); finalize translations and email correspondence regarding [redacted] (0.30); update [redacted] with recent translations (0.70); circulate finalized documents for use per request of [redacted] (0.20).				
4/4/2017 215500	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Update [redacted] list with [redacted] per request of [redacted].				
4/4/2017 215514	Elizabeth Miorin W□RK	155.00	0.60	93.00	Billable
	Review documents for [redacted] and emails with translation company regarding [redacted] (0.40); finalize translations and email correspondence regarding [redacted] (0.10)update [redacted] list with [redacted] per request of S. Kim-Helms (0.10).				
4/5/2017 215501	Anna Gooding W□RK	180.00	1.20	216.00	Billable
	Update [redacted] list with recent translations (0.20); review certified translations for formatting accuracy (0.50); finalize translations (0.10); code translations on [redacted] (0.10); check translation status per request of [redacted] (0.30).				
4/5/2017 215528	Shinae Kim-Helms W□RK	435.00	1.20	522.00	Billable
	Review emails between Consortra and E. Miorin/ A. Gooding to [redacted] (0.40); update [redacted] chart accordingly (0.30); e-mails with A. Gooding/ E. Miorin regarding [redacted] (0.30); teleconference with A. Gooding and E. Miorin regarding [redacted] (0.20).				
4/6/2017 215502	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Update [redacted] list with recent translations (0.20); email correspondence with translation company regarding [redacted] (0.20); review certified translations for [redacted] (0.40); finalize translations per request of [redacted] (0.20).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
4/7/2017 215516	Elizabeth Miorin W□RK	155.00	0.50	77.50	Billable
	Review documents for [redacted] and emails with translation company regarding [redacted] (0.20); finalize translations and email correspondence regarding [redacted] (0.20); update [redacted] list with [redacted] per request of [redacted] (0.10).				
4/7/2017 215503	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Update [redacted] list with [redacted] (0.50); code translations on [redacted] per request of [redacted] (0.50).				
4/10/2017 215505	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Update [redacted] list with [redacted] (0.80); code translations on [redacted] per request of [redacted] (0.20).				
4/11/2017 215507	Anna Gooding W□RK	180.00	3.80	684.00	Billable
	Update [redacted] list with [redacted] (0.80); update [redacted] list per request of [redacted] (3.00).				
4/11/2017 215535	Shinae Kim-Helms W□RK	435.00	1.10	478.50	Billable
	E-mails with J. Decena regarding [redacted] (0.30); review and revise draft Deposition Index (0.80).				
4/12/2017 215508	Anna Gooding W□RK	180.00	4.20	756.00	Billable
	Update [redacted] list with [redacted] (1.20); update [redacted] list per request of [redacted] (3.00).				
4/13/2017 215517	Elizabeth Miorin W□RK	155.00	1.20	186.00	Billable
	Review documents for [redacted] (0.80); finalize [redacted] dcouments and email correspondence with translation company regarding [redacted] (0.20); update [redacted] list with [redacted] per request of [redacted] (0.20).				
4/17/2017 215519	Elizabeth Miorin W□RK	155.00	1.30	201.50	Billable
	Emails regarding [redacted] (0.20); review documents for [redacted] (0.50); finalize translations and email correspondence regarding [redacted] (0.30); upload [redacted] translations to LCHB sharesite (0.10); update [redacted] list with [redacted] per request of [redacted] (0.20).				
4/17/2017 215510	Anna Gooding W□RK	180.00	1.50	270.00	Billable
	Update [redacted] list with [redacted] (0.40); update [redacted] list (0.50); send document for [redacted] (0.30); check status of entered exhibits per request of [redacted] (0.30).				
4/17/2017 215544	Shinae Kim-Helms W□RK	435.00	1.50	652.50	Billable
	Receive and review request for [redacted] (0.30); e-mails with H. Rim regarding [redacted] (0.20); e-mails with A. Gooding and follow up teleconference call regarding [redacted] (0.50); review e-mails between [redacted] and [redacted] to [redacted] (0.30); e-mails with V. Glaze regarding [redacted] (0.20).				
4/18/2017 215548	Shinae Kim-Helms W□RK	435.00	1.40	609.00	Billable
	Receive and review document requested for [redacted] (0.50); search for [redacted] in database (0.40); e-mails with H. Rim regarding [redacted] (0.30); e-mail to A. Gooding and E. Miorin [redacted] (0.20).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
4/19/2017 215511	Anna Gooding W□RK Prepare foreign document for translation (0.30); [redacted] list with [redacted] per request of [redacted] (0.20).	180.00	0.50	90.00	Billable
4/19/2017 215549	Shinae Kim-Helms W□RK Search for and review [redacted] (2.50); prepare summaries of relevant documents (0.50).	435.00	3.00	1,305.00	Billable
4/20/2017 215520	Elizabeth Miorin W□RK Upload Exhibit [redacted] to LCHB [redacted] and emails regarding [redacted] (0.30)	155.00	0.30	46.50	Billable
4/20/2017 215512	Anna Gooding W□RK Update [redacted] list with [redacted] (1.50); update [redacted] list per request of [redacted] (3.00).	180.00	4.50	810.00	Billable
4/20/2017 215552	Shinae Kim-Helms W□RK Review updated exhibit list prepared by A. Gooding (0.40); e-mails with E. Miorin and A. Gooding regarding [redacted] (0.50); circulate [redacted] to co-counsel (0.20); e-mail with V. Glaze regarding same (0.20); search for and review further [redacted] (1.80); prepare summaries of relevant documents (0.20).	435.00	3.30	1,435.50	Billable
4/28/2017 215558	Shinae Kim-Helms W□RK E-mails with V. Glaze regarding [redacted] (0.40).	435.00	0.40	174.00	Billable
4/28/2017 215521	Elizabeth Miorin W□RK Pull Exhibits and Certified translations of exhibits for review per request of [redacted] (0.60).	155.00	0.60	93.00	Billable
5/2/2017 215646	Shinae Kim-Helms W□RK E-mails with A. Gooding and E. Miorin [redacted] (0.5); receive copies of cited exhibits entered in said depositions (0.2); e-mails with V. Glaze regarding [redacted] (0.2).	435.00	0.90	391.50	Billable
5/3/2017 215648	Shinae Kim-Helms W□RK E-mails with H. Rim and A. Gooding regarding [redacted] (0.2); e-mails with H. Rim regarding [redacted] (0.2).	435.00	0.40	174.00	Billable
5/4/2017 215676	Anna Gooding W□RK Email with S. Kim-Helms and H. Rim regarding [redacted]	180.00	0.20	36.00	Billable
5/5/2017 215651	Shinae Kim-Helms W□RK E-mails with C. Lovell regarding [redacted] (0.3); e-mails with A. Gooding regarding [redacted] (0.2); search for [redacted] with [redacted] in database (0.5).	435.00	1.00	435.00	Billable
5/9/2017 215653	Shinae Kim-Helms W□RK Receive and review [redacted] (0.4); e-mail to Consortra [redacted] (0.4).	435.00	0.80	348.00	Billable
5/10/2017 215677	Anna Gooding W□RK Send translation for [redacted] (0.3); update [redacted] list with [redacted] per request of [redacted] (0.2).	180.00	0.50	90.00	Billable
5/16/2017 215678	Anna Gooding W□RK Update [redacted] list with [redacted] per request of [redacted].	180.00	2.20	396.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
5/17/2017 215679	Anna Gooding W□RK Compile list of [redacted] per request of [redacted]	180.00	0.40	72.00	Billable
5/18/2017 215680	Anna Gooding W□RK Update [redacted] list with [redacted] (1.3); update [redacted] list per request of [redacted] (3.0).	180.00	4.30	774.00	Billable
5/30/2017 215681	Anna Gooding W□RK Update [redacted] list with [redacted] (0.6); update [redacted] list per request of [redacted] (2.6).	180.00	3.20	576.00	Billable
6/8/2017 216190	Anna Gooding W□RK Prepare foreign documents for translation (0.4); update [redacted] list per request of [redacted] (0.1).	180.00	0.50	90.00	Billable
6/13/2017 216179	Shinae Kim-Helms W□RK Receive and review documents [redacted] (0.2); search for [redacted] in database (0.3); advise D. Lambrinos regarding [redacted] (0.2); e-mails with T. Lee regarding [redacted] (0.2).	435.00	0.90	391.50	Billable
6/14/2017 216180	Shinae Kim-Helms W□RK Prepare English translation of [redacted] document per D. Lambrinos (2.4); e-mail with D. Lambrinos and T. Lee regarding [redacted] (0.3); e-mail with Consortra regarding [redacted] (0.2); review draft translation prepared by [redacted] (0.3); teleconference with D. Lambrionos regarding [redacted] (0.1).	435.00	3.30	1,435.50	Billable
6/14/2017 216191	Anna Gooding W□RK Prepare and send [redacted] for translation (0.8); update [redacted] list (0.4); finalize translations per request of [redacted] (0.9).	180.00	2.10	378.00	Billable
6/15/2017 216192	Anna Gooding W□RK Format translations (0.8); finalize translations per request of [redacted] (0.5).	180.00	1.30	234.00	Billable
6/16/2017 216193	Anna Gooding W□RK Update [redacted] list (0.6); code documents on [redacted] per request of [redacted] (0.3).	180.00	0.90	162.00	Billable
6/21/2017 216194	Anna Gooding W□RK Update [redacted] list with [redacted] per request of [redacted].	180.00	2.00	360.00	Billable
6/29/2017 216197	Anna Gooding W□RK Check translation status and for [redacted] (1.0); pull documents to send for translation per request of [redacted] (0.5).	180.00	1.50	270.00	Billable
7/5/2017 216515	Shinae Kim-Helms W□RK Review documents requested for translation by D. Lambrinos (0.2); search for [redacted] in database (0.5); e-mails with T. Lee regarding [redacted] (0.3); check translation status of [redacted] for [redacted] per D. Lambrinos and e-mails with D. Lambrinos regarding [redacted] (0.5).	435.00	1.50	652.50	Billable
7/6/2017 216517	Shinae Kim-Helms W□RK Review informal translations prepared by [redacted] (0.3); review and compare [redacted] documents requested for [redacted] per D. Lambrinos and e-mail with A. Gooding regarding [redacted] (0.5); assign [redacted] to T. Lee (0.2).	435.00	1.00	435.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
7/6/2017 216549	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Check translation status and [redacted] potential foreign documents for translation per request of [redacted].				
7/7/2017 216520	Shinae Kim-Helms W□RK	435.00	1.40	609.00	Billable
	Discussion with D. Lambrinos regarding [redacted] (0.5); search for [redacted] per D. Lambrinos (0.7); e-mails with A. Gooding regarding [redacted] (0.2).				
7/7/2017 216550	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Format informal translations (0.6); update [redacted] list (0.2); code translations on [redacted] per request of [redacted] (0.2).				
7/11/2017 216525	Shinae Kim-Helms W□RK	435.00	1.80	783.00	Billable
	Receive and review documents requested for translation by [redacted] (0.4); search for [redacted] and check translation status (0.5); Email [redacted] regarding [redacted] (0.5); receive and review document [redacted] by D. Lambrinos (0.2); e-mail with T. Lee regarding [redacted] (0.2).				
7/12/2017 216528	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	E-mails with A. Gooding and D. Lambrinos regarding [redacted] 0.4).				
7/12/2017 216551	Anna Gooding W□RK	180.00	1.00	180.00	Billable
	Check translation status (0.8); update [redacted] list per request of [redacted] (0.2).				
7/13/2017 216530	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	Review documents containing [redacted], e-mails with A. Gooding regarding [redacted] and send [redacted] to D. Lambrinos (0.5).				
7/13/2017 216552	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Pull information for [redacted] per request of [redacted].				
7/18/2017 216534	Shinae Kim-Helms W□RK	435.00	1.60	696.00	Billable
	E-mails with H. Rim and T. Lee regarding [redacted] (0.3); review document [redacted] by D. Lambrinos and assign same to T. Lee (0.5); brief review of documents related to [redacted] per D. Lambrinos and e-mails with D. Lambrinos and T. Lee regarding [redacted] (0.8).				
7/19/2017 216536	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	E-mail to S. Scarlett regarding [redacted] and e-mails with A. Gooding and H. Rim regarding [redacted] (0.4).				
7/19/2017 216555	Anna Gooding W□RK	180.00	0.50	90.00	Billable
	Email correspondence with translation company regarding [redacted] (0.2); review translations for [redacted] per request of [redacted] (0.3).				
7/20/2017 216566	Karen Yi W□RK	155.00	1.00	155.00	Billable
	Update [redacted] chart (0.50), upload [redacted] to informal [redacted] folder (.20), code [redacted] on [redacted] (0.30).				
7/20/2017 216556	Anna Gooding W□RK	180.00	0.40	72.00	Billable
	Email correspondence with translation company regarding [redacted] (0.2); review translations for [redacted] per request of [redacted] (0.2).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
7/21/2017 216540	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	E-mails with H. Rim and A. Gooding regarding [redacted] e-mails between Consortra and A. Gooding/K. Yi regarding [redacted] (0.4).				
7/21/2017 216567	Karen Yi W□RK	155.00	0.60	93.00	Billable
	Provide translation status (0.30), email correspondence with translation company regarding [redacted] (0.30).				
7/24/2017 216568	Karen Yi W□RK	155.00	0.20	31.00	Billable
	Email correspondence with translation company regarding [redacted].				
7/24/2017 216557	Anna Gooding W□RK	180.00	1.10	198.00	Billable
	Email correspondence with translation company regarding [redacted] (0.2); review translations for [redacted] (0.4); finalize certified translations (0.3); code [redacted] on [redacted] per request of [redacted] (0.2).				
7/26/2017 216569	Karen Yi W□RK	155.00	1.30	201.50	Billable
	Send documents for [redacted] (0.20), review certified translation for [redacted] (0.50), upload [redacted] to shared site (0.20), upload [redacted] to server (0.10), update [redacted] list (0.30).				
7/27/2017 216559	Anna Gooding W□RK	180.00	2.00	360.00	Billable
	Check translation status (0.7); circulate [redacted] to depo team (0.1); email correspondence with translation company regarding [redacted] (0.1); review translations [redacted] (0.7); finalize certified translations per request of [redacted] (0.4).				
7/28/2017 216570	Karen Yi W□RK	155.00	0.20	31.00	Billable
	Circulate [redacted] per request of [redacted] (0.20).				
7/31/2017 216560	Anna Gooding W□RK	180.00	2.00	360.00	Billable
	Update [redacted] list with [redacted] per request of [redacted].				
8/21/2017 216817	Shinae Kim-Helms W□RK	435.00	1.00	435.00	Billable
	Review document requested for certified translation by [redacted] and e-mails with B. Regarding [redacted] (0.5); prepare native version of document for easy formatting and request said [redacted] to Consortra (0.5).				
8/22/2017 216819	Shinae Kim-Helms W□RK	435.00	1.50	652.50	Billable
	Receive and review documents [redacted] by B. Miller and discuss [redacted] (0.5); e-mails with K. Yi [redacted] and circulate same to B. Miller and team (1).				
8/22/2017 216843	Karen Yi W□RK	155.00	1.50	232.50	Billable
	Format informal translation [redacted] per request of [redacted] (1.50).				
8/23/2017 216822	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	Receive and review documents requested for [redacted] by B. Miller and e-mails with B. Miller regarding [redacted] (0.5).				
8/25/2017 216825	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	E-mails with Consortra regarding [redacted] (0.3); e-mails with H. Hsu regarding [redacted] (0.2).				
8/29/2017 216854	Shinae Kim-Helms W□RK	435.00	0.80	348.00	Billable
	Review translation revised by Consortra and e-mails with A. Gooding regarding [redacted] (0.4); review				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	e-mails between K. Yi and Consortra to [redacted] and circulate [redacted] to deposition team (0.4).				
8/29/2017 216838	Anna Gooding W□RK Email correspondence with translation company regarding [redacted] (0.2); review translations [redacted] (0.6); finalize certified translations per request of [redacted] (0.7).	180.00	1.50	270.00	Billable
8/30/2017 216857	Shinae Kim-Helms W□RK E-mails with H. Rim to discuss [redacted] (0.4); e-mails with H. Rim regarding [redacted] (0.2); receive and review documents [redacted] by C. Lovell and check for [redacted] in database (0.5); e-mails with C. Lovell regarding [redacted] and email to A. Gooding/K. Yi [redacted] (0.4).	435.00	1.50	652.50	Billable
8/30/2017 216839	Anna Gooding W□RK Check translation status (0.3); prepare and send foreign documents [redacted] (0.7); update [redacted] list with newly [redacted] per request of [redacted] (0.5).	180.00	1.50	270.00	Billable
8/31/2017 216860	Shinae Kim-Helms W□RK E-mails with Consortra regarding [redacted] (0.2); e-mails with C. Lovell and T. Lee regarding [redacted] (0.2).	435.00	0.40	174.00	Billable
9/1/2017 216863	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
9/5/2017 217033	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
9/6/2017 217036	Shinae Kim-Helms W□RK Receive and review document requested for [redacted] (0.2); search for [redacted] in database (0.3); e-mail to A. Gooding and K. Yi [redacted] (0.2); proofread [redacted] (1.2); assign draft translation of [redacted] document to T. Lee for [redacted] (0.2).	435.00	2.10	913.50	Billable
9/7/2017 217025	Anna Gooding W□RK Update [redacted] and [redacted] chart with exhibits [redacted] per request of [redacted]	180.00	1.50	270.00	Billable
9/8/2017 217021	Karen Yi W□RK Review certified translation for [redacted] (0.30); Send documents for [redacted] (0.20).	155.00	0.50	77.50	Billable
9/12/2017 217041	Shinae Kim-Helms W□RK E-mail to T. Lee regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
9/13/2017 217042	Shinae Kim-Helms W□RK Review and oversee finalization of outstanding certified translation requested for upcoming [redacted] deposition (0.5).	435.00	0.50	217.50	Billable
9/14/2017 217043	Shinae Kim-Helms W□RK Review and oversee finalization of outstanding certified translation requested for upcoming [redacted] deposition (0.3).	435.00	0.30	130.50	Billable
9/14/2017 217026	Anna Gooding W□RK Email correspondence with translation company regarding [redacted] (0.2); review translations for [redacted] (0.5); finalize certified translations (0.3); code [redacted] on [redacted] (0.2); udpate [redacted] list per request of [redacted] (0.3).	180.00	1.50	270.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
9/18/2017 217044	Shinae Kim-Helms W□RK Receive and review documents [redacted] (0.4); search for [redacted] in database and check [redacted] (0.5).	435.00	0.90	391.50	Billable
9/19/2017 217027	Anna Gooding W□RK Update [redacted] list with [redacted] (1.4); prepare and send foreign documents for translation (0.5); update [redacted] list per request of [redacted] (0.1).	180.00	2.00	360.00	Billable
9/22/2017 217023	Karen Yi W□RK Send e-mail regarding [redacted] (0.20).	155.00	0.20	31.00	Billable
9/22/2017 217051	Shinae Kim-Helms W□RK Receive and review documents [redacted] (0.3); search for [redacted] in database (0.4); e-mails with H. Rim regarding same (0.2).	435.00	0.90	391.50	Billable
9/25/2017 217052	Shinae Kim-Helms W□RK E-mail to T. Lee regarding [redacted].	435.00	0.20	87.00	Billable
9/27/2017 217030	Anna Gooding W□RK Compare translations for [redacted] (0.6); check and finalize [redacted] translations (1.0); update [redacted] per request of [redacted] (0.3).	180.00	1.90	342.00	Billable
9/29/2017 217059	Shinae Kim-Helms W□RK Receive and review request [redacted] and email with H. Rim regarding [redacted]	435.00	0.40	174.00	Billable
10/2/2017 217300	Anna Gooding W□RK Send translation for [redacted] (0.2); check that [redacted] (0.4); upload [redacted] to shared site (0.2); update [redacted] list per request of [redacted] (0.2).	180.00	1.00	180.00	Billable
10/9/2017 217264	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.4); receive and review [redacted] and search for [redacted] documents in database (1); analyze [redacted] and provide advice on [redacted] per [redacted] request (0.4).	435.00	1.80	783.00	Billable
10/10/2017 217267	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.2); receive and review documents requested for [redacted] by [redacted] and search for dup [redacted] in database (0.5).	435.00	0.70	304.50	Billable
10/11/2017 217308	Anna Gooding W□RK Prepare and send [redacted] for translation per request of [redacted].	180.00	0.50	90.00	Billable
10/13/2017 217277	Shinae Kim-Helms W□RK Receive and review request for [redacted] (0.5); e-mails with H. Rim regarding [redacted] (0.2); e-mail correction request to [redacted] (0.2).	435.00	0.90	391.50	Billable
10/16/2017 217310	Anna Gooding W□RK Add [redacted] to [redacted] tracking chart per request of [redacted].	180.00	2.00	360.00	Billable
10/17/2017 217312	Anna Gooding W□RK Send translation for [redacted] (0.3); check that [redacted] (0.5); update	180.00	1.00	180.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] list; email correspondence with B. Troxel regarding [redacted] per request of [redacted] (0.2).				
10/26/2017 217330	Karen Yi W□RK Update [redacted] list with [redacted] (0.30); finalize [redacted] (0.20); code [redacted] on [redacted] (0.10); [redacted] (0.30); circulate [redacted] (0.10); review [redacted] for [redacted] (0.20).	155.00	1.20	186.00	Billable
10/27/2017 217342	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
11/2/2017 217907	Anna Gooding W□RK Update [redacted] with [redacted] (2.4); update [redacted] chart with [redacted] per request of [redacted] (0.6).	180.00	3.00	540.00	Billable
11/6/2017 217908	Anna Gooding W□RK Update and send [redacted] list to [redacted] counsel per request of [redacted]	180.00	0.20	36.00	Billable
11/13/2017 217910	Anna Gooding W□RK Update [redacted] with [redacted] (1.5); update [redacted] chart with [redacted] per request of [redacted] (0.3).	180.00	1.80	324.00	Billable
11/16/2017 217909	Anna Gooding W□RK Update [redacted] chart with [redacted] per request of [redacted]	180.00	1.90	342.00	Billable
11/20/2017 217911	Anna Gooding W□RK Update [redacted] list with [redacted] per request of [redacted]	180.00	1.00	180.00	Billable
11/20/2017 217904	Shinae Kim-Helms W□RK Review newly entered [redacted] and discussion with A. Gooding regarding [redacted] (0.4).	435.00	0.40	174.00	Billable
11/27/2017 217905	Shinae Kim-Helms W□RK Receive and review documents [redacted] (0.5); check [redacted] status and review [redacted] in database, review and analyze [redacted] and select and advise documents [redacted] (1.8); e-mails with S. Scarlett and A. Elder regarding [redacted] (0.4); e-mail to A. Gooding list of [redacted] (0.3).	435.00	3.00	1,305.00	Billable
11/27/2017 217916	Anna Gooding W□RK Prepare and send [redacted] (0.8); update [redacted] chart with [redacted] per request of [redacted] (0.2).	180.00	1.00	180.00	Billable
11/28/2017 217920	Shinae Kim-Helms W□RK □versee process [redacted] (0.7); e-mails with A. Elder regarding [redacted] and e-mails with K. Yi regarding [redacted] (0.5); e-mails with B. Miller regarding [redacted] and review said [redacted] (0.5); receive and review documents [redacted] by B. Miller (0.4); check [redacted] status and search for [redacted] in database (1); prepare recommended list for [redacted] and e-mail with B. Miller regarding [redacted] (0.4).	435.00	3.50	1,522.50	Billable
11/28/2017 217912	Anna Gooding W□RK Confirm [redacted] for use in Fy and □mori depositions per request of [redacted]	180.00	0.50	90.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
11/28/2017 217917	Karen Yi W□RK Update [redacted] list with [redacted] (0.30); email correspondence with translation company regarding [redacted] (0.40).	155.00	0.70	108.50	Billable
11/29/2017 217918	Karen Yi W□RK Provide [redacted] status per request of [redacted] (0.30); email correspondence with translation company regarding [redacted] (0.20).	155.00	0.50	77.50	Billable
11/29/2017 217914	Anna Gooding W□RK Email correspondence with translation company regarding [redacted] (0.2); review translations for [redacted] (0.7); format native foreign originals into PDFs (0.6); update translation status per request of [redacted] (0.5).	180.00	2.00	360.00	Billable
11/29/2017 217921	Shinae Kim-Helms W□RK □versee process to finalize outstanding certified translations with Consortra (0.7); e-mails with A. Elder regarding [redacted] and e-mails with K. Yi regarding [redacted] (0.5); review translations to be [redacted] per [redacted] (0.3); prepare and send [redacted] (0.3).	435.00	1.80	783.00	Billable
11/30/2017 217915	Anna Gooding W□RK Email correspondence with translation company regarding [redacted] (0.5); review translations for [redacted] (1.4); format native foreign originals into PDFs (0.6); update translation status per request of [redacted] (0.5).	180.00	3.00	540.00	Billable
11/30/2017 217919	Karen Yi W□RK Update [redacted] list with [redacted] (0.70); code translations on [redacted] (0.40); email correspondence with translation company regarding revisions to translations (0.40); format [redacted] original excel documents to match [redacted] (0.30); review certified translations for [redacted] (1.10); email correspondence with translation company regarding [redacted] (0.20); finalize translations (0.40); upload [redacted] to shared side (0.20).	155.00	3.70	573.50	Billable
11/30/2017 217922	Shinae Kim-Helms W□RK □versee process to finalize outstanding certified translations with Consortra (0.7); e-mails with K. Yi regarding [redacted] (0.5); e-mails with S. Scarlett regarding [redacted] and e-mails with Consortra regarding [redacted] (0.3).	435.00	1.50	652.50	Billable
12/1/2017 218005	Karen Yi W□RK Format [redacted] excel documents to match [redacted] (0.30); email correspondence with translation company regarding [redacted] (0.40); review certified translations for [redacted] (0.90); email correspondence with translation company regarding [redacted] (0.30); finalize translations (0.40); code [redacted] on [redacted] (0.30); update [redacted] list with recent [redacted] (0.60); provide translation status per request of [redacted] (0.10); upload [redacted] to shared site (0.20).	155.00	3.50	542.50	Billable
12/11/2017 218006	Anna Gooding W□RK Check translation status (0.4); add [redacted] list and [redacted] chart per request of [redacted] (0.6).	180.00	1.00	180.00	Billable
12/14/2017 218008	Anna Gooding W□RK Update [redacted] list with [redacted] per request of [redacted]	180.00	0.80	144.00	Billable
12/18/2017 218009	Anna Gooding W□RK Update [redacted] list with [redacted] per request of [redacted]	180.00	1.10	198.00	Billable
3/1/2018 218773	Shinae Kim-Helms W□RK Teleconference with A. Gooding regarding [redacted] (0.3).	450.00	0.30	135.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
3/2/2018 218775	Shinae Kim-Helms W□RK Receive and review documents requested for [redacted] by H. Rim and e-mails with H. Rim regarding [redacted] (0.6).	450.00	0.60	270.00	Billable
3/5/2018 218762	Anna Gooding W□RK Prepare and send foreign documents for [redacted] including [redacted] to make [redacted] per request of [redacted]	205.00	2.10	430.50	Billable
3/7/2018 218779	Shinae Kim-Helms W□RK Review draft email to US Legal regarding [redacted] (0.5).	450.00	0.50	225.00	Billable
3/12/2018 218781	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.3).	450.00	0.30	135.00	Billable
3/13/2018 218782	Shinae Kim-Helms W□RK □versee translation requests and finalization of outstanding certified translations requested by [redacted] (0.8).	450.00	0.80	360.00	Billable
3/14/2018 218783	Shinae Kim-Helms W□RK □versee translation requests and finalization of outstanding certified translations requested by [redacted] (0.5); review status of [redacted] (0.2).	450.00	0.70	315.00	Billable
3/15/2018 218765	Anna Gooding W□RK Update [redacted] list and [redacted] chart with [redacted] and [redacted] per request of [redacted]	205.00	0.50	102.50	Billable
3/16/2018 218766	Karen Yi W□RK Update [redacted] list with [redacted] (0.30); review certified translation for [redacted] (1.00); email correspondence with translation company regarding [redacted] (0.20); finalize translations (0.60); upload [redacted] to shared site (0.10).	170.00	2.20	374.00	Billable
3/19/2018 218786	Shinae Kim-Helms W□RK □versee translation requests and finalization of outstanding certified translations requested by [redacted] (0.4); review status of [redacted] and e-mail with K. Yi regarding same (0.2).	450.00	0.60	270.00	Billable
3/20/2018 218787	Shinae Kim-Helms W□RK □versee translation requests and finalization of outstanding certified translations requested in preparation (0.7).	450.00	0.70	315.00	Billable
4/9/2018 219077	Karen Yi W□RK Review certified translations for [redacted] (0.20); finalize translations (0.10).	170.00	0.30	51.00	Billable
4/17/2018 219075	Anna Gooding W□RK Verify total number of certified translations for [redacted] per request of [redacted]	205.00	0.70	143.50	Billable
4/18/2018 219076	Anna Gooding W□RK Update [redacted] and [redacted] chart with [redacted] per request of [redacted]	205.00	0.90	184.50	Billable
5/8/2018 219179	Anna Gooding W□RK Send [redacted] to translation company per request of [redacted]	205.00	0.10	20.50	Billable
5/10/2018 219180	Anna Gooding W□RK Email correspondence with translation company regarding [redacted] (0.2);	205.00	1.00	205.00	Billable

244/Ion Batteries(7): (continued)

Date ID	Timekeeper Task	Rate Markup □	Hours DNB Time	Amount DNB Amt	Total
	review translations for [redacted] (0.3); finalize recertified translations (0.2); update [redacted] list (0.2); upload [redacted] to shared folder per request of [redacted] (0.1).				
Total: W□RK			238.60		$64,101.50
T□TAL	Billable Fees		238.60		$64,101.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$64,101.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$64,101.50
Total New Balance		$64,101.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	205.00	5.30	$1,086.50	$1,086.50	0.00
AG	180.00	98.90	$17,802.00	$17,802.00	0.00
EM	155.00	30.10	$4,665.50	$4,665.50	0.00
KY	170.00	2.50	$425.00	$425.00	0.00
KY	155.00	15.10	$2,340.50	$2,340.50	0.00
SK	450.00	4.50	$2,025.00	$2,025.00	0.00
SK	435.00	82.20	$35,757.00	$35,757.00	0.00

Nickname 244/Ion Battery (11) □Strategy/Mgmt
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
Activity: W□RK					
3/20/2017 215095	Shinae Kim-Helms W□RK Receive and review draft deposition exhibit index prepared by A. Gooding (0.5); e-mails with A. Gooding regarding [redacted] (0.5).	435.00	1.00	435.00	Billable
3/21/2017 215132	Shinae Kim-Helms W□RK Review and analyze deposition exhibit index and exhibits entered by DAPs (1); teleconference with and follow up e-mails with A. Gooding regarding [redacted] (0.6); draft email to lead counsel regarding [redacted] (0.3).	435.00	1.90	826.50	Billable
5/10/2017 215655	Shinae Kim-Helms W□RK Analysis of case management issues and review of batch assignment charts per D. Lambrinos (0.4); e-mails with D. Lambrinos regarding [redacted] (0.2).	435.00	0.60	261.00	Billable
5/11/2017 215657	Shinae Kim-Helms W□RK Teleconference with N. Cihlar regarding [redacted] (0.2); e-mails and teleconferences with J. Schmitt and M. Hastings regarding [redacted] (0.6); prepare chart summarizing status of [redacted] lodged by Defendants and Plaintiffs to date per D. Lambrinos (0.8).	435.00	1.60	696.00	Billable
5/15/2017 215659	Shinae Kim-Helms W□RK Teleconferences and e-mails with M. Hastings regarding [redacted] (0.5); e-mails with D. Lambrinos regarding [redacted] (0.2).	435.00	0.70	304.50	Billable
5/16/2017 215661	Shinae Kim-Helms W□RK E-mails with M. Hastings [redacted] (0.5); review of DAPs translations entered with Declaration [redacted] (0.5); e-mails with A. Gooding regarding [redacted] (0.3).	435.00	1.30	565.50	Billable
5/17/2017 215663	Shinae Kim-Helms W□RK E-mails with Catalyst and D. Lambrinos regarding [redacted] (0.5); search for reviewers [redacted] per D. Lambrinos (0.5); forward to and e-mail with D. Lambrinos regarding [redacted] (0.2).	435.00	1.20	522.00	Billable
5/18/2017 215665	Shinae Kim-Helms W□RK Conduct case management at request of D. Lambrinos including: e-mail with M. Hastings regarding [redacted] 0.8), perform [redacted] (1.1), search for [redacted] (0.5), e-mails with B. Johnson regarding K. Kitchens credentials (0.1), e-mails with J. Prince regarding [redacted] (0.5); prepare [redacted] report for H. Cunningham (0.8), review exhibits entered by DAPs in Shimokomaki deposition (0.5), prepare user [redacted] report for [redacted] (2.2); e-mails with A. Gooding regarding [redacted] (0.4); review deposition exhibit index updated by A. Gooding (0.3); e-mail with V. Glaze regarding [redacted] (0.2).	435.00	7.40	3,219.00	Billable
5/19/2017 215666	Shinae Kim-Helms W□RK Conduct case management including review and search for [redacted] in database per J. Anderson (0.5); e-mails with Catalyst and J. Anderson regarding [redacted] (0.3); e-mails with J. Prince for [redacted] (0.3); prepare user trail report for J. Shannon per M. Caylao (0.8); prepare [redacted] reports for [redacted] per J. Anderson (1.5); prepare [redacted] reports for [redacted] per B. Johnson per J. Anderson (2); e-mails with B. Johnson and J. Prince regarding [redacted] (0.2).	435.00	5.60	2,436.00	Billable
5/22/2017 215667	Shinae Kim-Helms W□RK Prepare [redacted] reports for [redacted] per B. Johnson (1.6); e-mails with J. Anderson and B. Johnson regarding [redacted] (0.1); prepare [redacted] reports for [redacted] per J. Anderson (0.5); prepare [redacted] reports for [redacted] per J. Anderson (1.5); e-mails with J. Anderson and K. Good regarding [redacted] (0.1).	435.00	3.80	1,653.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
5/25/2017 215670	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	E-mails with B. Troxel regarding [redacted] (0.5).				
6/5/2017 216173	Shinae Kim-Helms W□RK	435.00	0.90	391.50	Billable
	Review Dynapack website per D. Lambrinos (0.5); e-mails with D. Lambrinos regarding [redacted] (0.2); review summaries of [redacted] found by T. Lee (0.2).				
6/6/2017 216176	Shinae Kim-Helms W□RK	435.00	0.40	174.00	Billable
	Prepare cost estimates for potential exhibits per D. Lambrinos (0.3); e-mails with Consortra regarding [redacted] per D. Lambrinos (0.1).				
6/7/2017 216177	Shinae Kim-Helms W□RK	435.00	0.60	261.00	Billable
	Review administrative motion filed (0.2); e-mails with Consortra and D. Lambrinos regarding [redacted] (0.2); e-mail to A. Gooding to [redacted] (0.2).				
6/8/2017 216178	Shinae Kim-Helms W□RK	435.00	0.20	87.00	Billable
	E-mails with D. Lambrinos regarding [redacted].				
6/15/2017 216181	Shinae Kim-Helms W□RK	435.00	1.60	696.00	Billable
	Continue and finalize preparing informal translation (0.8); e-mails with A. Gooding regarding [redacted] (0.30); format [redacted] in Excel for printing (0.5).				
6/28/2017 216187	Shinae Kim-Helms W□RK	435.00	0.60	261.00	Billable
	E-mails with T. Lee, A. Gooding and D. Lambrinos regarding [redacted] (0.3); e-mails with D. Lambrinos regarding [redacted] (0.3).				
7/10/2017 216523	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	Discussion on [redacted] with co-counsel including D. Lambrinos, T. Lee, and L. Chan and review correspondence from Defendants on [redacted] (0.5).				
7/12/2017 216527	Shinae Kim-Helms W□RK	435.00	1.40	609.00	Billable
	Analysis of [redacted] invoice and itemized statement per L. Chan (1.2); e-mail summary to L. Chan regarding [redacted] (0.2).				
7/28/2017 216546	Shinae Kim-Helms W□RK	435.00	0.50	217.50	Billable
	Review [redacted] invoices and [redacted] per L. Chan (0.5).				
7/31/2017 216547	Shinae Kim-Helms W□RK	435.00	0.90	391.50	Billable
	E-mails with V. Glaze regarding [redacted] (0.2); e-mails with A. Gooding regarding [redacted] and review [redacted] (0.5); e-mail discussion with H. Rim regarding [redacted] (0.2).				
8/4/2017 216796	Shinae Kim-Helms W□RK	435.00	0.20	87.00	Billable
	Teleconference with V. Glaze regarding [redacted] (0.2).				
8/16/2017 216813	Shinae Kim-Helms W□RK	435.00	0.30	130.50	Billable
	Teleconference with V. Glaze regarding [redacted] (0.3).				
9/20/2017 217047	Shinae Kim-Helms W□RK	435.00	1.20	522.00	Billable
	Review and [redacted] from [redacted] per L. Chan (0.6); teleconference with L. Chan regarding [redacted] (0.3); e-mails with B. Troxel regarding [redacted]				

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup	Hours / DNB Time	Amount / DNB Amt	Total
	(0.3).				
9/21/2017 217049	Shinae Kim-Helms W□RK E-mails with B. Troxel regarding [redacted] (0.2).	435.00	0.20	87.00	Billable
11/2/2017 217906	Carla Voigt W□RK Email exchange with B. Straus regarding [redacted] (0.20).	340.00	0.20	68.00	Billable
1/3/2018 218197	Anna Gooding W□RK Update [redacted] list and [redacted] list with recently [redacted] per request of [redacted]	180.00	2.00	360.00	Billable
1/3/2018 218199	Shinae Kim-Helms W□RK Review updated [redacted] prepared by A. Gooding and exhibits entered by [redacted] plaintiffs (0.8).	435.00	0.80	348.00	Billable
1/4/2018 218189	Anna Gooding W□RK Update [redacted] list and [redacted] list with recently entered deposition exhibits per request of [redacted]	180.00	0.50	90.00	Billable
2/12/2018 218329	Shinae Kim-Helms W□RK Receive and review email from L. Chan regarding [redacted] and teleconference with N. Cihlar regarding [redacted] (0.5).	435.00	0.50	217.50	Billable
4/18/2018 219072	Shinae Kim-Helms W□RK E-mails with H. Rim regarding [redacted] (0.3).	465.00	0.30	139.50	Billable
4/26/2018 219073	Shinae Kim-Helms W□RK Review and receive documents for [redacted] translation from H. Rim and e-mails with H. Rim regarding [redacted] (0.4).	465.00	0.40	186.00	Billable
5/1/2018 219171	Shinae Kim-Helms W□RK Review and revise [redacted] Index per J. Decena (0.5).	465.00	0.50	232.50	Billable
5/3/2018 219172	Shinae Kim-Helms W□RK Receive and review [redacted] prepared by Consortra (0.3); forward to H. Rim for [redacted] (0.2).	465.00	0.50	232.50	Billable
5/14/2018 219174	Shinae Kim-Helms W□RK Review revision proposed by [redacted] to draft translation (0.3).	465.00	0.30	139.50	Billable
5/15/2018 219175	Shinae Kim-Helms W□RK □versee certified translation process (0.2).	465.00	0.20	93.00	Billable
7/2/2018 220113	Joshua Callister W□RK Review [redacted] from lead counsel (0.2); email correspondences with co-counsel, E. Pickar (SD), M. Reich (CA), B. Straus (MA), [redacted] (0.4); teleconference with E. Pickar regarding [redacted] (0.2).	345.00	0.80	276.00	Billable
7/28/2018 220215	Shinae Kim-Helms W□RK Confer with L. Chan regarding [redacted] (0.2); review email request from H. Rim regarding [redacted] (0.2); teleconferences with Consortra regarding [redacted] (0.4); prepare and send email [redacted] (0.7); review and finalize corrected certified translation (0.4).	465.00	1.90	883.50	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup □	Hours / DNB Time	Amount / DNB Amt	Total
8/3/2018 220503	Shinae Kim-Helms W□RK Receive and review request for [redacted] and e-mails with L. Chan regarding [redacted] (0.3); oversee request to Consortra regarding [redacted] (0.2).	465.00	0.50	232.50	Billable
8/7/2018 220504	Shinae Kim-Helms W□RK □versee finalization of certified translation requested by L. Chan (0.3).	465.00	0.30	139.50	Billable
9/18/2018 220567	Shinae Kim-Helms W□RK Receive and review Defendants' objections to translations entered in [redacted] depositions and [redacted] (0.5).	465.00	0.50	232.50	Billable
9/24/2018 220568	Anna Gooding W□RK Update [redacted] chart and [redacted] list (0.7); compare and pull objected-to [redacted] depo exhibits per request of [redacted] (0.4).	205.00	1.10	225.50	Billable
11/1/2018 220850	Shinae Kim-Helms W□RK E-mails with A. Gooding regarding [redacted] and e-mails with H. Rim regarding [redacted] (0.5).	465.00	0.50	232.50	Billable
11/2/2018 220851	Shinae Kim-Helms W□RK E-mails with A. Gooding regarding [redacted] and e-mails with H. Rim regarding [redacted] (0.4).	465.00	0.40	186.00	Billable
11/6/2018 220852	Shinae Kim-Helms W□RK Identify requestors of certified translations [redacted] (0.5).	465.00	0.50	232.50	Billable
11/7/2018 220853	Shinae Kim-Helms W□RK Confer with A. Gooding regarding [redacted] (0.5).	465.00	0.50	232.50	Billable
11/7/2018 220854	Anna Gooding W□RK Locate and identify translated documents per request of [redacted] (1.2); udpate [redacted] list [redacted] per request of [redacted] (0.8).	205.00	2.00	410.00	Billable
Total: W□RK			50.30		$20,658.00
T□TAL	Billable Fees		50.30		$20,658.00

Total of billable expense slips $0.00

	Amount	Total
Total of Fees (Time Charges)		$20,658.00
Total of Costs (Expense Charges)		$0.00
Total new charges		$20,658.00
Total New Balance		$20,658.00

244/Ion Battery (11): (continued)

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	205.00	3.10	$635.50	$635.50	0.00
AG	180.00	2.50	$450.00	$450.00	0.00
CV	340.00	0.20	$68.00	$68.00	0.00
JC	345.00	0.80	$276.00	$276.00	0.00
SK	465.00	7.30	$3,394.50	$3,394.50	0.00
SK	435.00	36.40	$15,834.00	$15,834.00	0.00

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation

STRAUS & BOIES, LLP

Expense Summary

June 1, 2013 through April 1, 2019

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
STRAUS & BOIES, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$125,000.00
Court Fees (Filing, etc.)	$0.00
Experts/Consultants	$0.00
Online document database	$0.00
Federal Express	$33.41
Hearing Transcripts	$0.00
Investigation	$0.00
Lexis/Westlaw	$456.62
Messenger/Delivery	$0.00
Photocopies – In House (capped at $0.20 per copy)	$112.80
Photocopies – Outside	$0.00
Postage	$0.00
Service of Process	$0.00
Special Supplies	$0.00
Telephone/Telecopier	$6.82
Travel	$0.00
Miscellaneous	$0.00
TOTAL:	$125,609.65

EXHIBIT 62

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF NATHAN M. CIHLAR IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF STRAUS & BOIES, LLP**

I, Nathan M. Cihlar, declare:

1. I am partner of Straus & Boies, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to William Cabral, Scott Beall, Theodore Wolfendale, Christopher Bessette, Tom Pham, Kathleen Tawney, and Calvin Calkins and as counsel for IPPs throughout the course of this litigation. The background and experience of Straus & Boies, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Straus & Boies, LLP performed the following tasks among others:

- Straus & Boies, LLP was part of a leadership team tasked with designing the infrastructure to process the discovery produced by defendants. This included assisting in the creation of the coding manual, the coding panes in the review platform, and developing, implementing and managing the strategy and procedures for the electronic review platforms. As one of the few Korean-speaking attorneys, Shinae Kim-Helms of my firm led the initial review of Korean documents and identified evidence for use at depositions and by the experts in preparation for class certification and trial. My firm created specialized foreign language searches and coordinated with other Plaintiff groups regarding production issues.

- Straus & Boies, LLP oversaw the translation process for foreign language materials produced by Defendants and their co-conspirators, which involved regular coordination with Co-Lead Counsel and the deposition and briefing teams. My firm was also the liaison between Co-Lead Counsel and the various translation certification companies. In this role, we served as the gatekeepers for translation requests, evaluating the documents before sending them for translation and preventing duplicate or unnecessary translations from being requested or entered into the record. As part of this process, we performed quality control to ensure all translations conformed to the translation protocol and that material deemed necessary for use as evidence in briefing, deposition, and trial, was appropriately certified. In this regard, Straus

& Boies was responsible for raising and defending countless translation objections, which involved regularly meeting and conferring with defendants and close coordination with Direct Purchaser Plaintiffs to ensure consistency and accuracy wherever practicable. For efficiency, Straus & Boies maintained current charts tracking the progress of translations and objections as well as deposition exhibits.

- Straus & Boies assisted in deposition preparation of numerous witnesses. In helping to prepare for depositions of defense witnesses, we were responsible for locating, analyzing, and compiling relevant foreign language materials and translations. In addition, attorneys from Straus & Boies assisted in coordinating the preservation and production efforts for the named class representatives and worked with local counsel to prepare for their depositions.

- Straus & Boies assisted Co-Lead Counsel in the research and drafting of the opposition brief in response to Sony's motion to dismiss.

5. Attached hereto as **Exhibit B** is a billing summary of Straus & Boies, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Straus & Boies, LLP during this period of time was 6224.80 with a corresponding lodestar based on current rates of $2,134,794.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Straus & Boies, LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Straus & Boies, LLP has incurred during the course of this litigation. Straus & Boies, LLP expended a total of $125,637.85 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Straus & Boies, LLP on a contingent basis and

have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Straus & Boies, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 in Fairfax, Virginia.

Nathan M. Cihlar

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

STRAUS & BOIES, LLP FIRM BIOGRAPHY

Straus & Boies, LLP is widely recognized as a leading law firm in the fields of antitrust and consumer protection class action litigation. With offices in Virginia, California, Tennessee, and Colorado, the firm's lawyers have successfully prosecuted antitrust and consumer protection claims in federal and state courts throughout the United States.

Founded in 1995, the firm has been at the forefront of national efforts to bring to heel corporations engaged in restraints of trade, consumer fraud, and other unlawful conduct. The firm has been lead counsel in some of the largest class actions in the past decade, including the vitamins and DRAM litigations. More recently, Straus & Boies lawyers have led litigation efforts against manufacturers of agricultural and refrigeration products for violations of competition laws and a major insurance carrier for breach of its fiduciary duty to a certified class of policyholders. Recognized by courts, private practitioners, and law enforcement authorities throughout the United States as competent, experienced, and vigilant, Straus & Boies lawyers have recovered hundreds of millions of dollars for consumers and businesses.

The Firm's Attorneys

David Boies

Mr. Boies is Senior Partner at Straus & Boies. His practice is focused on representing individuals and businesses in antitrust and consumer protection litigation in state and federal courts. Mr. Boies has a national reputation in the indirect purchaser antitrust litigation realm, and has served as a speaker and panelist for the American Bar Association and other legal organizations. Mr. Boies has served as sole lead or co-lead counsel in numerous antitrust and consumer protection class actions. He is admitted to practice in all state and federal courts in the Commonwealth of Virginia, as well as the United States Courts of Appeals for the Fourth and Tenth Circuits.

Mr. Boies obtained his bachelor's degree from the University of Redlands and his law degree from William & Mary Law School (J.D. 1991). Prior to joining the Firm, Mr. Boies represented individuals and corporations as an attorney in the Washington, D.C. offices of national law firms in the practice areas of corporate litigation, international trade, and white collar criminal defense.

Timothy D. Battin

Mr. Battin, the managing partner at Straus & Boies, LLP, has a wealth of experience in complex litigation. He has served as lead counsel in numerous antitrust and consumer protection class actions in state and federal courts around the country, resulting in recoveries of hundreds of millions of dollars for consumers. Mr. Battin has prosecuted cases across a broad spectrum of industries, including, pharmaceuticals, food additives, vitamins, agricultural and computer-based products. He currently serves as lead or co-lead counsel in a number of cases including:

- ***Northwestern Mutual Insurance Litigation***. Mr. Battin served as co-lead counsel in

state and federal court actions alleging that Northwestern Mutual Life Insurance Company breached its contractual and fiduciary duties to owners of certain investment annuities it issued. This case was litigated in multiple jurisdictions and was ultimately settled for $84 million.

- ***Dynamic Random Access Memory Antitrust Litigation***. Mr. Battin served as co-lead counsel in state and federal court actions alleging price fixing among makers of computer memory chips. Settlements totaling more than $300 million were approved in the United States District Court for the Northern District of California.
- ***Processed Egg Products Antitrust Litigation***. Mr. Battin serves as co-lead counsel for indirect purchasers alleging a market allocation scheme in the egg industry.

Mr. Battin, a recognized authority on the prosecution of class actions, has lectured on issues of coordination between attorneys general and private lawyers in class cases. He serves on a Rule 23 Subcommittee for the District of Columbia Rules Advisory Committee. Mr. Battin obtained his undergraduate degree in business from Old Dominion University (B.S. 1987) and his law degree from the College of William & Mary (J.D. 1990). He is a member of the bars of the District of Columbia, Virginia, and Missouri (inactive) and is also admitted to practice before the United States District Courts for the Eastern District of Virginia, Eastern District of Michigan and the District of Columbia, and the United States Courts of Appeals, Fourth and District of Columbia Circuits.

Mark J. Schirmer

Mr. Schirmer is a partner in the Tennessee office of Straus & Boies. He has approximately thirty years experience prosecuting and defending civil and criminal actions

arising out of complex business transactions in courts and before regulatory agencies throughout the country.

Mr. Schirmer served as Senior Trial Attorney in the Eastern Regional office of the U.S. Commodity Futures Trading Commission and served on a number of bar committees concerned with litigation involving financial professionals and financial transactions. He is admitted to the bars of New York and Tennessee, and is admitted to practice before the United States Courts of Appeals for the Fourth, Sixth and Eleventh Circuits, and the United States District Courts for the Southern and Eastern Districts of New York, the Eastern District of Michigan and the Western District of Tennessee. He is a graduate of Fordham University's School of Law and Macalester College.

Nathan M. Cihlar

Mr. Cihlar is a partner in the Virginia office of Straus & Boies. Throughout his career, he has prosecuted complex and class action litigation with a focus on antitrust, consumer protection and product liability claims. Since joining the firm, Mr. Cihlar has been highly involved in the litigation of numerous large, multi-faceted nationwide cases from inception to conclusion. He has served in prominent roles in the litigation of, among others, antitrust class actions against the manufacturers of Dynamic Random Access Memory, monosodium glutamate, polyester staple, oriented strand board, LCD panels, and Cathode Ray Tubes. Mr. Cihlar has significant experience with litigation involving international defendants and foreign language issues. He has served in foreign language leadership committee roles in both the LCD and CRT litigations. In doing so, he has successfully represented numerous plaintiff classes and helped recover hundreds of millions of dollars for consumers.

Mr. Cihlar obtained his bachelor's degree from Georgetown University (B.S. Finance and

Marketing 1999), and his law degree from William & Mary Law School (J.D. 2004). While at William & Mary, Mr. Cihlar was a member of the Environmental Law Journal. He is admitted to practice in Virginia, the District of Columbia and before the United States District Court for the Eastern District of Virginia.

Christopher V. Le

Christopher Le is a partner in the Virginia office. Since joining Straus & Boies in 2007, Mr. Le has played key roles in numerous class cases, including LaPlant v. Northwestern Mutual Life Insurance Company, In Re Dynamic Random Access Memory Antitrust Litigation, In Re Processed Eggs Antitrust Litigation, In Re Packaged Seafood Antitrust Litigation, and In Re Broilers Chicken Antitrust Litigation. Mr. Le has particular experience with the antitrust issues involved with food and agriculture.

Mr. Le obtained his bachelor's degree from The University of Virginia (B.A. 2004) and his law degree from Case Western Reserve University (J.D. 2007, *cum laude*). While at Case Western, Mr. Le was a member of the Mock Trial and Negotiation Competition Teams. He is admitted to practice in Virginia and the District of Columbia. Mr. Le is fluent in French.

Barry Boughman

Mr. Boughman served as an Assistant United States Attorney for the District of Colorado from 1986 to 1988, when he entered private practice. He also served as Law Clerk for the Honorable Michael R. Enwall, District Court Judge for the 20th Judicial District in Boulder, Colorado from 1984 to 1985. He obtained his bachelor's degree from the University of Northern Colorado (B.A. 1980) and his law degree from the University of Colorado School of Law (J.D. 1984). He is admitted to practice in Colorado as well as before the United States Court of Appeals for the Tenth Circuit and the United States District Court for the District of Colorado.

Steven M. Feder

Mr. Feder obtained his bachelor's degree from Miami University (Ohio) (B.S. 1982) and his law degree from the University of Colorado School of Law (J.D. 1985, Order of the Coif). He is admitted to practice in Colorado and Illinois, as well as before the United States Supreme Court, the United States Court of Appeals for the Tenth Circuit, and the United States District Courts for the Districts of Colorado and Connecticut. He served as a prosecutor in Colorado's Eighteenth Judicial District from 1985 to 1990, before entering private practice.

Shinae Kim-Helms

Ms. Kim-Helms represents consumers and businesses in cases involving price fixing, monopolization, and other anticompetitive practices. Prior to joining Straus & Boies LLP, Ms. Kim-Helms worked on cases involving patent and trademark infringement. Since joining the firm in 2010, Ms. Kim-Helms has been involved in litigating cases against the manufacturers of LCD panels, cathode ray tubes, lithium ion batteries, and auto parts.

Ms. Kim-Helms obtained her bachelor's degree from Seoul National University (B.S. Agrobiology), her master's degree from Yonsei University (M.S. Biochemistry) and her law degree from Golden Gate University, School of Law (J.D. 2005). Ms. Kim Helms' article on licensing agreements was published in Les Nouvelles, a quarterly licensing journal published by the Licensing Executives Society. Ms. Kim-Helms is fluent in Korean and Japanese. She is admitted to practice in California and before the United States District Court for the Northern District of California and the United States Patent and Trademark Office.

Scott M. Dinner

Mr. Dinner is an associate attorney working in the Virginia office. He practices complex and class action litigation with a primary focus on antitrust claims. Mr. Dinner joined the firm in

2013 following his graduation from the University of Virginia School of Law. While in law school, Mr. Dinner was a quarterfinalist in the William Minor Lile Moot Court Competition. During this time, he also received numerous awards for his research and writing skills, including the Fulbright & Jaworksi Best Memo Award and the McGuireWoods Best Brief Award.

Carla Voigt

Ms. Voigt is an associate attorney working in the Virginia office. She practices complex and class action litigation with a primary focus on antitrust claims. Ms. Voigt joined the firm in 2014 following her graduation from the George Washington University Law School. While in law school, Ms. Voigt was a quarterfinalist in the First Year Negotiations Skills Competition. She also served as a Dean's Fellow, was a managing editor of the Federal Communications Law Journal, and has an article published in that journal. She is admitted to practice in Virginia.

Former Straus & Boies Attorneys

Michael Straus

Mr. Straus, a founding member of the firm, is now retired from the practice of law.

Mr. Straus graduated from Columbia College (A.B. 1972), Columbia University (M.A. 1975) and New York University School of Law (J.D. 1980, cum laude, Order of the Coif). He remains a member in good standing of the bars of the States of Alabama and New York. Mr. Straus clerked for the Honorable John R. Bartels, Senior United States District Judge for the Eastern District of New York from 1980-1981. He then worked at The Hague as Staff Counsel for the Iran-United States Claims Tribunal from 1981-1983. Mr. Straus also served as an Adjunct Professor at the University of Alabama School of Law, teaching on transnational litigation issues.

Thomas M. Palumbo

Mr. Palumbo has not been employed at Straus & Boies since February of 2015.

Mr. Palumbo's practice focused on complex and class action litigation, primarily in the areas of antitrust, consumer protection, and products liability. Since joining the Firm as an associate in 2007, Mr. Palumbo was involved in litigating cases against the manufacturers of polyester staple, aspartame and various technologies including flash memory, static random access memory (SRAM), thin film transistor liquid crystal display (TFT-LCD) panels and cathode ray tubes (CRT).

Mr. Palumbo obtained his bachelor's degree from George Mason University (B.A. International Studies 2001) and his law degree from the George Mason University School of Law (J.D. 2007). He is admitted to practice in Virginia and the District of Columbia.

Partial List of Recent Cases In Which Straus & Boies, LLP Has served As Lead Counsel

Dynamic Random Access Memory (DRAM)

Straus & Boies, LLP, served as co-lead counsel in these coordinated multi-state proceedings against the manufacturers of Dynamic Random Access Memory chips (DRAM) for the violation of various state's antitrust/consumer protection laws. It was alleged that the DRAM manufacturers entered into and engaged in a conspiracy in the United States and elsewhere to suppress and eliminate competition by fixing the prices of DRAM. Straus & Boies, LLP prosecuted the claims of indirect purchasers of DRAM since October 2004. Through the work of Straus & Boies, LLP and its co-lead counsel, indirect purchasers were able to reach settlements with all defendants totaling more than $300 million. These settlements were approved by the United States District Court for the Northern District of California in June 2016.

Northwestern Mutual Life Insurance Annuity Litigation

Straus & Boies served as co-lead counsel on behalf of thousands of purchasers of Northwestern Mutual Life Insurance Company ("Northwestern") annuities. The lawsuit accused Northwestern of deliberately stripping annuity policyholders of their dividend rights. Straus & Boies litigated the case in multiple jurisdictions. The case went to trial, where Straus & Boies' clients won a verdict on all material issues. Ultimately, the case settled for $84 million.

Vitamins

As lead counsel in coordinated multi-state proceedings of more than 50 indirect purchaser classes and *parens patriae* actions filed in 23 separate state jurisdictions against the international manufacturers of bulk vitamins, Straus & Boies negotiated and finalized a series of settlements with the defendants. The first settlement secured by Straus & Boies was at that time the largest

ever indirect purchaser antitrust settlement. Straus & Boies's efforts in successfully resolving the state vitamins indirect purchaser actions included structuring, implementing, and leading coordinated alternative dispute resolution proceedings sanctioned by state courts throughout the country, and involving scores of plaintiffs' counsel, numerous counsel for foreign and domestic defendants, and the State Attorneys General.

Food Additives

As sole lead counsel for more than 10 indirect purchaser state class action claims filed across the country, Straus & Boies effectively advanced the claims of indirect purchasers against the manufacturers of food additives for an illegal price-fixing conspiracy that affected consumer prices for well over a decade. The cases allege that the major manufacturers of certain food additives conspired to fix prices during the period January 1, 1990 through 2002. Straus & Boies received final approval of a global settlement which provided millions to the affected class members.

Eggs

Straus & Boies, LLP is co-lead counsel of indirect purchasers across the country and in 17 jurisdictions alleging a conspiracy to fix the prices of eggs. This litigation, which began in late 2008, includes complicated claims reaching back almost ten years in a multi-billion dollar industry.

Partial List of Other Actions
Prosecuted by Straus & Boies

Price-fixing actions

Monosodium Glutamate

1. *Ashley v. Archer Daniels Midland Co., et al*., Circuit Court of DeKalb County, Alabama, CV-95-336, **Co-lead Counsel**.

2. *Caldwell, et al. v. Archer Daniels Midland Co., et al.,* Circuit Court of Coosa County, Alabama, Civil Action No. CV-96-17, **Co-lead Counsel**.

3. *Madelon J. Lief, et al. v. Archer Daniels Midland Co.*, Circuit Court of Dan County, Wisconsin, Civil Docket No. 02CV3697.

Vitamins

4. *Donaldson, et al. v. Degussa Huls Corporation, et al.,* Circuit Court of Cullman Co. Alabama, C.A. No. 99-406, **Co-lead Counsel**.

5. *Giral, et al. v F. Hoffman LaRoche Ltd., et. al.*, Superior Court of the District of Colombia, Civil Division, Case No. 0007467-98, **Lead Counsel**.

6. *Graham v. Hoffman LaRoche, et al.,* Superior Court for the State of California, County of Yolo, No. CV 98-00046, J.C.C.P. No. 4076, **Executive Committee**.

7. *Shaklee Corp. v. Degussa-Huls Corp, et al.,* Superior Court of San Francisco County, California, Case No. 308636, J.C.C.P. Nos. 4090 and 4096.

8. *In re Vitamins Antitrust Litigation,* United States District Court for the District of Columbia, MDL 1285, **Executive Committee and Liaison Counsel**.

Pharmaceuticals

9. *In re Brand-Name Prescription Drugs Antitrust Litigation*, United States District Court for the Northern District of Illinois, MDL 997.

10. *In re Ciprofloxacin Hydrochloride Antitrust Litigation*, United States District Court for the Eastern District of New York, MDL 1383.

11. *Drug Mart Pharmacy Corporation v. Abbot Laboratories, et al*., Supreme Court of the State of New York, County of Kings, No. 29126-99.

12. *Durrett v. The Upjohn Co., et al.,* Circuit Court of Tuscaloosa County, Alabama, Civil Action No. CV-97-170, **Co-lead Counsel**.

13. *Goda, et al. v. Abbott Laboratories, Inc.,* Superior Court for the District of Columbia, Civil Docket No. 01445-96.

14. *Holdren, et al. v. Abbott Laboratories, Inc.,* District Court of Johnson County, Kansas, Case No. 96C15994.

15. *Huggins, et al. v. Abbott Laboratories, Inc., et al.,* Circuit Court for Chambers County, Alabama, Case No. CV-96-024-Cl.

16. *Karofsky v. Abbott Laboratories, Inc., et al.,* Superior Court of Cumberland County, Maine, Civil Docket No. 95-1009.

17. *Kerr v. Abbott Laboratories, Inc., et al.,* District Court of Hennepin County, Minnesota, No. MC-96-002837.

18. *Long v. Abbott Laboratories, Inc., et al.,* General Court of Justice Superior Court Division for Mecklenburg County, North Carolina, Civil Action No. 97 CVS 8289.

19. *McLaughlin, et al. v. Abbott Laboratories, Inc.,* Superior Court for Yavapai County, Arizona, No. 1-CA-SA-96-0215.

20. *Meyers v. Abbott Laboratories, Inc., et al.,* Circuit Court for Davidson County, Tennessee, No. 970612.

21. *Scholfeld v. Abbott Laboratories, Inc., et al.,* District Court for Dane County, Wisconsin, No. 96-CV-0460.

22. *Wood v. Abbott Laboratories, Inc., et al.,* Circuit Court of Oakland County, Michigan, No. 96-5125610CZ.

23. *Yasbin, et al. v. Abbott Laboratories, Inc.,* Circuit Court for the Eleventh Judicial District for Dade County, Florida, C.A. No. 97-1141-CA 03.

Vitamin C

24. *Audette v. Hebei Welcome Pharmaceutical Co. Ltd., et al.,* Commonwealth of Massachusetts, Case No. 2005-00182-C.

25. *In re Vitamin C Antitrust Litigation,* United States District Court for the Eastern District of New York, MDL No. 1738, **Co-Lead Counsel**.

Polyester

26. *Augusta Sullivan and Rose Marie Farina v. Wellman, Inc., et al.*, Commonwealth of Massachusetts, Case No. 02-4872 C.

27. *Briscoe, et al. v. DuPont E.I. Nemours & Co., et al.,* Superior Court for the District of Columbia, C.A. No. 02ca0010508.

28. *Polyester Staple Cases*, Superior Court of California, Judicial Council Coordination Proceeding No.: JCCP No. 4278.

29. *Thomaston Mills, Inc., et al. v. DuPont E.I. Nemours & Co., et al.*, United States District Court for the Western District of North Carolina, Civil Action No. 3:02-CV-474-V.

DRAM Microchips

30. *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation,* United States District Court for the Northern District of California, MDL No. 1486, **Co-Lead Counsel**.

31. *Hamilton v. Elpida Memory Inc., et al,* Commonwealth of Massachusetts, County of Suffolk, The Superior Court, Case No. 04-3264.

Air Industry

32. *In re Air Cargo Shipping Services Antitrust Litigation,* United States District Court for the Eastern District of New York, Case No. 06-MD-1775.

33. *In re American Airlines Antitrust Litigation,* United States District Court for the District of Kansas, Case No. 99-1187-MLB, **Chair of Executive Committee**.

34. *In re International Air Transportation Surcharge Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 06-cv-1793.

35. *McCoy-Johnson, et al. v. Northwest Airlines, Inc. and Northwest Airlines Corp.,* United States District Court for Western District of Tennessee, Western Division, No. 99-2994 GV, **Chair of Executive Committee**.

Aspartame

36. *In re Aspartame Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, No. 06-CV-1732, **Co-lead Counsel.**

Other Products and Industries

37. *In re Broiler Chicken Antitrust Litigation*, United States District Court for the Northern District of Illinois, Case No. 16-cv-08637.

38. *In re Packaged Seafood Products Antitrust Litigation*, United States District Court for the Southern District of California, MDL 2670.

39. *In re Disposable Contact Lens Antitrust Litigation*, United States District Court for the Middle District of Florida, Jacksonville Division, MDL 2626.

40. *In re Blue Cross Blue Shield Antitrust Litigation*, United States District Court for the Northern District of Alabama, Southern Division, Case No. 13-cv-20000, MDL 2406.

41. *In re Lithium Ion Batteries Antitrust Litigation*, United States District Court for the Northern District of California, Oakland Division, MDL 2420.

42. *In re Automotive Parts Antitrust Litigation,* United States District Court for the Eastern District of Michigan, Southern Division, Case No. 12-cv-2311.

43. *In re Cathode Ray Tube (CRT) Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 07-cv-5944.

44. *In re Citric Acid Antitrust Litigation*, United States District Court for the Northern District of California, MDL 1092.

45. *In re Commercial Tissue Products*, United States District Court for the Northern District of Florida, Gainesville Division, MDL 1189, Case No. 97-CV-128.

46. *In re Flash Memory Antitrust Litigation,* United States District Court for the Northern District of California, Case No. 07-cv-086.

47. *In re Foreign Currency Conversion Fee Antitrust Litigation*, United States District Court for the Southern District of New York, MDL 1409.

48. *In re High Fructose Corn Syrup Antitrust Litigation*, United States District Court for the Central District of Illinois, MDL 1087.

49. *In re Methionine Antitrust Litigation,* United States District Court for the Northern District of California, MDL 1311.

50. *In re Online DVD Rental Antitrust Litigation*, Unites States District Court for the Northern District of California, MDL 2029.

51. *In re OSB Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, Case No. 06-826, **Co-lead Counsel.**

52. *In re Processed Egg Products Antitrust Litigation,* United States District Court for the Eastern District of Pennsylvania, Case No. 08-md-2002, **Co-lead Counsel**.

53. *In re Refrigerant Compressors Antitrust Litigation*, United States District Court for the Eastern District of Michigan, Case No. 2:09-02042.

54. *Robbins, LLC v. Cabot Corporation, et al.*, United States District Court for the District of

Massachusetts, Case No. 03-CV-11072DPW.

55. *Seven Up Bottling Company of Jasper, Inc. v. Archer Daniels Midland Co., et al.,* Circuit Court of Walker County, Alabama, Civil Action No. 95-436, **Co-lead Counsel**.

56. *In re Static Random Access Memory (SRAM) Antitrust Litigation,* United States District Court for the Northern District of California, Oakland Division, Case No. 07-cv-1819.
57. *In re TFT-LCD (Flat Panel) Antitrust Litigation,* United States District Court for the Northern District of California, San Francisco Division, Case No. 07-cv-1827.

58. *Thomas and Thomas Rodmakers, Inc., et al. v. Newport Adhesives and Composites, Inc. et al.* United States District Court Central Division, No. CV-99-07796-GHK (CTx).

Abuse of Monopoly Actions

59. *In re Hypodermic Products Antitrust Litigation,* United States District Court for the District of New Jersey, Case No. 05-cv-1602.

60. *In re Residential Telephone Lease Contract Litigation*, Southern District of Alabama, MDL 1165, **Co-lead Counsel**.

61. *Park Surgical Co. Inc., et al. v. Becton Dickinson & Company,* Civil Action No. 05 CV 5678 (E.D. Pa.)(CMR).

62. *Smith v. GTE Corp., et al.,* United States District Court for the Middle District of Alabama, Case No. 97-M-1025, **Co-lead Counsel**.

63. *Southeast Missouri Hospital, Saint Francis Medical Center v. C.R. Bard Inc.,* United States District Court for the Eastern District of Missouri, Southeastern Division, Case No. 07-cv-031, **Co-lead Counsel.**

64. *Sparks, et al. v. AT&T Corporation, et al.,* Circuit Court, Third Judicial Circuit, Madison County, Illinois, Case No. 96-LM-983.

65. *Sparks, et al. v. Lucent Technologies, et al.,* Circuit Court, Third Judicial Circuit, Madison County, Illinois, Case No. 01-L-1668.

66. *Wilson v. Toys R Us, et al.*, Circuit Court of Tuscaloosa County, Alabama, Civil Action No. CV-96-574, **Co-lead Counsel**.

Intel

67. *Dressed to Kill Custom Draperies v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3272.

68. *In re Intel Corporation Microprocessor Antitrust Litigation,* United States District Court

for the District of Delaware, C 05 485

69. *Juan v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3271.

70. *Kinder v. Intel Corp.*, United States District Court for the Northern District of California, C 05 3273.

71. *Rush v. Intel Corp.*, United States District Court for the Northern District of California C 05 3277.

Microsoft

72. *Crain v. Microsoft Corporation*, *et al*., Superior Court for the State of California, County of Yolo, No. CV 99-1740, J.C.C.P. No. 4106.

73. *Dunham v. Microsoft Corporation, et al.*, Superior Court of the State of California, County of Sonoma, No. 223291, J.C.C.P. No. 4106.

74. *Saams, et al. v. Microsoft Corporation, et al*., Superior Court for the State of California, County of San Francisco, CV 308015, J.C.C.P. No. 4106.

Securities Actions

75. *In re Alliance, Franklin/Templeton, Bank of America/Nation Funds, and Pilgrim Baxter [Franklin Templeton Subtrack] v. Sharkey Iro/Ira v. Franklin Resources, et al.,* United States District Court for the District of Maryland, Case No. 04-MD-15862.

76. *Casey v. Prudential Securities, Inc.,* Supreme Court of the State of New York, County of Albany, Index. No. 3462-97.

77. *In re Medpartners Securities Litigation*, United States District Court for the Northern District of Alabama, CV-98-B-0067-S.

78. *In re Mutual Funds Investment Litigation,* United States District Court for the District of Maryland, MDL 1586.

79. *In re NASDAQ Market-Makers Antitrust Litigation*, United States District Court for the Southern District of New York, MDL 1023.

80. *Milne v. Mercury Finance Co., et al.,* United States District Court for the Northern District of Illinois, No. 97-C-1536.

81. *Ronald Lankford v. Jos. A. Banks Clothiers, Inc.*, Circuit Court of Madison County, Alabama, Case No. CV03-204LHL.

82. *In re Vesta Insurance Group, Inc. Securities Litigation,* United States District Court for the Northern District of Alabama, CV 98-AR-1407-S, **Liaison Counsel**.

83. *Vivian Bernstein v. Janus Capital Management, LLC, et al.*, United States District Court, District of Colorado, Case No. 03-B-1798.

Products Liability Actions

84. *In re Bridgestone/Firestone, Inc. ATX, ATX II and Wilderness Tires Products Liability Litigation*, United Sates District Court for the Southern District of Indiana, Indianapolis Division, MDL 1373, (Tires).

85. *In re Cigarette Litigation,* United States District Court for the Northern District of Georgia, CV-0447 (MDL 1342).

86. *Hodge, et al. v. Eastman Chemical Company*, Circuit Court of Jefferson County, Tennessee, Civil Action No. 16.351 IV, **Co-lead Counsel**, (Photography Chemicals).

87. *Rampey v. Novartis Consumer Health, Inc.,* Circuit Court of Chambers County, Alabama, CV-97-174, **Co-lead Counsel**, (Ex-Lax).

88. *In re Zurn Pex Products Liability Litigation,* United States District Court for the District of Minnesota, Case No. 08-md-1958, **Class Counsel**.

Miscellaneous Actions

In addition to the above listed suits, Straus & Boies, LLP has been involved in numerous other fields of litigation:

89. **ALCOHOL -** Straus & Boies, LLP lead the fight against numerous alcoholic beverage manufacturers and distributors for illegally advertising to underage children. *Ayman R. Hakki, et al. v. Zima Company, et al.,* Superior Court for the District of Columbia, Case No. 1:03 CV 02621; *Randy Kreft and Colleen Kreft, et al. v. Zima Beverage Company, et al.,* District Court, City & County of Denver, Colorado, Case No. 03-CV-9229; *Ronald P. Wilson, Andrea B. Wilson and Joseph A. Wilson, et al. v. Zima Company, et al.,* Superior Court, County of Mecklenburg, State of North Carolina, Case No. 04-CV-626.

90. **GENETICALLY MODIFIED CROPS** – Straus & Boies, LLP has also been involved in litigation regarding broad contamination due to genetically modified crops. *Blades, et al. v. Monsanto Co.,* United States District Court for the Southern District of Illinois, CV 00-4034-DRH (soy); *In re Genetically Modified Rice Litigation*, United States District Court for the Eastern District of Missouri, No. 4:06-MD 1811 CDP (rice).

91. **PAN AM VICTIMS** – Straus & Boies, LLP represents family members of the victims of the terrorist act on Pan Am Flight 103. *Curtis W. Fisher, et al. v. Abdel Basset Ali Mohmed Al-Megrahi, et al.,* D.D.C. 04-02055 (HHK); *Lawrence P. Fisher II v. Great*

Socialist People's Libyan Jamahiriya, et al., D.D.C. 05-2454 (HHK).

92. *Care Pharmacies, Inc. v. Purdue Pharma, L.P., et al.,* United States District Court for the Southern District of New York, Case No. 04-CV-3890 (Class action alleging damages based on abuse of patent for OxyContin)

93. *Derek S. Lynn v. Hyundai Motor America, Inc.*, Circuit Court of Madison County, Alabama, Civil Action No. CV-03-412.

94. *In re FedEx Ground Package System, Inc. Employment Practices Litigation,* United States District Court for the Northern District of Indiana, South Bend Division, Case No. 05-MD-527.

95. *In re Humana, Inc. Managed Care Litigation,* United States District Court for the Southern District of Florida, MDL 1334, **Executive Committee**. (Class action against managed-health care organizations for nonpayment).

96. *Marleen M. LaPlant v. The Northwestern Mutual Life Insurance Company,* State of Wisconsin, Circuit Court, Milwaukee County, Case No. 08-cv-011988, **Co-lead Counsel.**

97. *Poulos, et al. v. Caesar's World, Inc., et al.,* United States District Court for the District of Nevada, CV-S-94-1126-DAE (RJJ) (Misrepresentation of odds in slot machines).

98. *Prewitt Enterprises, Inc., v. Organization of Petroleum Exporting Countries,* United States District Court for the Northern District of Alabama, Case No. CV-00-B-0865-S.

99. *Thomas Miller and Noel Collette v. Deluxe Corporation*, First Judicial District, District Court of Dakota County, Minnesota, Civil Action No. 19-CO-03-6487 (Checks Unlimited).

EXHIBIT B

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

Firm Name: STRAUS & BOIES LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY	TOTAL LODESTAR
Timothy Battin (P)			0.30		0.20			7.80			1.60				9.90	$725.00	$7,177.50
Nathan Cihlar (P)			274.10		0.90						273.30				548.30	$550.00	$301,565.00
Nathan Cihlar (P)							45.00								45.00	$350.00	$15,750.00
Shinae Kim-Helms (A)			486.80				2716.40	11.70			25.90				3240.80	$425.00	$1,377,340.00
Christopher Le (P)			4.50					38.40			0.40				43.30	$465.00	$20,134.50
Thomas Palumbo (A)			0.50								16.20				16.70	$425.00	$7,097.50
Thomas Palumbo (A)							113.90								113.90	$350.00	$39,865.00
Carla Voigt (A)			121.10		27.90		3.50								152.50	$300.00	$45,750.00
Scott Dinner (A)								10.00							10.00	$325.00	$3,250.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**887.30**	**0.00**	**29.00**	**0.00**	**2878.80**	**67.90**	**0.00**	**0.00**	**317.40**	**0.00**	**0.00**	**0.00**	**4180.40**		**$1,817,929.50**
NON-ATTORNEYS																	
Richard Noh (PL)			18.90				1230.40	5.40							1254.70	$155.00	$194,478.50
Casey Hare (PL)							0.20	1.50							1.70	$145.00	$246.50
Megan Day (PL)							4.30	1.30							5.60	$155.00	$868.00
Anna Gooding (PL)			15.80				645.60								661.40	$155.00	$102,517.00
Elizabeth Miorin (PL)			0.60				120.40								121.00	$155.00	$18,755.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**35.30**	**0.00**	**0.00**	**0.00**	**2000.90**	**8.20**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**2044.40**		**$316,865.00**
GRAND TOTAL:	**0.00**	**0.00**	**922.60**	**0.00**	**29.00**	**0.00**	**4879.70**	**76.10**	**0.00**	**0.00**	**317.40**	**0.00**	**0.00**	**0.00**	**6224.80**		**$2,134,794.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

STRAUS & BOIES, LLP

ATTORNEYS	DATE RANGE	HOURLY RATE
Timothy Battin (P)	3/1/2014 – 2/28/2017	$725
Timothy Battin (P)	6/1/2013 – 2/28/2014	$695
Nathan Cihlar (P)	3/1/2014 – 2/28/2017	$550
Nathan Cihlar (P)	6/1/2013 – 2/28/2014	$495
Nathan Cihlar (P)	N/A (doc review rate)	$350
Shinae Kim-Helms (A)	3/1/2014 – 2/28/2017	$425
Shinae Kim-Helms (A)	6/1/2013 – 2/28/2014	$385
Christopher Le (P)	1/1/2016 – 2/28/2017	$465
Christopher Le (A)	3/1/2014 – 12/31/2015	$425
Christopher Le (A)	6/1/2013 – 2/28/2014	$350
Thomas Palumbo (A)	3/1/2014 – 2/20/2015	$425
Thomas Palumbo (A)	N/A (doc review rate)	$350
Carla Voigt (A)	1/1/2016 – 2/28/2017	$300
Carla Voigt (A)	9/8/2014 – 12/31/2015	$275
Scott Dinner (A)	1/1/2016 – 2/28/2017	$325
Scott Dinner (A)	9/3/2013 – 12/31/2015	$275
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Richard Noh (PL)	3/1/2014 – 10/31/2016	$155
Richard Noh (PL)	6/1/2013 – 2/28/2014	$145
Casey Hare (PL)	7/1/2013 – 7/24/2014	$145
Megan Day (PL)	1/1/2016 – 2/28/2017	$155
Megan Day (PL)	9/30/2013 – 12/31/2015	$145
Anna Gooding (PL)	1/1/2016 – 2/28/2017	$155
Anna Gooding (PL)	10/13/2014– 12/31/2015	$145
Elizabeth Miorin (PL)	10/24/2016 – 2/28/2017	$155

EXHIBIT D

(REDACTED)

Selection Criteria

Acti.Selection	Include: WORK
Slip.Transaction Dat	6/1/2013 - 2/28/2017
Time.Selection	Include: Abdelrashid; Adams; BWright; Bacaj; Baker; Bargnesi; Battin; Boies, III; Borek; Boughman; Brant; Carter; Chapman; Chen; Christensen; Cihlar; Clark; Coakley; Cone; Crabtree; Cuevas; Curtiss; Day; Dinner; Disbursement; Feder; Ghareeb; Glover; Gooding; Hare; Harris; HarrisK; Jamison; Johnson; Khan; Kight; Kim-Helms; Lalor; Lampiasi; Le; Lee; Li; Maddalena; Maddern; Maniscalco; McFarland; Mercer; Miorin; Molony; Morris; Moser; Mundy; Nester; Noh; O'Donnell; Otto; Pal; Palumbo; Paralegal; Parker; Radcliffe; Raynes; Rodkey; Rogers; Sayah; Schirmer; Schultz; Siegel; Simpson; Siozious; Skinner; Spoerl; Stenzel; Straus; Strock; Studebaker; Swartz-Zern; Taylor; Tcihlar; Topor; Tran; Tuttle; Voigt; VonBerg; Walsh; Welsh; White; Willett; Woodbury; Wright; office mgr
Clie.Selection	Include: 244/Ion Batteries; 244/Ion Batteries(1); 244/Ion Batteries(2); 244/Ion Batteries(3); 244/Ion Batteries(4); 244/Ion Batteries(5); 244/Ion Batteries(6); 244/Ion Batteries(7); 244/Ion Batteries(8); 244/Ion Batteries(9); 244/Ion Battery (10); 244/Ion Battery (11); 244/Ion Battery (12); 244/Ion Battery (13); 244/Ion Battery(14)

Nickname 244/Ion Batteries(3) | Draft disc answ
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Activity: WORK					
6/28/2013 191300	Christopher Le WORK	350.00	0.50	175.00	Billable
	Reviewed email from J. Verducci regarding amended complaint and strategy [redacted] (0.20); reviewed stipulated protected order and its Exhibit A [redacted] (0.20); emailed local counsel regarding the same (0.10).				
7/1/2013 191302	Christopher Le WORK	350.00	1.00	350.00	Billable
	Reviewed email and documents from Bill Straus [redacted] (0.30); emailed E. Pickar, J. Wyatt, M. Muecke and other regarding [redacted] before filing the amended complaint (0.50); teleconference with Jaclyn Verducci and numerous emails exchanged coordinating the same (0.20).				
7/1/2013 191585	Richard Noh WORK	145.00	0.20	29.00	Billable
	Assist C. Le with [redacted]				
7/2/2013 191792	Christopher Le WORK	350.00	0.70	245.00	Billable
	Email exchange with W. Straus regarding [redacted] (0.20); email exchange with M. Muecke regarding [redacted] (0.20); reviewed materials in connection to the same and updated tracking chart [redacted] (0.30).				
7/5/2013 191952	Richard Noh WORK	145.00	0.20	29.00	Billable
	Assist C. Le with [redacted]				
7/9/2013 191803	Christopher Le WORK	350.00	0.20	70.00	Billable
	Email exchange with Jaclyn Verducci regarding [redacted]				
7/10/2013 191806	Christopher Le WORK	350.00	0.20	70.00	Billable
	Reviewed email from D. Birkhaeuser regarding [redacted]				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/27/2013 193236	Thomas M. Palumbo WORK Conferences with C. Le regarding [redacted] (0.10); research and analyze materials regarding [redacted] (0.20); email correspondence with L. Heath regarding same (0.20).	425.00	0.50	212.50	Billable
2/16/2014 195657	Timothy D. Battin WORK Exchange emails with L. Chan regarding demand letters in Massachusetts and claims under Massachusetts law; exchange emails with C. Le regarding same (0.10); analysis regarding demand letters and related issues (0.20).	695.00	0.30	208.50	Billable
2/17/2014 195654	Christopher Le WORK Collected and emailed demand letter materials to L. Chan per lead counsels request (0.10); email exchange with T. Battin regarding the same (0.10).	350.00	0.20	70.00	Billable
9/2/2014 215576	Nathan Cihlar WORK Review informal and certified translations completed to date (1.50); meetings with R. Noh and T. Palumbo regarding drafting tracking chart related to same (0.20); emails with R. Spiegel regarding same (0.20); meetings with T. Palumbo regarding issues with foldering on Catalyst (0.30).	550.00	1.80	990.00	Billable
9/26/2014 199746	Christopher Le WORK Email exchanges with co-counsel for [redacted] requested by lead counsel.	425.00	0.30	127.50	Billable
9/29/2014 199747	Christopher Le WORK Reviewed emails form W. Straus, M. Reich, and L. Garcia [redacted] requested by lead counsel.	425.00	0.40	170.00	Billable
9/30/2014 199744	Christopher Le WORK Emailed M. Muecke regarding class representative responses (0.10); reviewed [redacted] (0.10); teleconference with L. Lynch regarding [redacted] (0.20); reviewed emails to lead counsel regarding the same (0.10).	425.00	0.50	212.50	Billable
10/9/2014 200194	Christopher Le WORK Teleconference with M. Muecke regarding class representative discovery responses (0.30); Reviewed email from [redacted] (0.20).	425.00	0.50	212.50	Billable
11/5/2014 201589	Nathan Cihlar WORK Update translation tracking chart (0.20); email same to R. Spiegel (0.10).	550.00	0.30	165.00	Billable
1/12/2015 202086	Nathan Cihlar WORK Emails with D. Lambrinos regarding translation assignments for Toshiba documents (0.20); review documents for translation and assign to foreign review team (0.30).	550.00	0.50	275.00	Billable
1/30/2015 201900	Nathan Cihlar WORK Update/edit translation tracking chart (0.30); meetings with R. Noh and S. Kim-Helms regarding same (0.20); emails with R. Spiegel regarding translation issues, tracking chart (0.20); review/analysis of finalized translations (0.70); emails with foreign review team regarding proposed edits to the same (0.10).	550.00	1.50	825.00	Billable
2/3/2015 202209	Nathan Cihlar WORK Emails with R. Spiegel regarding hot document list with proposed documents for certified translation (0.20); analysis/review of documents proposed for translation (0.60); teleconference with S. Kim-Helms regarding potential duplicates related to the same (0.20).	550.00	1.00	550.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/23/2015 215579	Nathan Cihlar WORK Update/edit translation tracking chart (0.20); meetings with R. Noh regarding same (0.10).	550.00	0.30	165.00	Billable
4/6/2015 203100	Nathan Cihlar WORK Review and analyze whether suggested revisions of cert translations are consistent (0.60); emails with S. Kim-Helms regarding same (0.20); emails with DPPs regarding edits/finalization of the certified translations (0.40).	550.00	1.20	660.00	Billable
4/9/2015 203104	Nathan Cihlar WORK Email correspondence with D. Lambrinos regarding management of document review completion of translations (0.20); analyze status of requested translations to ensure consistency (0.30); emails with R. Noh regarding same (0.10).	550.00	0.60	330.00	Billable
4/22/2015 203141	Nathan Cihlar WORK Emails with E. Levens [redacted]	550.00	0.30	165.00	Billable
4/23/2015 203050	Carla Voigt WORK Conduct research regarding [redacted] and identify co-counsel and contact information for same (0.60); conferences with N. Cihlar regarding same (0.40); email exchanges and teleconferences with E. Levens and co-counsel D. Birkhaeuser, M. Muecke, W. Straus, and J. Wyatt regarding scheduling calls [redacted] (3.50).	275.00	4.50	1,237.50	Billable
4/23/2015 203144	Nathan Cihlar WORK Emails with E. Levens regarding class representative interrogatory responses (0.40); teleconference with various class rep. co-counsel re: drafting responses to the same and coordination with co-counsel on calls (1.00); meetings with C. Voigt regarding same (0.30); review [redacted] related to the same (0.80).	550.00	2.50	1,375.00	Billable
4/24/2015 203053	Carla Voigt WORK Email exchanges and teleconferences with co-counsel to coordinate [redacted] (0.20); email exchange with E. Levens [redacted] (0.60); locate materials for [redacted] and prepare file folders in preparation for conference calls [redacted] (3.20).	275.00	4.00	1,100.00	Billable
4/24/2015 203148	Nathan Cihlar WORK [redacted] (0.80); [redacted] (0.50).	550.00	1.30	715.00	Billable
4/27/2015 203055	Carla Voigt WORK Email exchanges and teleconferences with local counsel regarding coordinating [redacted] with [redacted] (1.20); [redacted] (1.50); [redacted] (0.30); [redacted] (3.00).	275.00	6.00	1,650.00	Billable
4/27/2015 203152	Nathan Cihlar WORK Teleconference with J. Wyatt [redacted] regarding interrogatory/ requests (0.90); [redacted] (0.70); [redacted] (0.70).	550.00	2.30	1,265.00	Billable
4/28/2015 203058	Carla Voigt WORK Prepare for and participate in conference call [redacted] (2.00); [redacted] (0.50); [redacted]	275.00	7.00	1,925.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] (0.20); route memorandum to N. Cihlar and J. Wyatt for review [redacted] (4.00); email exchanges with M. Muecke [redacted] (0.30).				
4/28/2015 203157	Nathan Cihlar WORK Teleconferences with [redacted] (0.80); [redacted] (0.60); [redacted] (1.00).	550.00	2.40	1,320.00	Billable
4/29/2015 203060	Carla Voigt WORK Email exchanges with D. Birkhaeuser regarding [redacted] (0.50); prepare for and participate in conference call [redacted] (3.00); email exchanges [redacted] (0.70); email exchange with [redacted] (0.50)	275.00	4.70	1,292.50	Billable
4/29/2015 203159	Nathan Cihlar WORK Meetings with C. Voigt regarding preparations and updates [redacted] (0.40); [redacted] (0.60); [redacted] (0.70).	550.00	1.70	935.00	Billable
4/30/2015 203063	Carla Voigt WORK [redacted] (0.40); email exchanges with D. Birkhaeuser in preparation for conference call (0.20); [redacted] (0.40); [redacted] (3.10); [redacted] (0.40).	275.00	4.50	1,237.50	Billable
4/30/2015 203163	Nathan Cihlar WORK Meetings with C. Voigt regarding preparations and updates [redacted] (0.40); [redacted] (0.60); review ascertainability issues [redacted] co-counsel (0.50); [redacted] (0.50); [redacted] (0.60).	550.00	2.60	1,430.00	Billable
4/30/2015 215585	Shinae Kim-Helms WORK [redacted] (0.90); e-mails with N. Cihlar regarding same (0.20); review revisions to SDI translations prepared by J. Choi (3.00); e-mails with J. Choi regarding translation of disputed Korean terms (0.50).	425.00	4.60	1,955.00	Billable
5/1/2015 203067	Carla Voigt WORK Email exchanges and teleconferences with co-counsel [redacted] (0.40); [redacted] (0.30); [redacted] (1.50).	275.00	2.20	605.00	Billable
5/1/2015 203167	Nathan Cihlar WORK Emails with D. Lambrinos regarding ascertainability issues [redacted] (0.30); [redacted] (0.70); [redacted] (0.50).	550.00	1.50	825.00	Billable
5/4/2015 203072	Carla Voigt WORK Email exchanges and teleconferences with local counsel regarding coordinating class rep calls with lead counsel regarding discovery responses (0.30); review and analyze notes from conference calls with various class representatives and draft memorandums regarding same (3.70); email exchanges with local counsel and D. Young regarding additional materials produced by class reps (0.50).	275.00	4.50	1,237.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/5/2015 203409	Carla Voigt WORK	275.00	2.00	550.00	Billable
	Prepare for and participate in conference call [redacted] (1.00); [redacted] (0.50); [redacted] (0.50).				
5/5/2015 215581	Nathan Cihlar WORK	550.00	1.10	605.00	Billable
	[redacted] as it relates to production and ascertainability issues (0.40); correspondence with R. Spiegel and D. Lambrinos regarding the same (0.20); review materials and Catalyst for documents pertaining [redacted] (0.40); emails with D. Lambrinos regarding [redacted] (0.10).				
5/6/2015 203413	Carla Voigt WORK	275.00	1.50	412.50	Billable
	Email exchanges with [redacted] (0.80); email exchanges with D. Young and A. Gutierrez regarding same (0.70).				
5/6/2015 203585	Nathan Cihlar WORK	550.00	0.80	440.00	Billable
	Review and analysis of SDI interrogatory responses to identify documents yet to be translated (0.30); coordinate with DPPs, V. Glaze, on informals of the same (0.20); emails with R. Spiegel and S. Kim-Helms regarding informal translations of remaining documents identified (0.30).				
5/7/2015 203417	Carla Voigt WORK	275.00	1.00	275.00	Billable
	[redacted]				
5/8/2015 203421	Carla Voigt WORK	275.00	0.50	137.50	Billable
	[redacted] email exchange with D. Young regarding same.				
5/8/2015 203591	Nathan Cihlar WORK	550.00	1.00	550.00	Billable
	Meetings with C. Voigt regarding [redacted] (0.40); review and analysis of various class representative information, purchase history (0.30); review emails from D. Young regarding information [redacted] (0.30).				
5/11/2015 203425	Carla Voigt WORK	275.00	3.00	825.00	Billable
	Email exchanges with local counsel regarding [redacted] route documents and information to D. Young and A. Gutierrez (1.70); route draft discovery responses to various local counsel (0.50); teleconferences with D. Lambrinos and D. Birkhaeuser regarding [redacted] (0.80).				
5/12/2015 203429	Carla Voigt WORK	275.00	1.00	275.00	Billable
	Email exchanges with local counsel regarding [redacted] (0.80); [redacted] (0.20).				
5/13/2015 203431	Carla Voigt WORK	275.00	1.50	412.50	Billable
	Email exchanges with various [redacted] email exchanges with D. Young and A. Gutierrez regarding same (1.20); route draft [redacted] (0.30).				
5/14/2015 203434	Carla Voigt WORK	275.00	0.50	137.50	Billable
	Email exchanges with [redacted]				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/19/2015 203443	Carla Voigt WORK	275.00	0.40	110.00	Billable
	Email exchanges with [redacted] (0.30); [redacted] (0.10).				
5/21/2015 203449	Carla Voigt WORK	275.00	0.30	82.50	Billable
	[redacted]				
6/1/2015 203771	Nathan Cihlar WORK	550.00	3.80	2,090.00	Billable
	Review and analysis of proposed documents for translation from D. Lambrinos (1.50); emails with D. Lambrinos regarding the same (0.50); teleconference with S. Kim-Helms regarding issues related to the documents requested for translation and review of informal translations of the same (0.80); teleconference with J. Moy of DPPs regarding requests for certified translations (1.00).				
6/2/2015 204286	Nathan Cihlar WORK	550.00	3.40	1,870.00	Billable
	Emails with R. Spiegel regarding proposed documents for translation from D. Lambrinos (0.70); review/cross-check documents and discuss same with DPPs (1.00); meetings with R. Noh regarding circulation of documents for certified translation to Consortra (0.20); emails with DPPs regarding status of informal translations of transactional data, certified translations, division of assignments (0.50); review next wave planning and status worksheet from R. Spiegel (0.50); teleconference with S. Kim-Helms and R. Spiegel regarding the same (0.50).				
6/5/2015 204294	Nathan Cihlar WORK	550.00	3.00	1,650.00	Billable
	Emails with V. Glaze. A. Sheanin, R. Spiegel and others regarding translations of documents for Kwak personnel files to attach to notice of deposition (0.90); review and legal analysis of suggested docs for certification (0.80); teleconference with S. Kim-Helms regarding same (0.20); review expense report requested informal translations (0.60); emails with S. Kim-Helms regarding search methods for locating additional expense reports (0.50).				
6/8/2015 204159	Carla Voigt WORK	275.00	0.50	137.50	Billable
	[redacted]				
6/8/2015 204297	Nathan Cihlar WORK	550.00	2.60	1,430.00	Billable
	Emails with D. Lambrinos regarding requests for translation related to various deponents and strategy analysis of same (0.40); teleconference with S. Kim-Helms regarding same (0.20); cross check translation requests (0.90); meetings with R. Noh regarding certified translation requests with Consortra (0.30); teleconference with DPPS regarding documents proposed for certified translation (0.80).				
6/10/2015 204167	Carla Voigt WORK	275.00	0.30	82.50	Billable
	[redacted]				
6/16/2015 204178	Carla Voigt WORK	275.00	0.20	55.00	Billable
	[redacted]				
6/16/2015 204338	Nathan Cihlar WORK	550.00	1.50	825.00	Billable
	Review and revisions to documents for translation in preparation for response to Toshiba SJM (0.70); teleconference with R. Spiegel regarding same (0.40); emails with direct purchasers regarding coordination regarding translations (0.40).				
7/9/2015 215422	Shinae Kim-Helms WORK	425.00	0.90	382.50	Billable
	E-mail to R. Noh with to-do-list in preparation for objections to Defendants translations contained in said Toshibas Summary Judgment Motion (0.40); teleconference with R. Noh regarding same (0.50).				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/9/2015 215461	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding foreign language exhibits used in Declarations in support of Toshiba's Summary Judgement Motion and strategy/procedures for objecting to the same (0.60).	550.00	0.60	330.00	Billable
7/10/2015 215423	Shinae Kim-Helms WORK E- mails with R. Noh regarding status of preparing translation objection package to circulate to DPPs and IPPs (0.40).	425.00	0.40	170.00	Billable
7/13/2015 215424	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding status of translation objection preparation package (0.60); teleconference with R. Noh regarding same (0.50); review list of foreign language exhibits and certified translations thereof contained in Declarations filed in support of Toshibas Summary Judgment Motion, prepared by R. Noh (1.20); revise said list (0.70); propose division of work by DPPs and IPPs (0.40); e-mail same to N. Cihlar (0.40).	425.00	3.80	1,615.00	Billable
7/13/2015 215458	Nathan Cihlar WORK Teleconference with R. Spiegel and DPPs, V. Glaze and J. Moy, regarding coordination and designing protocol on drafting objections to translations (1.00).	550.00	1.00	550.00	Billable
7/14/2015 215425	Shinae Kim-Helms WORK E-mail to R. Spiegel and N. Cihlar regarding handling translation objections to translations (0.80); draft e-mail to foreign language reviewers with detailed instructions to prepare objections to translations of exhibits contained in Declarations filed in support of Toshibas Summary Judgment Motion (1.20).	425.00	2.00	850.00	Billable
7/15/2015 205891	Nathan Cihlar WORK Meetings with R. Noh regarding structure for objection tracking chart and procedures for coordination with DPPs (0.30); emails with S. Kim-Helms regarding same (0.20).	550.00	0.50	275.00	Billable
7/15/2015 215426	Shinae Kim-Helms WORK E-mails with R. Noh and N. Cihlar regarding translation objection chart (0.40); e-mails with J. Choi and S. Nagano regarding preparing objections to translations provided by Defendants in Toshiba's Summary Judgment Motion (0.60); e-mails with R. Spiegel regarding translation objection assignments (0.40).	425.00	1.40	595.00	Billable
7/17/2015 215427	Shinae Kim-Helms WORK E-mails with S. Nagano regarding strategy for translation objection assignments.	425.00	0.40	170.00	Billable
7/20/2015 215428	Shinae Kim-Helms WORK E-mails with S. Nagano regarding strategy for translation objection assignments.	425.00	0.40	170.00	Billable
7/24/2015 215429	Shinae Kim-Helms WORK E-mails with S. Nagano regarding strategy for status of translation objections.	425.00	0.40	170.00	Billable
7/30/2015 215459	Nathan Cihlar WORK Emails with D. Lambrinos regarding procedures for leading foreign review team regarding translations, requests for same and objection to translation process.	550.00	0.50	275.00	Billable
8/4/2015 215430	Shinae Kim-Helms WORK E-mails with J. Choi regarding preparing objections to Defendants translations of exhibits attached to Toshibas Motion for Summary Judgment Declarations.	425.00	0.30	127.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/10/2015 206497	Nathan Cihlar WORK Review and analyze proposed objections to translations in Toshiba's SJM by various DPP and IPP team members (2.00); strategize and formulate position for draft joint response to the same (1.50); teleconferences with S.Kim-Helms regarding the same (0.50).	550.00	4.00	2,200.00	Billable
8/10/2015 215431	Shinae Kim-Helms WORK Review and revise objections to translations of documents attached Toshibas Summary Judgment Motion, prepared by J. Choi (2.50); review and compile objections to translations prepared by DPPs (1.90).	425.00	4.40	1,870.00	Billable
8/11/2015 215432	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding combined objections to Toshibas translations (0.40).	425.00	0.40	170.00	Billable
8/12/2015 215433	Shinae Kim-Helms WORK E-mails with M. Pilotin regarding time frame in preparing certified translations and objections to Toshibas translations (0.40); receive and review DPPs selections of objections to Toshibas translations (1.20); e-mails with N. Cihlar regarding same (0.40); review and analyze each objection and strategy for each (0.80).	425.00	2.80	1,190.00	Billable
8/13/2015 215408	Nathan Cihlar WORK Review and analysis of proposed objections to Toshiba's SJM (1.00); teleconference with S. Kim-Helms regarding leading foreign team response to same and coordination with DPPs (0.40).	550.00	1.40	770.00	Billable
8/13/2015 215434	Shinae Kim-Helms WORK E-mails with H. Rim regarding translation objection and serving as check interpreter at depositions.	425.00	0.40	170.00	Billable
8/14/2015 206499	Nathan Cihlar WORK Finalize strategy for joint objections to translations found in Toshiba's SJM (1.60); review emails from DPPs regarding coordination and proposed suggestions to the same (0.40).	550.00	2.00	1,100.00	Billable
8/14/2015 215417	Richard Noh WORK Assist S. Kim-Helms with formatting for translation objection.	145.00	1.00	145.00	Billable
8/14/2015 215435	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding each translation objection proposed by DPPs and IPPs and finalize objections to serve to Defendants (0.50); teleconference with R. Noh regarding formatting of Plaintiffs translation objections (0.50); e-mails with S. Nagano regarding objections raised to Toshibas Translations (0.40); follow-up teleconference with S. Nagano to clarify said issues (0.70); revise and finalize objections to Toshibas translations (1.20).	425.00	3.30	1,402.50	Billable
8/17/2015 206500	Nathan Cihlar WORK Prepare correspondence to co-lead counsel outlining management of translation objection process, status and final strategy for draft joint response to translations in Toshiba's SJM.	550.00	1.20	660.00	Billable
8/19/2015 215436	Shinae Kim-Helms WORK Receive email by M. Pilotin regarding suggested revisions to IPPs objections to Toshibas translations (0.40); receive and review DPPs selections of objections to Defendants translations (0.10); e-mails with C. Smith regarding same (0.40); e-mails with S. Nagano regarding IPPs objections to translation served by Toshiba (0.40); combine IPPs and DPPs objections to Toshibas translations (0.10); prepare final version of joint Plaintiffs objections to Toshibas translations (0.50).	425.00	1.90	807.50	Billable
8/20/2015 206501	Nathan Cihlar WORK Finalize proposed list of objections to serve on defendants related to the Toshiba SJM (1.20); coordinate with DPPs regarding strategy for the same (0.40); analysis for IPPs of potential objections and arguments/rationale for the same (0.80); emails with DPPs regarding latest proposal	550.00	3.00	1,650.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	of objection response (0.60).				
8/20/2015 215437	Shinae Kim-Helms WORK E-mails with V. Glaze and J. Moy regarding revising current set of objections to Toshibas translations (1.00).	425.00	1.00	425.00	Billable
8/21/2015 206502	Nathan Cihlar WORK Teleconference with DPPs including V. Glaze, C. Smith, and with S. Kim-Helms regarding strategy for objections to translations from Toshiba SJM (0.30); final formulation of responses to send to defendants (0.20).	550.00	0.50	275.00	Billable
8/21/2015 215438	Shinae Kim-Helms WORK Teleconference with V. Glaze, J. Moy, A. Kikuchi and C. Smith, K. Yamada, and N. Cihlar to finalize Joint Plaintiffs objections to Toshibas translations (0.50); teleconference with N. Cihlar regarding same (0.50); review and revise translation objection chart (0.50); incorporate N. Cihlars suggestions to final translation objection chart (0.40); circulate same to DPPs (0.20).	425.00	2.10	892.50	Billable
8/24/2015 215400	Anna Gooding WORK Reformat excel chart of translation objections per request of S. Kim-Helms.	145.00	3.00	435.00	Billable
8/24/2015 215439	Shinae Kim-Helms WORK Teleconference with A. Gooding to revise Joint Plaintiffs objections to Toshibas translations (0.50); review and finalize Plaintiffs' objections to Toshibas translation (1.20); circulate same to IPPs and DPPs counsel (0.20).	425.00	1.90	807.50	Billable
8/26/2015 215440	Shinae Kim-Helms WORK Revise and finalize Joint Plaintiff's Objection to Toshibas Translations (0.50); e-mails with V. Glaze and N. Cihlar regarding same (0.40); e-mails with A. Gooding regarding excel spreadsheets to be re-formatted to be entered at Toshiba depositions (0.40).	425.00	1.30	552.50	Billable
8/26/2015 215460	Nathan Cihlar WORK Emails with DPP attorney V. Glaze regarding coordination issues related to service of objections to translations on Defendants.	550.00	0.30	165.00	Billable
9/14/2015 206556	Carla Voigt WORK [redacted] (0.30); [redacted] (0.80).	275.00	1.10	302.50	Billable
9/15/2015 206557	Carla Voigt WORK [redacted] (0.40); [redacted] (0.80).	275.00	1.20	330.00	Billable
9/16/2015 206558	Carla Voigt WORK [redacted] (0.30); [redacted] (0.30); [redacted] (0.40).	275.00	1.00	275.00	Billable
9/17/2015 206559	Carla Voigt WORK [redacted] (0.80); [redacted] (0.20).	275.00	1.00	275.00	Billable
9/18/2015 206560	Carla Voigt WORK [redacted] (0.30); [redacted]	275.00	1.50	412.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] (0.80); [redacted] (0.40).				
9/21/2015 206561	Carla Voigt WORK [redacted] (0.80); [redacted] (0.40).	275.00	1.20	330.00	Billable
9/21/2015 206576	Nathan Cihlar WORK Review and analysis of responses to Plaintiffs' objections to translations found in Toshiba's SJM in order to formulate responses (0.70); review emails from Defendant attorney A. Kabori regarding the same (0.10); emails with S. Kim-Helms regarding strategy for reply (0.20); emails with DPPs regarding coordination and proposed suggestions to the same (0.20).	550.00	1.20	660.00	Billable
9/21/2015 215441	Shinae Kim-Helms WORK Receive and review Defendants responses to Plaintiffs translation objections to Toshibas Summary Judgment Motion (0.50); prepare brief analysis and send to N. Cihlar (0.50).	425.00	1.00	425.00	Billable
9/22/2015 206562	Carla Voigt WORK [redacted] (0.20); [redacted] (0.10).	275.00	0.30	82.50	Billable
9/22/2015 206577	Nathan Cihlar WORK E-mails with DPPs regarding coordination and proposed strategy for reply to translation objection responses related to documents in Toshiba's SJM.	550.00	0.60	330.00	Billable
9/22/2015 215442	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding plan to prepare joint Plaintiffs responses to Defendants responses to translation objections (0.40); draft e-mail regarding same per N. Cihlar (0.80); e-mails with R. Noh regarding format of re-certified translations (0.40).	425.00	1.60	680.00	Billable
9/23/2015 206578	Nathan Cihlar WORK Review translation protocol for procedures for recertification of documents with finalized objections to translations (0.30); emails with V. Glaze of DPPs and S. Kim-Helms regarding the same (0.10).	550.00	0.40	220.00	Billable
9/23/2015 215443	Shinae Kim-Helms WORK Review DPPs notes on Defendants responses to Plaintiffs translation objections (1.20); e-mails with V. Glaze and N. Cihlar regarding certified translations ready for recertification (0.40).	425.00	1.60	680.00	Billable
9/24/2015 215444	Shinae Kim-Helms WORK Analyze Defendants responses to Plaintiffs objections to Toshibas translations.	425.00	1.20	510.00	Billable
9/25/2015 206563	Carla Voigt WORK [redacted] (0.30); [redacted] (1.30); [redacted] (0.10).	275.00	1.70	467.50	Billable
9/25/2015 215445	Shinae Kim-Helms WORK Continue to analyze Defendants responses to Plaintiffs objections to Toshibas translations (2.20); prepare draft responses to said Defendants translation objection responses (1.20).	425.00	3.40	1,445.00	Billable
9/28/2015 215446	Shinae Kim-Helms WORK Receive and review draft responses to Defendants translation objection responses prepared by S. Nagano (1.20); continue to analyze Defendants responses to Plaintiffs objections to Toshibas	425.00	2.40	1,020.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translations (1.20).				
9/29/2015 206579	Nathan Cihlar WORK Analysis and review of literal interpretations of remaining translation wording as provided by our foreign translation team and formulate strategy for reply (0.60); draft propose replies to remaining translation objections re: Toshiba SJM (0.40).	550.00	1.00	550.00	Billable
9/29/2015 215447	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding responses to Defendants responses to Plaintiffs translation objections (0.40); prepare draft responses and supporting allegations to Defendants responses to Plaintiffs translation objections (1.20).	425.00	1.60	680.00	Billable
9/30/2015 206580	Nathan Cihlar WORK Finalize our position for replies to responses to our objections related to the Toshiba SJM (1.00); teleconference with S. Kim-Helms regarding the same (0.20); circulate same to DPPs (0.10); emails with V. Glaze regarding opinions related to various translation objection issues and wording (0.20).	550.00	1.50	825.00	Billable
9/30/2015 215448	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding draft responses and supporting allegations to Defendants responses to Plaintiffs translation objections (0.40); teleconference with N. Cihlar regarding same (0.50); review revised draft responses and supporting allegations to Defendants responses to Plaintiffs translation objections and provide comments on same (0.50).	425.00	1.40	595.00	Billable
10/1/2015 207046	Nathan Cihlar WORK Analysis of Defendants responses to our objections to translations stemming from Toshiba SJM; draft/edit position related to the same (1.00); teleconference with V. Glaze and DPPs regarding coordinated response to the same (0.30); analysis of documents to finalized for recertification following meet and confers and resolution of objections (0.50); meetings with S. Kim-Helms regarding same (0.20); emails to S. Scarlett, D. Lambrinos and M. Pilotin regarding proposed final reply to outstanding translation objections (0.50).	550.00	2.50	1,375.00	Billable
10/1/2015 215449	Shinae Kim-Helms WORK Prepare summary of number of documents with outstanding translation objections and documents ready to be recertified (0.60); forward said summary to N. Cihlar (0.10); teleconference with DPPs counsel and N. Cihlar to discuss proposed Joint Plaintiffs responses and supporting allegations to Defendants responses to Plaintiffs translation objections (0.50); e-mails with S. Nagano regarding dictionary citation as basis of translation objection (0.40).	425.00	1.60	680.00	Billable
10/5/2015 207043	Nathan Cihlar WORK Emails with V. Glaze regarding finalization and coordination for circulation to Defendants of our Replies to outstanding objections to translations from Toshiba SJM (0.10); review final version to ensure for accuracy and to ensure our position is maintained (0.20).	550.00	0.30	165.00	Billable
10/5/2015 215450	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding translation objections, case updates and other related issues.	425.00	0.50	212.50	Billable
10/21/2015 207182	Nathan Cihlar WORK Receive and review Defendants second response to translation objections from documents used in Toshiba SJM and manage assignments related to same(0.30); teleconference with S. Kim-Helms regarding same (0.10); review new recertified translations by Defendants for accuracy regarding our position (0.20); coordinate drafting our response with DPPs (0.10).	550.00	0.70	385.00	Billable
10/21/2015 215451	Shinae Kim-Helms WORK Review Defendants second responses to Plaintiffs translation objections to Toshiba SJM served by A. Kobori (0.30); e-mails with N. Cihlar regarding same (0.30).	425.00	0.60	255.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/22/2015 207185	Nathan Cihlar WORK Emails with DPP attorney V. Glaze regarding strategy and coordination on our reply to Defendants 2nd response to objections to translations related to Toshiba's SJM (0.30).	550.00	0.30	165.00	Billable
10/27/2015 207287	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding preparing responses to Defendants second responses to Plaintiffs translation objections to Toshiba SJM (0.20); review said Defendants second responses (0.30).	425.00	0.50	212.50	Billable
10/28/2015 207196	Nathan Cihlar WORK Review and analysis of 2nd response to translation objections from Toshiba SJM (0.30); review email from Defendant attorney A. Kobori regarding objections to translations from Fujitomo and Eguchi depositions (0.10); emails to lead counsel, S. Scarlett, D. Lambrinos regarding the same (0.20); analysis of additional objections (0.20); teleconference with S. Kim-Helms regarding strategy for formulating response to latest translation objections (0.20).	550.00	1.00	550.00	Billable
10/28/2015 207290	Shinae Kim-Helms WORK Prepare draft responses preparing responses to Defendants second responses to Plaintiffs translation objections to Toshiba SJM (1.00); review and analyze documents and translations referenced in said Defendants second responses(1.00); e-mails with S. Nagano regarding translation to be proposed to Defendants(0.20); receive and review Defendants objections to Plaintiffs translations of Fujitomo and Eguchi exhibits(1.00).	425.00	3.20	1,360.00	Billable
10/29/2015 207200	Nathan Cihlar WORK Analysis of Toshiba translation objection responses and strategize arguments for our reply (0.90); draft/edit 2nd Responses to Translation Objections related to translations from Toshiba SJM (1.30).	550.00	2.20	1,210.00	Billable
10/30/2015 207202	Nathan Cihlar WORK Finalize draft of 2nd responses to translations from Toshiba SJM (0.40); coordination with V. Glaze of DPPs regarding finalization of the same (0.20); draft email outlining strategy and coordination on responses to translation objections from Eguchi and Fujitomo to V. Glaze (0.20).	550.00	0.80	440.00	Billable
10/30/2015 207293	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding draft Plaintiffs responses to Defendants second responses to Plaintiffs translation objections to Toshiba SJM (0.20); review revised and updated draft Plaintiffs responses(1.20); e-mails with N. Cihlar regarding same(0.20); e-mails with N. Cihlar regarding recertified translations prepared by Defendants(0.20); teleconference with R. Noh to check potential errors in said recertified translations prepared by Defendants(0.20); e-mail to S. Nagano to prepare draft responses and analysis to Defendants objections to Fujitomo and Eguchi depositions(0.20).	425.00	2.20	935.00	Billable
11/2/2015 207296	Shinae Kim-Helms WORK Teleconference with S. Nagano regarding preparing Plaintiffs responses to Defendants objections to Fujitomo and Eguchi deposition translations (0.50); e-mails with S. Scarlett, C. Lovell and R. Noh to obtain stamped versions of exhibits (0.50).	425.00	1.00	425.00	Billable
11/3/2015 207723	Nathan Cihlar WORK Emails with V. Glaze DPP counsel and S. Kim-Helms regarding coordination for translations (0.30); conference call with V. Glaze regarding coordination on certified translations issues/ approach to DAP translations (0.40).	550.00	0.70	385.00	Billable
11/5/2015 207653	Carla Voigt WORK [redacted] (0.20); [redacted] (0.50); [redacted] (0.30).	275.00	1.00	275.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/9/2015 215452	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of draft responses to Defendants translation objections to Fujitomo and Eguchi exhibits and updates on deposition schedules (0.40).	425.00	0.40	170.00	Billable
11/11/2015 207588	Shinae Kim-Helms WORK Review draft responses to Defendants translation objections to Eguchi and Fujitomo exhibits, prepared by S. Nagano and DPPs (1.50); e-mails with R. Noh regarding stamped copies of exhibits (0.40); combine said draft responses with responses (0.40); analyze each objection along with foreign original document and translation entered into exhibit(0.40); revise draft responses to said objections (0.40).	425.00	3.10	1,317.50	Billable
11/11/2015 207664	Carla Voigt WORK Email exchanges with [redacted] (0.10); review [redacted] (0.10).	275.00	0.20	55.00	Billable
11/12/2015 207590	Shinae Kim-Helms WORK Continue to review draft responses to Defendants translation objections to Eguchi and Fujitomo exhibits, prepared by S. Nagano and DPPs (0.40); analyze each objection along with foreign original document and translation entered into exhibit (0.40); revise draft responses to said objections (0.40); prepare reasoning (0.40); e-mails with S. Nagano regarding different translation options for Japanese documents (0.40).	425.00	2.00	850.00	Billable
11/12/2015 207668	Carla Voigt WORK [redacted] (0.10); email exchanges regarding same (0.10).	275.00	0.20	55.00	Billable
11/13/2015 207592	Shinae Kim-Helms WORK Continue to review draft responses to Defendants translation objections to Eguchi and Fujitomo exhibits, prepared by S. Nagano and DPPs (0.30); analyze each objection along with foreign original document and translation entered into exhibit (0.60); revise draft responses to said objections (0.30); prepare reasoning (0.30); e-mails with S. Nagano regarding different translation options for Japanese documents (0.20).	425.00	1.70	722.50	Billable
11/13/2015 207670	Carla Voigt WORK [redacted] (0.10); [redacted] (0.10).	275.00	0.20	55.00	Billable
11/13/2015 207724	Nathan Cihlar WORK Conference with S. Kim-Helms regarding strategy and formulation of position for proposed responses to translation objections for documents entered in the Fujitomo and Eguchi depositions (0.50); conduct analysis regarding same and begin drafting proposed responses (1.80).	550.00	2.30	1,265.00	Billable
11/16/2015 207594	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding draft responses to Defendants translation objections to Eguchi and Fujitomo exhibits (0.30); review and revise same (0.70).	425.00	1.00	425.00	Billable
11/16/2015 207673	Carla Voigt WORK Analyze notes from S. Kim-Helms and DPP foreign reviewers regarding proposed responses to translation objections for documents entered in the Fujitomo and Eguchi depositions (0.80); conference with N. Cihlar regarding common issues arising in same and strategy for responses; edit proposed responses accordingly (0.30).	275.00	1.10	302.50	Billable
11/16/2015 207725	Nathan Cihlar WORK Analysis of proposed literal responses to objections for Fujitomo and Eguchi translations and formulate strategy to ensure protection of legal positioning (1.50); draft proposed responses (1.80); teleconference with S. Kim-Helms regarding same (0.30).	550.00	3.60	1,980.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/17/2015 207596	Shinae Kim-Helms WORK E-mails with S. Nagano to obtain opinion on accurate translation of Japanese documents related to translation objections.	425.00	0.30	127.50	Billable
11/17/2015 207678	Carla Voigt WORK Conferences with N. Cihlar regarding edits to proposed responses to translation objections for documents entered in the Fujitomo and Eguchi depositions (0.50); implement N. Cihlar's edits to same (0.50); teleconferences with S. Kim-Helms and S. Nagano regarding specific documents and objections (0.30).	275.00	1.30	357.50	Billable
11/17/2015 207726	Nathan Cihlar WORK Analysis and formulation of final proposed response to various translation objections to documents used during Fujitomo and Eguchi depositions and draft proposed responses (1.60); emails with V. Glaze re: coordination on responses to various translation objections (0.20); emails with S. Scarlett, D. Lambrinos and other lead counsel regarding coordinated responses to various objections to translations (0.20).	550.00	2.00	1,100.00	Billable
11/23/2015 207727	Nathan Cihlar WORK Finalize strategy for responses to various translation objections to documents used during Fujitomo and Eguchi depositions (1.00); incorporate DPP edits to the same (0.50); finalize and conduct legal analysis of replies to remaining objection translation issues from Toshiba SJM (0.70); emails with V. Glaze regarding same (0.20); review documents ready for recertification (0.20); emails with S. Scarlett, D. Lambrinos and other lead counsel regarding final draft of responses to objections to translations from recent depositions (0.40).	550.00	3.00	1,650.00	Billable
11/25/2015 207719	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding Joint Plaintiffs responses to translation objections to Fujitomo and Eguchi exhibits (0.20); finalize said responses (0.20); serve said responses to Defendants (0.20).	425.00	0.60	255.00	Billable
11/30/2015 207721	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding translations entered by DAPs at Fukai and Kubo depositions (0.20); review and analyze said translations for potential translation errors to object to (0.60); e-mails with S. Nagano regarding same (0.20).	425.00	1.00	425.00	Billable
11/30/2015 207728	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding issues related to translations entered by DAPs at recent Fukai and Kubo depositions and devise strategy for objections to the same.	550.00	0.60	330.00	Billable
12/1/2015 208088	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding issues raised by lead counsel related to translation objection to DAP filed documents in depositions and discuss formulation of responses to same (0.20); emails with V. Glaze regarding same (0.10).	550.00	0.30	165.00	Billable
12/14/2015 207951	Shinae Kim-Helms WORK Review translations of Donny Lee exhibits entered by Defendants (3.00); compare same with foreign original documents (2.50); prepare draft translation objections to Defendants Donny Lee exhibits (0.60).	425.00	6.10	2,592.50	Billable
12/17/2015 207958	Shinae Kim-Helms WORK Review and analyze Donny Lee deposition exhibits - both certified translations and foreign originals - entered by Defendants (1.40); prepare objections to Donny Lee deposition exhibit translations (1.30).	425.00	2.70	1,147.50	Billable
12/18/2015 207961	Shinae Kim-Helms WORK Receive and review Defendants objections to deposition translations entered at Fukai and Kubo	425.00	4.50	1,912.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	depositions (0.50); e-mails with V. Glaze and N. Cihlar regarding same (0.40); e-mail to S. Nagano to assign IPPs portions to prepare responses to Defendants translation objections (0.40); continue to prepare objections to Donny Lee deposition exhibit translations (3.20).				
12/18/2015 208102	Nathan Cihlar WORK Review Defendants' objections to deposition translations entered at Fukai and Kubo depositions and formulate response based on timeliness (0.30); emails with V. Glaze and S. Kim-Helms regarding approach to responses to the same (0.20).	550.00	0.50	275.00	Billable
12/21/2015 207964	Shinae Kim-Helms WORK Review and analyze Donny Lee deposition exhibits - both certified translations and foreign originals - entered by Defendants (2.00); prepare objections to Donny Lee deposition exhibit translations (1.50).	425.00	3.50	1,487.50	Billable
12/21/2015 208103	Nathan Cihlar WORK Review, analyze proposed objections to translations from D. Lee deposition and formulate foreign team strategy for responses to same; draft/edit potential response spreadsheet related to the same (1.80); teleconference with S. Kim-Helms regarding objections and responses for managing foreign translation team (0.30).	550.00	2.10	1,155.00	Billable
12/28/2015 208105	Nathan Cihlar WORK Review and analysis of proposed responses to objections to translations by foreign team related to D. Lee (1.00); finalize responses and formulate spreadsheet related to the same (1.00).	550.00	2.00	1,100.00	Billable
12/30/2015 208061	Shinae Kim-Helms WORK Review Defendants objections to translation entered at Matsumoto deposition (0.30); e-mails with N. Cihlar and V. Glaze regarding service (0.20).	425.00	0.50	212.50	Billable
12/30/2015 208106	Nathan Cihlar WORK Emails with V. Glaze regarding issues related to coordination with DPPs in translation objections, timeliness of Defendants objections (0.20); analyze new translation objections from Defendants re: Matsumoto and design strategy for foreign team responses to the same (0.20); teleconference with S. Kim-Helms regarding assignments and management issues for the same (0.20); finalize spreadsheet with responses to objections to translations from D. Lee deposition (0.30); emails with V. Glaze of DPPs regarding same (0.10); teleconference with S. Kim-Helms regarding same (0.10); emails with S. Scarlett and other co-lead regarding status of translation objections (0.10).	550.00	1.20	660.00	Billable
1/4/2016 208248	Shinae Kim-Helms WORK E-mails with V. Glaze regarding Kondo deposition exhibits entered by Defendants and DAPs and preparing translations objections to same (0.50); review exhibits entered at Tachihara, Chung and Takeshima depositions (0.50); e-mails with R. Noh regarding same (0.50).	425.00	1.50	637.50	Billable
1/5/2016 208250	Shinae Kim-Helms WORK Review deposition translations entered by Defendants and DAPs (0.40); e-mails with V. Glaze to prioritize preparing objections to Defendants and DAPs translations and drafting responses to Defendants objections to various deposition exhibits (0.40); e-mails with R. Noh regarding deposition translations entered by Defendants and DAPs (0.40).	425.00	1.20	510.00	Billable
1/6/2016 208253	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Defendants translation objections regarding Fukai and Kubo depositions (0.30); teleconference with N. Cihlar regarding status of Plaintiffs' translation objections and responses to Defendants translation objections (0.30).	425.00	0.60	255.00	Billable
1/8/2016 208257	Shinae Kim-Helms WORK Review and finalize Plaintiffs' objections to Donny Lee deposition translations and serve Defendants with same.	425.00	0.50	212.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/8/2016 208651	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding finalization of formation of responses to D. Lee objections (0.20); update spreadsheet regarding same to incorporate legal analysis. (0.10).	550.00	0.30	165.00	Billable
1/11/2016 208260	Shinae Kim-Helms WORK Review and revise draft Plaintiffs' responses to Fukai and Kubo translations by S. Nagano (0.50); e-mails with R. Noh regarding missing translation objected to by Defendants (0.50); e-mails with N. Cihlar regarding same (0.50).	425.00	1.50	637.50	Billable
1/11/2016 208602	Carla Voigt WORK [redacted]	300.00	0.20	60.00	Billable
1/14/2016 208268	Shinae Kim-Helms WORK E-mails with S. Nagano and R. Noh regarding translation entered by Defendants in Tachihara deposition (0.40); e-mails with S. Nagano regarding DAPs translations entered by IPPs and DPPs (0.40); teleconference with N. Cihlar and C. Voigt regarding same (0.50); teleconference with V. Glaze regarding cooperation with DAPs on translation-related issues (0.50); draft email regarding issues related to DAP translations entered at various depositions per N. Cihlars request (1.20); combine IPPs and DPPs draft responses to Defendants' objections to translations entered at Fukai and Kubo depositions (1.20).	425.00	4.20	1,785.00	Billable
1/15/2016 208270	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding issues pertaining to DAP translations (0.70); e-mails with S. Nagano regarding errors found in DAP translations (0.40); review draft Plaintiffs objections to Tachihara and Kondo translations entered by DAPs (1.10); review and revise email drafted by N. Cihlar (1.30); review Master exhibit chart prepared by R. Noh and A. Gooding (1.50); e-mails with R. Noh and A. Gooding regarding same (0.40); e-mail to N. Cihlar regarding status of master exhibit chart (0.40).	425.00	5.80	2,465.00	Billable
1/16/2016 208271	Shinae Kim-Helms WORK Continue to draft Plaintiffs objections to Tachihara and Kondo translations entered by DAPs (0.80); review each translation entered by DAPs at Tachihara and Kondo deposition for glaring errors (0.50); review and revise draft e-mail regarding issues related to translations entered by DAPs (0.80); e-mails with N. Cihlar regarding same (0.40).	425.00	2.50	1,062.50	Billable
1/19/2016 208272	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding status of objections to Tachihara translations (0.50); e-mails with V. Glaze regarding status of DAPs objections to Tachihara exhibits (0.40); e-mails with S. Nagano regarding same (0.40); receive Defendants correspondence regarding Plaintiffs objections to Donny Lee translations (0.20); receive and review Defendants objections to same (0.30); e-mails with N. Cihlar regarding same (0.40); e-mails with R. Noh regarding master exhibit list (0.40).	425.00	2.60	1,105.00	Billable
1/19/2016 208450	Nathan Cihlar WORK Review and legal analysis of proposed translation responses to translation objections submitted in recent depositions by DAPs (0.70); teleconference with V. Glaze regarding DPP concern with the translations and desire to object to the same (0.60); final edit translation objection chart related to potential objections to DAPS (0.50); discuss issues with management of responses and coordination of translation issues with S. Kim Helms (0.20).	550.00	2.00	1,100.00	Billable
1/20/2016 208273	Shinae Kim-Helms WORK E-mails with S. Nagano regarding competing versions of translations entered by DAPs and IPPs at Tachihara deposition (0.40); teleconference with N. Cihlar to discuss strategy to respond to Defendants correspondences regarding Plaintiffs objections to translations entered by DAPs (0.50); review and revise draft email regarding same (1.90); prepare Plaintiffs objections to translations entered at Tachihara deposition (2.20); review and analyze exhibits cited in said objections (1.70); e-mails with R. Noh regarding master exhibit list and uploading translations entered by Defendants and DAPs to shared site (0.40).	425.00	7.10	3,017.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/20/2016 208453	Nathan Cihlar WORK Legal analysis of translation objections to Defendants translations from Tachihara depositon (0.50); analyze and design strategic approach to Defendants objections to translations from Donny Lee deposition (0.30).	550.00	0.80	440.00	Billable
1/21/2016 208274	Shinae Kim-Helms WORK E-mails with S. Nagano regarding competing versions of translations entered by DAPs and IPPs at Tachihara deposition (0.40); review and revise draft email regarding Plaintiffs objections to Tachihara deposition (1.80); prepare Plaintiffs objections to translations entered at Takeshima and Kondo depositions (2.30); review and analyze exhibits cited in said objections (2.00); e-mails with N. Cihlar and R. Noh regarding master exhibit list (0.40); forward same to S. Scarlett (0.20); e-mail to DPPs and IPPs translation management teams regarding newly uploaded translations entered by Defendants and DAPs (0.40).	425.00	7.50	3,187.50	Billable
1/21/2016 208475	Nathan Cihlar WORK Review and analysis of translations submitted in recent depositions by DAPs and formulate approach to responses with foreign review team (0.30); emails with V. Glaze regarding coordination with DPP issues (0.30); analysis of any potential objections proposed by DPPs (0.20); review and strategic analysis of objections from Defendants for translations in Fukai and Kubo depositions (1.00); edit current spreadsheet responses to the same and formulate final proposed IPP responses (0.90).	550.00	2.70	1,485.00	Billable
1/22/2016 208275	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Toshibas translations filed as exhibits to Hague Declaration in Support of Toshiba's Reply Memo in Support of MSJ on Withdrawal (0.90); e-mail discussion with DPPs to split translation objection projects (0.30); prepare Plaintiffs objections to translations entered at Takeshima and Kondo depositions (2.80); review and analyze exhibits cited in said objections (2.60).	425.00	6.60	2,805.00	Billable
1/22/2016 208457	Nathan Cihlar WORK Update draft response to various translation objections filed by Defendants to ensure proper legal implications of taking into account responses (0.60); teleconference with S. Kim-Helms regarding same (0.20).	550.00	0.80	440.00	Billable
1/25/2016 208276	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding strategy to handle DAPs translations (0.40); review e-mail correspondences between DPPs and N. Cihlar regarding same (0.90); prepare Plaintiffs objections to translations entered at Fukai and Kubo depositions (2.70); review and analyze exhibits cited in said objections (2.20); e-mails with S. Nagano regarding same (0.60).	425.00	6.80	2,890.00	Billable
1/25/2016 208461	Nathan Cihlar WORK Emails with V. Glaze regarding proposed responses by DPPs to set of objections to translations and issues related to DAP translations (0.50).	550.00	0.50	275.00	Billable
1/26/2016 208568	Shinae Kim-Helms WORK Review informal translations identified by L. Chan to be used by DPPs (0.90); prepare Plaintiffs responses to translations entered at Fukai and Kubo depositions (2.30); review said translations entered at Fukai and Kubo depositions (1.20); finalize said responses and forward same to N. Cihlar (0.60).	425.00	5.00	2,125.00	Billable
1/29/2016 208477	Nathan Cihlar WORK Update/draft strategic responses to objections from Defendants from recent translations entered at deposition (2.80); emails with V. Glaze regarding IPP position as it related to DAP translations (0.70).	550.00	3.50	1,925.00	Billable
1/29/2016 208577	Shinae Kim-Helms WORK Review e-mail correspondences between N. Cihlar and DPPs regarding strategy to handle translations entered by DAPs (0.90); e-mails with S. Nagano regarding exhibit entered by Plaintiffs at	425.00	6.10	2,592.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Takeshima deposition and re-entered by Toshiba at later time (0.40); review and analyze Defendants objections to translations entered by Plaintiffs at Matsumoto deposition (1.60); review draft responses prepared by S. Nagano and DPPs (1.00); revise said responses (0.90); review and analyze materials cited in said objections (1.30).				
2/1/2016 208580	Shinae Kim-Helms WORK E-mails with V. Glaze regarding Defendants objections to Plaintiffs objections to Toshiba MSJ (0.40); review and analyze Defendants objections to translations entered by Plaintiffs at Matsumoto deposition (1.30); review draft responses prepared by S. Nagano and DPPs (1.00); revise said responses (1.20); review and analyze materials cited in said objections (1.60).	425.00	5.50	2,337.50	Billable
2/1/2016 209141	Nathan Cihlar WORK Update/draft strategic responses to objections from Defendants from recent translations entered at deposition (1.30); emails with V. Glaze regarding issues related to DAP involvement with translations (0.20).	550.00	1.50	825.00	Billable
2/2/2016 209084	Shinae Kim-Helms WORK E-mails with DPPs regarding Korean translation objection-related issues and time line (0.20); e-mails with N. Cihlar regarding Toshiba translations entered at Takeshima deposition (0.30).	425.00	0.50	212.50	Billable
2/2/2016 209153	Nathan Cihlar WORK Review and revise Plaintiffs' joint objections to translation entered in the deposition of Takeshima and Kondo and finalize for service on Defendants (1.80); review and edit joint objections through strategic and legal analysis to documents entered in Takeshima deposition (0.20).	550.00	2.00	1,100.00	Billable
2/3/2016 209088	Shinae Kim-Helms WORK E-mails with V. Glaze regarding master translation objection chart (0.20); prepare master translation objection chart (0.20); teleconference with N. Cihlar regarding same (0.10).	425.00	0.50	212.50	Billable
2/3/2016 215569	Nathan Cihlar WORK Edit/draft and formulate final responses to translation objections related to Fukai and Kubo (2.60); draft/edit, analysis and formulation of responses to objections to translations from Takeshima (2.10); circulate final versions to DPPs (0.10).	550.00	4.80	2,640.00	Billable
2/8/2016 209143	Nathan Cihlar WORK Emails with V. Glaze regarding coordination with DPPs and finalization of objection responses related to Fukai and Kubo for circulation to the Defendants.	550.00	0.20	110.00	Billable
2/9/2016 209096	Shinae Kim-Helms WORK E-mails with S. Nagano regarding translation of Sony document in Japanese (0.40); review and revise draft Plaintiffs objections to translations entered by Toshiba in connection with Hogue Declaration (1.00); review and analyze cited materials (0.70); e-mails with N. Cihlar regarding same (0.40); review, revise and finalize Plaintiffs' joint responses to Defendants' objections to the translations entered in the depositions of Messrs. Fukai and Kubo and Plaintiffs' joint objections to the translations entered in the deposition of Mr. Takeshima (1.00); serve Defendants same (0.20); update Master translation objection chart (0.30); circulate to N. Cihlar and DPPs (0.20).	425.00	4.20	1,785.00	Billable
2/10/2016 209099	Shinae Kim-Helms WORK E-mails with V. Glaze and S. Nagano regarding Plaintiffs joint objections to translations entered by Toshiba in connection with Hogue Declaration ISO Toshiba's Reply ISO MSJ (1.00); review and revise said Plaintiffs joint objections (2.00); review Defendants objections to translations entered by Plaintiffs at Sumoto deposition (1.10); e-mails with V. Glaze regarding same (0.40).	425.00	4.50	1,912.50	Billable
2/11/2016 209144	Nathan Cihlar WORK Draft/edit and formulate final strategic responses to joint translation objections to documents entered as exhibits to Hogue Declaration re: SJM (3.50); teleconferences with S. Kim-Helms regarding analysis of the responses to same (0.20); emails with V. Glaze and DPPs for coordination (0.50).	550.00	4.20	2,310.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/12/2016 209106	Shinae Kim-Helms WORK Review, revise and finalize Plaintiffs joint translation objections to documents entered as exhibits to the Hogue Declaration in Support of Toshiba Corporation's Reply Memorandum in Support of its Motion for Summary Judgment on Withdrawal (0.40); e-mails with DPPs regarding final approval (0.20); serve same to Defendants (0.10).	425.00	0.70	297.50	Billable
2/16/2016 209110	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered by Plaintiffs in Matsumoto deposition (1.20); review draft responses prepared by S. Nagano (1.00); review and analyze cited materials (0.80).	425.00	3.00	1,275.00	Billable
2/16/2016 209147	Nathan Cihlar WORK Initial review of the translation objections from the Tachihara deposition (0.30); coordinate with DPPs on approach for response (0.10); teleconference with S. Kim-Helms regarding same (0.10).	550.00	0.50	275.00	Billable
2/17/2016 209113	Shinae Kim-Helms WORK Review and revise Plaintiffs joint responses to Defendants objections to translations entered in Matsumoto deposition (1.00); review and analyze cited materials (0.80); revise and prepare Plaintiffs joint responses to same (1.30); e-mails with S. Nagano to discuss pronouns objected to by Defendants (0.40).	425.00	3.50	1,487.50	Billable
2/18/2016 209116	Shinae Kim-Helms WORK E-mails with V. Glaze regarding status of outstanding responses to Defendants translation objections (0.20); revise and prepare Plaintiffs joint responses to same (1.00); discuss translation objection response strategy with S. Nagano (0.40); review and analyze Defendants objections to translations entered by Plaintiffs in Matsumoto deposition (0.40); review draft translations prepared by S. Nagano (0.30); review and analyze cited materials (0.40).	425.00	2.70	1,147.50	Billable
2/19/2016 209119	Shinae Kim-Helms WORK E-mails with DPPs and N. Cihlar regarding missing translation as identified in Defendants objections to Kubo and Fukai translations (0.40); finalized missing translation objected to by Defendants (0.20); serve said translation to Defendants (0.20); review and analyze Defendants objections to translations entered by Plaintiffs in Matsumoto deposition (0.60); revise and prepare Plaintiffs joint responses to same (0.60).	425.00	2.00	850.00	Billable
2/23/2016 209126	Shinae Kim-Helms WORK Review and finalize missing translation identified in Defendants objections to Fukai and Kubo translations (0.30); circulate same to Defendants (0.20); review and analyze Defendants objections to Plaintiffs translations entered at Matsumoto deposition (0.50); revise and finalize Plaintiffs joint responses to same (0.60); review cited materials (0.40).	425.00	2.00	850.00	Billable
2/24/2016 209129	Shinae Kim-Helms WORK Receive and review DPPs draft responses to Defendants objections to Plaintiffs translations entered at Sumoto deposition (0.70); e-mails with V. Glaze regarding same (0.40); e-mail S. Nagano Defendants objections to Plaintiffs translations entered at Shimizu deposition (0.40); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.80); review and revise draft translations prepared by DPPs (0.80); review cited materials (0.40).	425.00	3.50	1,487.50	Billable
2/24/2016 209148	Nathan Cihlar WORK Emails with V. Glaze and S. Kim-Helms regarding issues related to coordination on translation objections related to Sumoto and Chung (0.30); review, analysis and formulation of final responses to objections to translations related to Chung and discuss same with S. Kim-Helms (0.50).	550.00	0.80	440.00	Billable
2/25/2016 209132	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of	425.00	3.10	1,317.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Plaintiffs opposition to Toshibas Summary Judgment Motion (0.50); review and revise draft translations prepared by DPPs (0.50); review cited materials (0.20); e-mail with N. Cihlar regarding same (0.40); receive and review documents requested for certified translation by J. Moy and A. Kikuchi for Sawai deposition (0.30); search for duplicates and near duplicates in database (0.20); e-mails with J. Moy regarding time line (0.40); request certified translation of same to Consortra (0.20); e-mails with D. Lambrinos regarding informal translation that need to be certified (0.20); request certified translation of same to Consortra (0.20).				
2/25/2016 209154	Nathan Cihlar WORK Review, revise plaintiffs' final joint response to Defendants' translation objections to exhibits entered in the Matsumoto deposition.	550.00	3.50	1,925.00	Billable
2/26/2016 209135	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.70); review and revise draft translations prepared by DPPs (0.90); review cited materials (0.90).	425.00	2.50	1,062.50	Billable
2/28/2016 209138	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.70); review and revise draft translations prepared by DPPs (0.50); review cited materials (0.50); e-mails with S. Nagano regarding Defendants duplicate objections to same translations (0.20); e-mails with R. Noh regarding same (0.20).	425.00	2.10	892.50	Billable
3/1/2016 209438	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (1.40); review and revise draft responses prepared by DPPs (1.00); review cited materials (0.90); e-mails with N. Cihlar regarding Defendants duplicate objections to same translations (0.40).	425.00	3.70	1,572.50	Billable
3/1/2016 209651	Nathan Cihlar WORK Review/analysis, revise plaintiffs' final joint response to Defendants' translation objections to exhibits entered in the Matsumoto deposition.	550.00	2.50	1,375.00	Billable
3/1/2016 209667	Richard Noh WORK Assist S. Kim-Helms with research related to overlapping translation objections.	155.00	1.00	155.00	Billable
3/2/2016 209441	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (1.00); review and revise draft responses prepared by DPPs (0.50); review cited materials (0.80); e-mails with S. Nagano regarding Defendants duplicate objections to same translations (0.40); e-mails with R. Noh regarding additional translations Defendants objected to twice (0.40).	425.00	3.10	1,317.50	Billable
3/2/2016 209668	Richard Noh WORK Assist S. Kim-Helms with research related to overlapping translation objections.	155.00	1.00	155.00	Billable
3/3/2016 209444	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (1.60); review cited materials (0.90); e-mails with S. Nagano regarding Defendants duplicate objections to same translations (0.80); e-mails with R. Noh regarding additional translations Defendants objected to twice (0.60).	425.00	3.90	1,657.50	Billable
3/4/2016 209447	Shinae Kim-Helms WORK Brief review of translation objections served by Defendants (0.20); email to DPPs to propose work assignments (0.40); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.50); review and	425.00	2.50	1,062.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	revise draft responses prepared by DPPs (0.50); review cited materials (0.90).				
3/4/2016 215412	Richard Noh WORK Assist S. Kim-Helms with research related to overlapping translation objections (0.80); update translation status per the request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
3/7/2016 209450	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding draft Plaintiffs Joint Responses to Defendants objections to Translation entered in Matsumoto deposition (0.30); review email correspondences between N. Cihlar, L. Chan and DPPs regarding same (0.60); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.50); prepare draft responses to said objections (0.50); review cited materials (0.20).	425.00	2.10	892.50	Billable
3/7/2016 209652	Nathan Cihlar WORK Revise and formulate plaintiffs' final joint response to Defendants' translation objections to exhibits entered in the Matsumoto deposition to include DPP suggestions (2.10); emails with V. Glaze regarding same (0.20); emails with S. Scarlett, L. Chan and others regarding final version to circulate to defendants and issues arising in objections to translations (0.20).	550.00	2.50	1,375.00	Billable
3/8/2016 209453	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding Tachihara translation objections (0.40); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.50); prepare draft responses to said objections (0.50); review cited materials (0.40).	425.00	1.80	765.00	Billable
3/8/2016 209653	Nathan Cihlar WORK Review and analysis of objections from Defendants related to translations from Tachihara and design strategy structure for review of same (0.60); e-mails with S. Kim-Helms regarding approach to response and assignments for review (0.10).	550.00	0.70	385.00	Billable
3/9/2016 209456	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.20); prepare draft responses to said objections (0.20); review cited materials (0.10).	425.00	0.50	212.50	Billable
3/10/2016 209460	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.50); prepare draft responses to said objections (0.50); review cited materials (0.50).	425.00	1.50	637.50	Billable
3/10/2016 209655	Nathan Cihlar WORK Review and analysis of objections from Defendants related to 2nd/3rd responses related to translations from Eguchi, Fujitomo, and SJM and formulate strategy for responses to same (1.40); teleconference with S. Kim-Helms regarding approach to response and assignments for review (0.30).	550.00	1.70	935.00	Billable
3/11/2016 209463	Shinae Kim-Helms WORK Receive and review email from Defense counsel regarding missing translations in Plaintiffs Class Cert Brief (0.50); teleconference with N. Cihlar regarding same (0.30); email to S. Scarlett and other co-counsel with translations missing in said Plaintiffs Class Cert Brief (0.20).	425.00	1.00	425.00	Billable
3/11/2016 209535	Anna Gooding WORK Pull translations related defendant translation objections (0.50).	155.00	0.50	77.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/14/2016 209467	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (0.60); prepare draft responses to said objections (0.40); review cited materials (0.20).	425.00	1.20	510.00	Billable
3/15/2016 209491	Shinae Kim-Helms WORK E-mail to Defense Translation Liaison Counsel regarding incomplete translation objections served prior week (0.50); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (1.00); prepare draft responses to said objections (0.50); review cited materials (0.50).	425.00	2.50	1,062.50	Billable
3/15/2016 215418	Richard Noh WORK Assist S. Kim-Helms with research related to overlapping translation objection (1.50)	155.00	1.50	232.50	Billable
3/16/2016 209494	Shinae Kim-Helms WORK E-mails with S. Nagano regarding terms frequently objected to by Defendants.	425.00	0.20	85.00	Billable
3/17/2016 209497	Shinae Kim-Helms WORK Revise and finalize Plaintiffs first responses to Defendants translations entered in Matsumoto depositions (1.00); e-mails with N. Cihlar regarding same (0.40); serve same to Defendants (0.20); update and circulate master translation objection chart (0.20); review same for finalized translations to be recertified (0.80); prepare list of translations to be recertified (0.80); e-mails with R. Noh and N. Cihlar regarding same (0.40).	425.00	3.80	1,615.00	Billable
3/17/2016 209657	Nathan Cihlar WORK Final edits and review of Matsumoto translation objection responses to ensure accuracy and proper coordination with DPPs prior to circulation to Defendants (0.50).	550.00	0.50	275.00	Billable
3/18/2016 209500	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in support of Plaintiffs opposition to Toshibas Summary Judgment Motion (1.80); prepare draft responses to said objections (1.00); review cited materials (0.90); e-mail to R. Noh to correct and revise formats of exhibits objected to by Defendants (0.50); e-mails with R. Noh regarding recertification requests to Consortra (0.10); review Translation Protocol and review and revise draft recertification request email by R. Noh (0.20).	425.00	4.50	1,912.50	Billable
3/18/2016 209658	Nathan Cihlar WORK Review and analyze translations and responses to objections to Plaintifffs' translations entered as exhibits in support of Plaintiffs' opposition to SJM and edit final draft responses to the same.	550.00	3.60	1,980.00	Billable
3/21/2016 209503	Shinae Kim-Helms WORK E-mails with R. Noh regarding Defendants recertified translations to be uploaded to shared site and translation tracking chart to be updated (0.50); review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Dong Woo Lee (1.00); prepare draft responses to said objections (1.20); review cited materials (0.50).	425.00	3.20	1,360.00	Billable
3/22/2016 209506	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Dong Woo Lee (0.80); prepare draft responses to said objections (0.40); review cited materials (0.90).	425.00	2.10	892.50	Billable
3/23/2016 209509	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Sumoto (0.80); review and revise draft responses to said objections prepared by S. Nagano (0.20); review cited materials (0.10).	425.00	1.10	467.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/23/2016 215419	Richard Noh WORK Assist S. Kim-Helms with research related to overlapping translation objections.	155.00	1.00	155.00	Billable
3/24/2016 209512	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Sumoto (1.00); review and revise draft responses to said objections prepared by S. Nagano (0.50); e-mails with R. Noh regarding translations objected to by Defendants more than once (0.20).	425.00	1.70	722.50	Billable
3/24/2016 209646	Richard Noh WORK Update translation objections chart per the request of S. Kim-Helms (1.00); prepare translations for recertification (1.50); email correspondence with translation company regarding the same (0.50).	155.00	3.00	465.00	Billable
3/25/2016 209515	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Sumoto (1.60); review and revise draft responses to said objections prepared by S. Nagano and DPPs (1.20); review cited materials (0.50); e-mails with S. Nagano regarding draft responses prepared by DPPs (0.40).	425.00	3.70	1,572.50	Billable
3/29/2016 209661	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Sumoto (0.80); revise and finalize draft responses to said objections prepared by S. Nagano and DPPs (0.80); review cited materials (0.40); e-mail with R. Noh regarding draft email for DAPs to use to re-certify translation where objections have been resolved (0.80); e-mail same to N. Cihlar (0.30).	425.00	3.10	1,317.50	Billable
3/30/2016 209662	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Sumoto (0.40); revise and finalize draft responses to said objections prepared by S. Nagano and DPPs (0.40); review cited materials; e-mails with S. Nagano regarding same (0.20).	425.00	1.00	425.00	Billable
3/31/2016 209659	Nathan Cihlar WORK Review and analyze responses to objections to Plaintifffs' translations entered as exhibits in support of Plaintiffs' opposition to SJM; edit draft responses to the same (2.00); teleconference with S. Kim-Helms regarding outstanding sets of Defendant objections and strategy for responses (0.50); review final versions of translations to send to TransPerfect for recertification (0.70).	550.00	3.20	1,760.00	Billable
3/31/2016 209664	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered as exhibits in deposition of Tachihara (0.30); teleconference with N. Cihlar regarding three recent sets of responses to Defendants translation objections and status of recertified translations (0.20).	425.00	0.50	212.50	Billable
4/5/2016 210036	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding various issues related to objections to translations, management of foreign team assignments, conflicting objections from various defendants (0.50); review and analysis of proposed responses to conflicting objections, and strategize to formulate final responses to the same (2.00).	550.00	2.50	1,375.00	Billable
4/6/2016 210045	Carla Voigt WORK Review email from K. Pachman to T. Pham routing all discovery requests and responses served to date; review and analysis of same.	300.00	0.50	150.00	Billable
4/7/2016 210037	Nathan Cihlar WORK Review, revise, and analyze various entries re: Plaintiffs' joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment and finalize for service on Defendants.	550.00	3.00	1,650.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/8/2016 210047	Carla Voigt WORK Review email from K. Pachman routing defendants' second set of requests for production and draft responses and objections and route to T. Pham per request of K. Pachman (0.30); email exchanges with T. Pham and K. Pachman regarding same (0.20).	300.00	0.50	150.00	Billable
4/8/2016 210066	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Defendants translation objections regarding Kondo deposition exhibits (0.30); e-mails with V. Glaze regarding same (0.20).	425.00	0.50	212.50	Billable
4/12/2016 210070	Shinae Kim-Helms WORK Confer with N. Cihlar to discuss re-certified versions of translations to be circulated to Plaintiff groups and Defense counsel (0.20); draft e-mail to circulate recertified translations (0.20); e-mails with V. Glaze regarding upcoming translation objection issues (0.10).	425.00	0.50	212.50	Billable
4/13/2016 210038	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding re-certified versions of documents (0.30); review finalized recerts to ensure accuracy and legal position maintained (0.50).	550.00	0.80	440.00	Billable
4/13/2016 210049	Carla Voigt WORK Review email exchange between D. Lambrinos and E. Pickar (0.10); [redacted] (0.30); emails regarding same (0.10).	300.00	0.50	150.00	Billable
4/14/2016 210050	Carla Voigt WORK Meetings with N. Cihlar regarding drafting joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment; review and revise same.	300.00	3.00	900.00	Billable
4/15/2016 210051	Carla Voigt WORK Continue to review and revise Plaintiffs' joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment per N. Cihlar.	300.00	2.00	600.00	Billable
4/15/2016 210075	Shinae Kim-Helms WORK Provide Defendants with recertified versions of translations Plaintiffs prepared.	425.00	0.20	85.00	Billable
4/17/2016 210040	Nathan Cihlar WORK Draft, revise and formulate proposed Plaintiffs' joint response to objections to translations from Toshiba motion for summary judgment in line with IPP position.	550.00	3.00	1,650.00	Billable
4/18/2016 215410	Nathan Cihlar WORK Draft, revise and formulate proposed Plaintiffs' joint response to objections to translations from Toshiba motion for summary judgment in line with IPP position.	550.00	2.00	1,100.00	Billable
4/19/2016 210054	Carla Voigt WORK Meetings with N. Cihlar regarding objections to translations draft response (0.20); continue to review and revise Plaintiffs' joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment (2.50); incorporate additional edits of N. Cihlar and S. Kim-Helms (0.50).	300.00	3.20	960.00	Billable
4/20/2016 210041	Nathan Cihlar WORK Draft, revise and formulate proposed Plaintiffs' joint response to objections to translations from Toshiba motion for summary judgment.	550.00	4.00	2,200.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/25/2016	Nathan Cihlar	550.00	3.00	1,650.00	Billable
210042	WORK				
	Draft, revise and formulate proposed Plaintiffs' joint response to objections to translations from Toshiba motion for summary judgment.				
4/25/2016	Carla Voigt	300.00	4.00	1,200.00	Billable
210058	WORK				
	Confer with N. Cihlar regarding revisions to Plaintiffs' joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment (0.50); teleconference with S. Kim-Helms regarding issues related to same (0.50); revise objections per N. Cihlar's edits (3.00).				
4/25/2016	Shinae Kim-Helms	425.00	2.10	892.50	Billable
210081	WORK				
	E-mails with N. Cihlar regarding status of re-certified translations to be circulated to Defendants (0.20); teleconference with N. Cihlar and A. Gooding regarding Plaintiffs joint responses to Defendants objections to Plaintiffs translations entered in opposition to Toshibas SJM (0.60); e-mails with C. Voigt regarding translation objections to Plaintiffs opposition to Toshibas SJM (0.30); review exhibits cited in said objections (0.50); proofread draft translations of SDI document requested for IS Jeon deposition (0.50).				
4/26/2016	Carla Voigt	300.00	1.50	450.00	Billable
210059	WORK				
	Finalize Plaintiffs' joint responses to Defendants' objections to translations entered in opposition to Toshiba motion for summary judgment per N. Cihlar edits (1.10); organize all related documents for service (0.40).				
4/27/2016	Nathan Cihlar	550.00	2.50	1,375.00	Billable
210044	WORK				
	Draft, revise and formulate proposed Plaintiffs' joint response to objections to translations from Toshiba motion for summary judgment (2.00); emails with V. Glaze regarding coordination of the same (0.20); emails with S. Scarlett, co-lead regarding finalization of set of responses (0.30).				
4/27/2016	Shinae Kim-Helms	425.00	0.50	212.50	Billable
210084	WORK				
	Review draft Plaintiffs Joint Responses to Defendants translation objections to Opposition to Toshiba SJM.				
4/29/2016	Shinae Kim-Helms	425.00	1.50	637.50	Billable
210089	WORK				
	Receive and review recertified translations from Defendants (0.20); e-mails with R. Noh regarding same (0.40); e-mails with N. Cihlar and V. Glaze regarding same (0.30); e-mail to Defendants requesting correction to said recertified translations (0.40); e-mails with A. Gooding regarding Defendants translations entered with briefs (0.10); e-mails with N. Cihlar regarding same (0.10).				
5/2/2016	Shinae Kim-Helms	425.00	3.70	1,572.50	Billable
210091	WORK				
	Review and analyze Defendants translations entered as exhibits to Ryu declaration in support of LGCs position in Joint Letter brief re JJ Joe (2.10); prepare objections to said translations (1.60).				
5/2/2016	Carla Voigt	300.00	2.00	600.00	Billable
210666	WORK				
	Draft, update compliation of Plaintiffs' first joint response to Defendants' objections to translations entered in the depositions of Dong Woo Lee and Sumoto per S. Kim-Helms; route to N. Cihlar for final review.				
5/3/2016	Shinae Kim-Helms	425.00	0.50	212.50	Billable
210674	WORK				
	Review and analyze Defendants translations entered as exhibits to Ryu declaration in support of LGCs position in Joint Letter brief re JJ Joe (0.30); prepare objections to said translations (0.20).				
5/4/2016	Shinae Kim-Helms	425.00	4.90	2,082.50	Billable
210677	WORK				
	E-mails with R. Noh regarding accuracy of recertified translations prepared by Defendants (1.00); e-mails with DPPs and N. Cihlar regarding same (0.40); e-mail to Defense Counsel regarding same (0.40); finalize Plaintiffs' joint first responses to Defendants' objections to translations entered as exhibits to Plaintiffs' Opposition to Toshiba's Motion for Summary Judgment (0.40); serve same to				

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Defendants (0.10); update master translation tracking chart (0.10); review and analyze Defendants translations entered as exhibits to Ryu declaration in support of LGCs position in Joint Letter brief re JJ Joe and McGowan Lemberg Declaration (1.00); prepare objections to said translations (1.50).				
5/6/2016 210667	Carla Voigt WORK Review and revise Plaintiffs' joint objections to translations entered as exhibits to the Ryu declaration and incorporate edits of N. Cihlar and S. Kim-Helms.	300.00	0.80	240.00	Billable
5/6/2016 210682	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (1.00); review and revise draft responses to said translation objections prepared by DPPs (0.80).	425.00	1.80	765.00	Billable
5/6/2016 210742	Nathan Cihlar WORK Analyze, revise, and formulate final Plaintiffs' joint objections to translations entered as exhibits to the Ryu declaration.	550.00	0.50	275.00	Billable
5/9/2016 210685	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (1.00); review and revise draft responses to said translation objections prepared by DPPs (0.60).	425.00	1.60	680.00	Billable
5/9/2016 210743	Nathan Cihlar WORK Analyze, revise, and formulate Plaintiffs' joint translation objections to translations from Tachihara declarations and review potential responses to objections to translations from Sumoto deposition (5.30); conferences regarding same with S. Kim-Helms (0.20).	550.00	5.50	3,025.00	Billable
5/10/2016 210688	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (2.00); review and revise draft responses to said translation objections prepared by DPPs and S. Nagano (1.80).	425.00	3.80	1,615.00	Billable
5/11/2016 210691	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (0.30); review and revise draft responses to said translation objections prepared by DPPs and S. Nagano (0.20).	425.00	0.50	212.50	Billable
5/12/2016 210694	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (1.40); review and revise draft responses to said translation objections prepared by DPP counsel and S. Nagano (1.40).	425.00	2.80	1,190.00	Billable
5/12/2016 210744	Nathan Cihlar WORK Finalize spreadsheet with coordinated responses to objections to translations from Ryu declaration (0.90); teleconference with S. Kim-Helms regarding same (0.10).	550.00	1.00	550.00	Billable
5/13/2016 210697	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (1.00); review and revise draft responses to said translation objections prepared by DPPs and S. Nagano (1.10); e-mails with S. Nagano regarding same (0.50); serve Plaintiffs objections to Defendants translations entered as exhibits in Ryu declaration on Defendants (0.50); update master translation objection chart (0.40).	425.00	3.50	1,487.50	Billable
5/16/2016 210700	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered as exhibits in Tachihara (2.00); review and revise draft responses to said translation objections prepared by DPPs and S. Nagano (1.40).	425.00	3.40	1,445.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/17/2016 210745	Nathan Cihlar WORK Analysis and edits of Plaintiffs' first responses to Defendants' translation of objections to exhibits entered in the Tachihara deposition and formulate final responses to Defendants.	550.00	3.00	1,650.00	Billable
5/19/2016 210709	Shinae Kim-Helms WORK Review recertified translations (0.20); review Plaintiffs responses to Defendants translation objections for additional translations to be recertified (0.30).	425.00	0.50	212.50	Billable
5/24/2016 210715	Shinae Kim-Helms WORK Review and analyze Defendants' objections to translations entered as exhibits in YW Chung deposition (1.00); review materials cited in said objection set (0.20); prepare responses to same (0.30).	425.00	1.50	637.50	Billable
5/25/2016 210671	Carla Voigt WORK Conference with N. Cihlar regarding Plaintiffs' responses to translation objections to exhibits entered in the depositions of Donny Lee and Sumoto (0.30); review and revise same per N. Cihlar's edits (1.10); teleconference with S. Kim-Helms regarding same (0.60).	300.00	2.00	600.00	Billable
5/25/2016 210718	Shinae Kim-Helms WORK Continue to review and analyze Defendants' objections to translations entered as exhibits in YW Chung deposition (1.50); review materials cited in said objection set (0.50); prepare responses to same (0.70); e-mails with R. Noh to reformat YW Chung exhibits objected to by Defendants (0.40).	425.00	3.10	1,317.50	Billable
5/25/2016 210746	Nathan Cihlar WORK Review, revise literal translation options of objections to translations from Sumoto deposition and formulate final response (5.60); conferences regarding same with S. Kim-Helms and C. Voigt (0.40).	550.00	6.00	3,300.00	Billable
5/26/2016 210672	Carla Voigt WORK Review and revise summary of Defendants' objections to Sumoto exhibits incorporating edits of N. Cihlar.	300.00	1.00	300.00	Billable
5/26/2016 210720	Shinae Kim-Helms WORK Continue to review and analyze Defendants' objections to translations entered as exhibits in Takeshima deposition (0.80); review materials cited in said objection set (0.90); review and revise responses prepared by DPPs to same (0.40); review exhibits entered by DAPs in Shimizu deposition (0.30); prepare summary based on same (0.80).	425.00	3.20	1,360.00	Billable
5/26/2016 210747	Nathan Cihlar WORK Review literal translations options of objections to translations from Sumoto deposition and formulate final responses (0.80); conferences regarding same with S. Kim-Helms (0.20); draft emails routing the same to the IPP and DPP teams (0.20).	550.00	1.20	660.00	Billable
5/30/2016 210725	Shinae Kim-Helms WORK E-mails with S. Nagano regarding translations entered by Defendants in Shimizu depositions.	425.00	0.30	127.50	Billable
6/1/2016 210966	Shinae Kim-Helms WORK E-mails with V. Glaze regarding translations used by Defendants in Defendants Opposition to Class Cert Brief (0.20); e-mails with V. Glaze and N. Cihlar whether to allow Defendants to extend deadline to serve translation objections regarding Shimizu (0.30); review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (0.50); review materials cited in said objection set (0.20); prepare responses to same (0.30).	425.00	1.50	637.50	Billable
6/2/2016 210957	Shinae Kim-Helms WORK Review Plaintiffs exhibits entered in Shimizu depositions (0.90); cross-check same against exhibit chart and other competing versions of translations (0.20); e-mails with R. Noh regarding same	425.00	4.00	1,700.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.30); prepare list of operative versions of translations of exhibits entered in Shimizu deposition per N. Cihlar (0.40); review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (0.40); review materials cited in said objection set (0.50); prepare responses to same (0.40); e-mails with R. Noh regarding recertified translations to be uploaded in shared site (0.10); review same (1.00).				
6/2/2016 211038	Richard Noh WORK Assist S. Kim-Helms with translation objections (0.80); email correspondence with translation company, V. Glaze and S. Nagano regarding revisions to translations (0.20).	155.00	1.00	155.00	Billable
6/3/2016 210960	Shinae Kim-Helms WORK Review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (0.40); review materials cited in said objection set (0.40); prepare responses to same (0.40).	425.00	1.20	510.00	Billable
6/6/2016 210963	Shinae Kim-Helms WORK Review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (0.20); review materials cited in said objection set (0.10); prepare responses to same (0.20).	425.00	0.50	212.50	Billable
6/7/2016 210967	Shinae Kim-Helms WORK Review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (1.30); review materials cited in said objection set (0.90); prepare responses to same (1.60); e-mails with S. Nagano regarding objections to Japanese to English translations entered in Kondo deposition (0.40).	425.00	4.20	1,785.00	Billable
6/7/2016 211030	Nathan Cihlar WORK Review/draft and formulate final responses to objections to translations from Takeshima and Chung depositions (1.00); conferences regarding same with S. Kim-Helms (0.50).	550.00	1.50	825.00	Billable
6/9/2016 210973	Shinae Kim-Helms WORK Review and analyze Defendants' objections to translations entered as exhibits in Kondo deposition (1.00); review materials cited in said objection set (0.90); prepare responses to same (1.30).	425.00	3.20	1,360.00	Billable
6/9/2016 211084	Nathan Cihlar WORK Emails with V. Glaze and DPPs regarding request for extension of time for objections to translations by Hitachi and analyze strategy for response.	550.00	0.30	165.00	Billable
6/10/2016 210976	Shinae Kim-Helms WORK E-mails with A. Gooding regarding availability of competing translations of exhibits entered in Kondo depositions (0.30); review same (0.20).	425.00	0.50	212.50	Billable
6/14/2016 210986	Shinae Kim-Helms WORK Review and analyze Defendants objections to translations entered in Kondo depositions (1.30); review cited materials (0.90); prepare responses to said objections (1.60).	425.00	3.80	1,615.00	Billable
6/14/2016 211025	Carla Voigt WORK Finalize first two tabs of Tachihara objection set to include edits proposed by N. Cihlar (0.60); update draft of Takeshima objection set to include edits by N. Cihlar (0.40); update YW Chung objection set (0.40); route all three sets to N.Cihlar for further review (0.10).	300.00	1.50	450.00	Billable
6/15/2016 211032	Nathan Cihlar WORK Review, analyze and formulate final responses to Defendants' objections to translations entered in the Takeshima deposition.	550.00	2.00	1,100.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/20/2016 211033	Nathan Cihlar WORK Review, analyze and formulate final responses to Defendants' objections to translations entered in the Takeshima and Tahihara depositions.	550.00	4.00	2,200.00	Billable
6/21/2016 210949	Anna Gooding WORK Check dates of entered translations for translation objections per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
6/21/2016 210997	Shinae Kim-Helms WORK Receive and review Defendants objections to translations entered as exhibits in Sawai depositions (1.00); e-mails with A. Gooding regarding Sawai exhibits previously entered (0.20); review exhibits produced by SDI entered in Sawai exhibits (0.20); e-mail to N. Cihlar regarding same (0.10).	425.00	1.50	637.50	Billable
6/23/2016 211001	Shinae Kim-Helms WORK E-mails with A. Gooding regarding Defendants translations entered in briefs (0.20); review said translations for purpose of translation objections (0.30).	425.00	0.50	212.50	Billable
6/24/2016 211004	Shinae Kim-Helms WORK Review and analyze translated exhibits entered in Sawai depositions (0.90); cross-check against translation tracking chart (0.30); mark translations that Defendants untimely objected to (0.30).	425.00	1.50	637.50	Billable
6/27/2016 211007	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Kondo depositions (0.80); prepare responses to same (0.50); review draft responses to same prepared by DPPs and S. Nanago (0.50); revise and finalize same (0.50); review cited exhibits (0.30); research supporting materials for said responses (0.50); update chart organizing Defendants objections to Plaintiffs translated exhibits entered in Sawai depositions (0.60); assign Japanese portions to S. Nagano (0.20).	425.00	3.90	1,657.50	Billable
6/27/2016 211027	Carla Voigt WORK Confer with N. Cihlar regarding revisions to Plaintiffs' joint responses to Takeshima objections (0.30); incorporate revisions from N. Cihlar and finalize Takeshima objection set for circulation (1.00).	300.00	1.30	390.00	Billable
6/27/2016 211034	Nathan Cihlar WORK Review, analyze and formulate final responses to Defendants' objections to translations entered in the Tachihara deposition.	550.00	3.00	1,650.00	Billable
6/28/2016 211010	Shinae Kim-Helms WORK Review Defendants translated exhibits to Declaration of Frank Hogue in support of Defendants' Opposition to DPPs' motion for class cert for purpose of translation objections (1.80); e-mails with A. Gooding regarding same (0.40); review translated exhibits entered by DAPs and Defendants in depositions in May and June for errors (1.00); prepare summary of same (1.60); e-mails with N. Cihlar regarding same (0.40).	425.00	5.20	2,210.00	Billable
6/28/2016 211028	Carla Voigt WORK Draft status chart to track in flow and out flow of translation objections (0.60); complete review of Tachihara objection set and prepare for N. Cihlar's review of same (0.90).	300.00	1.50	450.00	Billable
6/28/2016 211035	Nathan Cihlar WORK Review issues from translated exhibits entered by DAPs in depositions from May, June and analyze impact and position re: objections to the same (0.80); discuss same with S. Kim-Helms (0.20).	550.00	1.00	550.00	Billable
6/29/2016 211013	Shinae Kim-Helms WORK Review translated exhibits to Defendants briefs in May and June for errors (1.20); prepare summary of same (1.60); e-mails with A. Gooding and N. Cihlar regarding same (0.40).	425.00	3.20	1,360.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/30/2016 211019	Shinae Kim-Helms WORK Review exhibit entered by Defendants without accompanying translation (0.50); determine need for translation of same (0.20); e-mails with N. Cihlar regarding same (0.10).	425.00	0.80	340.00	Billable
6/30/2016 211036	Nathan Cihlar WORK Review, revise, and strategic analysis of plaintiffs' first responses to defendants' objections to translations entered in the depositions of YW Chung and Tachihara depositions.	550.00	2.40	1,320.00	Billable
7/1/2016 211875	Nathan Cihlar WORK Review, revise and strategic analysis of plaintiffs' first responses to Defendants' objections to translations entered in the Tachihara deposition.	550.00	3.00	1,650.00	Billable
7/4/2016 211022	Shinae Kim-Helms WORK Review and analyze Defendants second responses regarding Plaintiffs translated exhibits entered in Fujimoto depositions (0.80); prepare Plaintiffs second responses to same (1.00); review cited materials (0.80); conduct research for supporting argument (0.90).	425.00	3.50	1,487.50	Billable
7/5/2016 211830	Shinae Kim-Helms WORK Receive and review Defendants second responses to Fukai and Kubo translation objections (0.50); combine same with internal notes (0.20); e-mails with V. Glaze regarding same (0.40); e-mails with S. Nagano regarding Plaintiffs argument supporting second responses (0.40); review and analyze Defendants second responses to Eguchi and Fujimoto translation objections (1.20); review cited materials (0.90); prepare Plaintiffs second responses to same (1.10).	425.00	4.70	1,997.50	Billable
7/6/2016 211833	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding Defendants exhibit containing foreign language entered in Hogue declaration without certified translation (0.80); continue to review and analyze Defendants second responses to Eguchi and Fujimoto translation objections (1.50); review cited materials (0.90); prepare Plaintiffs second responses to same (1.60).	425.00	4.80	2,040.00	Billable
7/6/2016 211864	Carla Voigt WORK Review, revise and edit plaintiffs' joint responses to translation objections to Tachihara exhibits per N. Cihlar notes (0.70); conferences regarding same (0.30).	300.00	1.00	300.00	Billable
7/6/2016 211876	Nathan Cihlar WORK Analysis of strategy for objections to translations from Defendants from Tachihara deposition (0.40); teleconference with S. Kim-Helms regarding assignments/coordination with DPPs (0.20); e-mails with S. Kim-Helms regarding translation issue from Hogue declaration (0.40).	550.00	1.00	550.00	Billable
7/7/2016 211836	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding Plaintiffs responses to Defendants objections to Tachihara exhibits (0.70); continue to review and analyze Defendants second responses to Eguchi and Fujimoto translation objections(2.20); review cited materials (0.90); prepare Plaintiffs second responses to same (2.00).	425.00	5.80	2,465.00	Billable
7/7/2016 211877	Nathan Cihlar WORK Strategic analysis and formulation of plaintiffs' first responses to defendants' objections to translations entered in the depositions of Tachihara deposition.	550.00	1.00	550.00	Billable
7/8/2016 211838	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Eguchi and Fujimoto translation objections (0.40); continue to review and analyze Defendants second responses to Eguchi and Fujimoto translation objections (0.40); review cited materials (0.60); prepare Plaintiffs second responses to same (0.80).	425.00	2.20	935.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/8/2016 211866	Carla Voigt WORK Teleconference with S. Kim-Helms regarding plaintiffs' first responses to Tachihara objections (0.40); review and revise same (0.30); finalize plaintiffs' responses to translation objections for Tachihara, Takeshima and YW Chung objections (0.30).	300.00	1.00	300.00	Billable
7/8/2016 211878	Nathan Cihlar WORK Finalize strategic analysis and formulation of draft table with responses to Defendants' objections to translations entered in the Tachihara and Takeshima depositions (2.80); meeting with C. Voigt regarding final edits to same (0.30); coordinate responses and finalize draft with DPPs (0.20); circulate to lead counsel of IPPs (0.10); review and edit master translation chart (0.10); discuss with S. Kim-Helms (0.20).	550.00	3.70	2,035.00	Billable
7/12/2016 211843	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding Plaintiffs responses to Defendants objections to translated exhibits entered in Tachihara (0.40); review Nakae deposition transcript (0.40); e-mails with N. Cihlar regarding master translation objection chart (0.40); e-mails with V. Glaze regarding sharing same in shared site (0.40); e-mails with N. Cihlar and V. Glaze regarding disputed translation objected by Defendants (0.40); review other sets of translation objections for related translations (0.90); prepare proposed revisions to draft responses to Defendants translation objections (1.00).	425.00	3.90	1,657.50	Billable
7/12/2016 211882	Nathan Cihlar WORK Emails with L. Chan regarding potential issues related to translations from the deposition of Tachihara and Nakae (0.50); analysis of duplicate translations, outstanding objections and response to Defendants regarding the same (0.70); e-mails with V. Glaze regarding coordination issues, outstanding objections (0.60).	550.00	1.80	990.00	Billable
7/13/2016 211868	Carla Voigt WORK Review email exchange with DPPs forwarded by N. Cihlar regarding revisions to plaintiffs' responses to objections to Tachihara translations (0.10); revise plaintiffs' responses to reflect same (0.40).	300.00	0.50	150.00	Billable
7/15/2016 211848	Shinae Kim-Helms WORK Review and analyze Defendants responses to Plaintiffs first responses to objections to translated exhibits entered in Fujimoto and Eguchi depositions (1.60); review cited materials (0.80); conduct research for allegations to support plaintiffs responses (0.40).	425.00	2.80	1,190.00	Billable
7/18/2016 211850	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding master translation objection chart (0.60); final review of Plaintiffs first responses to translated exhibits entered in Tachihara, Takeshima, and YW Chung depositions (1.20); serve Defendants same (0.20); update master translation objection chart accordingly (0.70); e-mail with A. Brown regarding Defendants objections to translated exhibits entered in Kondo and Tachihara depositions (0.40); provide requested materials (0.20); e-mails with N. Cihlar regarding same (0.60).	425.00	3.90	1,657.50	Billable
7/21/2016 211870	Carla Voigt WORK Review and revise plaintiffs' first responses to translation objections to Kondo exhibits.	300.00	4.00	1,200.00	Billable
7/21/2016 211879	Nathan Cihlar WORK Review objections to translations from Defendants from Shimizu deposition and manage assignments to obtain literal translations of same (0.40); teleconference with S. Kim-Helms regarding assignments/coordination with DPPs (0.10).	550.00	0.50	275.00	Billable
7/25/2016 211871	Carla Voigt WORK Review and revise plaintiffs' first responses to translation objections to Kondo exhibits to include edits by N. Cihlar (0.80); confer with N. Cihlar regarding same (0.20).	300.00	1.00	300.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/28/2016 211880	Nathan Cihlar WORK Review, analysis and strategy for various potential objection responses to translations from Kondo deposition (3.50); draft/edit table with responses to Defendants' objections to translations entered in the Kondo deposition (1.00).	550.00	4.50	2,475.00	Billable
7/29/2016 211881	Nathan Cihlar WORK Review, analyze and formulate strategy for various objection responses to translations from Kondo deposition (0.40); draft/edit table with responses to Defendants' objections to translations entered in the Kondo deposition (1.60).	550.00	2.00	1,100.00	Billable
8/1/2016 211862	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding status of translation objections and other related matters (0.30); e-mails with N. Cihlar and D. Lambrinos regarding recertified translations to be circulated (0.10); review said recertified translations (0.10).	425.00	0.50	212.50	Billable
8/1/2016 212362	Nathan Cihlar WORK Initial review of objections to translations from IS Jeon deposition and manage assignments for review of same (0.40); teleconference with S. Kim-Helms regarding same (0.10); coordinate with DPPs regarding responses (0.20).	550.00	0.70	385.00	Billable
8/2/2016 212312	Shinae Kim-Helms WORK E-mails with H. Rim regarding translation error contained in exhibit entered by DAPs in Jeon deposition (0.30); review said exhibits in comparison with original exhibit (0.30); analyze said translation accordingly (0.10); serve recertified version of translation entered in Tachihara to Defendants (0.10).	425.00	0.80	340.00	Billable
8/3/2016 212314	Shinae Kim-Helms WORK E-mails with C. Smith and V. Glaze regarding Defendants translation objections regarding IS Jeon exhibits.	425.00	0.20	85.00	Billable
8/4/2016 212316	Shinae Kim-Helms WORK Serve Defendants with additional recertified translations in which the Parties have resolved all outstanding translation objections (0.30); updated master translation objection chart (0.20).	425.00	0.50	212.50	Billable
8/5/2016 212318	Shinae Kim-Helms WORK Review and analyze Defendants second responses to translation objections regarding exhibits entered in Fujimoto and Eguchi depositions (0.80); review and revise Plaintiffs' second response to same (0.50); review cited materials (0.90); conduct searches for supporting arguments (0.30).	425.00	2.50	1,062.50	Billable
8/8/2016 212266	Anna Gooding WORK Pull exhibits for objection purposes per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
8/8/2016 212320	Shinae Kim-Helms WORK Review and analyze Defendants third responses to translation objections regarding exhibits entered with Plaintiffs opposition to Toshibas Summary Judgment Motion (0.30); review cited materials (0.30); conduct searches for supporting arguments (0.40); e-mails with S. Nagano regarding objections to Japanese to English translations (0.40); e-mails with H. Rim regarding status of translation objections to previously entered exhibits (0.40); teleconference with H. Rim regarding same (0.20); teleconference with N. Cihlar (0.20); update master translation objection chart (0.20); circulate same to H. Rim (0.20); e-mails with R. Noh and A. Gooding to compare exhibits entered multiple times (0.20); provide H. Rim with operative versions of exhibits (0.20).	425.00	3.00	1,275.00	Billable
8/9/2016 212322	Shinae Kim-Helms WORK Review and analyze Defendants third responses to translation objections regarding exhibits entered with Plaintiffs opposition to Toshibas Summary Judgment Motion (0.70); review cited materials (0.90); conduct searches for supporting arguments (0.50); e-mails with S. Nagano regarding	425.00	2.50	1,062.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	objections to Japanese to English translations (0.40).				
8/10/2016 212324	Shinae Kim-Helms WORK Review questions by C. Voigt to Plaintiffs draft responses to Defendants objections to translations entered in Kondo depositions (0.40); review cited exhibits and related materials (0.20); provide responses (0.10).	425.00	0.70	297.50	Billable
8/11/2016 212326	Shinae Kim-Helms WORK E-mails with H. Rim regarding translation objection process (0.20); e-mails with C. Voigt to Plaintiffs draft responses to Defendants objections to translations entered in Kondo depositions (0.30); review cited exhibits and related materials (0.10); provide responses (0.10).	425.00	0.70	297.50	Billable
8/16/2016 212332	Shinae Kim-Helms WORK Review and analyze Defendants third responses to translation objections regarding exhibits entered with Plaintiffs opposition to Toshibas Summary Judgment Motion (0.70); review cited materials (0.50); conduct searches for supporting arguments (0.50); e-mails with S. Nagano regarding objections to Japanese to English translations (0.50).	425.00	2.20	935.00	Billable
8/22/2016 212342	Shinae Kim-Helms WORK Briefly review Defendants objections to Plaintiffs translations entered in Nakae depositions (0.30); e-mails with K. Yamada regarding same (0.20).	425.00	0.50	212.50	Billable
8/24/2016 212347	Shinae Kim-Helms WORK E-mails with S. Nagano regarding outstanding responses to Defendants objections to translations entered in Fukai, Kubo, Shimizu, and Nakae depositions (0.70); e-mails with DPPs to split responses to prepare (0.30).	425.00	1.00	425.00	Billable
8/25/2016 212283	Anna Gooding WORK Pull deposition exhibits for objection purposes per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
8/25/2016 212353	Shinae Kim-Helms WORK Review and analyze Defendants third responses to Plaintiffs objections to translations entered in connection with Toshibas summary judgment motion (1.00); prepare draft third responses (0.80); review cited materials (0.90); conduct research on supporting argument (0.50).	425.00	3.20	1,360.00	Billable
8/26/2016 212354	Shinae Kim-Helms WORK Review and analyze Defendants third responses to Plaintiffs objections to translations entered in connection with Toshibas summary judgment motion (1.60); prepare draft third responses (0.50); review cited materials (0.90); conduct research on supporting argument (0.40); review and analyze Defendants objections to Plaintiffs translations entered in connection with Class Certification Brief and Experts reports (1.40); analyze exhibits and determine operative versions of translations (1.60); e-mails with R. Noh regarding same (0.40); e-mails with K. Yamada and V. Glaze regarding outstanding translation objections (0.40).	425.00	7.20	3,060.00	Billable
8/26/2016 212363	Nathan Cihlar WORK Initial review of objections to translations from Masunaga deposition and manage assignments for review of same (0.30); teleconference with S. Kim-Helms regarding same (0.10); coordinate with DPPs regarding responses (0.10).	550.00	0.50	275.00	Billable
8/29/2016 212364	Nathan Cihlar WORK Review, analyze and revise plaintiffs' final formulation of responses to Defendants' objections to translations entered in the Kondo deposition.	550.00	3.00	1,650.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/30/2016 212311	Richard Noh WORK Assist S. Kim-Helms with translation objections (1.00); prepare foreign documents for translation; email correspondence with translation company regarding the same (0.50).	155.00	1.50	232.50	Billable
8/30/2016 212356	Shinae Kim-Helms WORK [redacted] (1.60); teleconference with A. Gooding regarding missing exhibits filed by IPPs and DPPs in connection with Class Cert Brief that have been objected to by Defendants (0.50); review and analyze Defendants objections to Plaintiffs translated exhibits submitted in connection with Class Certification Brief and Experts reports (1.60); prepare and draft responses to same (1.60); [redacted] and coordinate strategy with DPPs (0.60); e-mails with C. Smith and K. Yamada regarding same (0.40); teleconference with R. Noh regarding status of different versions of translations entered into record (0.50).	425.00	6.80	2,890.00	Billable
8/31/2016 212359	Shinae Kim-Helms WORK Review Defendants objections to Plaintiffs translated exhibits entered in Nakae depositions per L. Chans request (0.50); e-mails with L. Chan, N. Cihlar and S. Nagano regarding same (0.40); e- mails with C. Smith regarding Defendants objections to translations submitted in connection with Class Certification Brief and Experts reports (0.40); review materials cited in said objections (0.80); prepare responses to Defendants said objections (1.00).	425.00	3.10	1,317.50	Billable
8/31/2016 215402	Anna Gooding WORK Pull exhibits for objection purposes.	155.00	1.00	155.00	Billable
9/1/2016 212599	Shinae Kim-Helms WORK E-mails with C. Smith and K. Yamada regarding Defendants objections to Plaintiffs translations submitted in connection with Class Certification Brief and Experts reports (0.40); review and analyze Defendants objections to Plaintiffs translated exhibits submitted in connection with Class Certification Brief and Experts reports (1.60); prepare and draft responses to same (1.20); e-mails with S. Nagano regarding Defendants objections to translated exhibits entered in Nakae depositions (0.40); review and revise Plaintiffs responses to same accordingly (1.10); e-mails with L. Chan regarding same (0.40).	425.00	5.10	2,167.50	Billable
9/2/2016 212365	Nathan Cihlar WORK Review, analyze and draft plaintiffs' final formulation of responses to Defendants' objections to translations entered in the Kondo deposition.	550.00	2.50	1,375.00	Billable
9/5/2016 212594	Nathan Cihlar WORK Review, analyze and draft plaintiffs' final formulation of responses to Defendants' objections to translations entered in the Kondo deposition.	550.00	3.00	1,650.00	Billable
9/7/2016 212595	Nathan Cihlar WORK Review, analyze and draft plaintiffs' final formulation of responses to Defendants' objections to translations entered in the Kondo deposition (2.80); analysis and coordination with DPPs regarding objections to translations from John Oh deposition (0.20).	550.00	3.00	1,650.00	Billable
9/7/2016 212611	Shinae Kim-Helms WORK E-mails with V. Glaze regarding missing exhibits submitted along with expert reports (0.30); review and analyze Defendants objections to Plaintiffs translated exhibits submitted along with Class Cert Brief and Expert Reports (1.00); review cited materials (0.40); draft Plaintiffs responses (0.40).	425.00	2.10	892.50	Billable
9/7/2016 215420	Richard Noh WORK Assist S. Kim-Helms with translation objections.	155.00	0.50	77.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/8/2016 212578	Carla Voigt WORK Revise and format plaintiffs joint responses to objections to translations entered in the Kondo deposition incorporating edits from N. Cihlar (0.40); route finalized sets to N. Cihlar (0.10).	300.00	0.50	150.00	Billable
9/8/2016 212596	Nathan Cihlar WORK Finalize draft first responses to Defendants' objections to translations entered in the Kondo deposition (1.00); circulate and coordinate with V. Glaze of DPPs (0.10); circulate to IPP lead counsel for final edits (0.10).	550.00	1.20	660.00	Billable
9/9/2016 212614	Shinae Kim-Helms WORK E-mails with C. Smith and V. Glaze regarding Defendants translation objections with outstanding responses (0.40); e-mails with S. Nagano regarding missing exhibits submitted with Expert Reports (0.40); review and analyze Defendants objections to Plaintiffs translated exhibits submitted along with Class Cert Brief and Expert Reports (0.90); review cited materials (0.90); draft Plaintiffs responses (1.60).	425.00	4.20	1,785.00	Billable
9/12/2016 212621	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted along with Class Cert Brief and Expert Reports (0.50); review cited materials (0.30); draft Plaintiffs responses (0.30).	425.00	1.10	467.50	Billable
9/12/2016 212674	Richard Noh WORK Email correspondence with translation company regarding revisions to translation (0.20); assist S. Kim-Helms with translation objections (1.00); prepare translation for correction (0.50); email correspondence with translation company regarding the same (0.30).	155.00	2.00	310.00	Billable
9/13/2016 212622	Shinae Kim-Helms WORK E-mails with V. Glaze regarding Kondo translation objections (0.20); teleconference with N. Cihlar regarding same (0.10).	425.00	0.30	127.50	Billable
9/14/2016 212628	Shinae Kim-Helms WORK Review Plaintiffs joint responses to Defendants objections to translated exhibits entered in Kondo depositions (1.70); e-mails with N. Cihlar regarding untimely objections (0.50); revise and review said responses (0.40); e-mails with R. Noh regarding same (0.30); circulate same to Defendants (0.20).	425.00	3.10	1,317.50	Billable
9/15/2016 212631	Shinae Kim-Helms WORK E-mails with A. Gooding regarding Kondo exhibits (0.40); review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and Expert Reports (0.70); prepare draft responses (0.50); review cited materials (0.40).	425.00	2.00	850.00	Billable
9/15/2016 215403	Anna Gooding WORK Compare exhibits for objection related purposes per request of S. Kim-Helms.	155.00	0.20	31.00	Billable
9/16/2016 212634	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and Expert Reports (0.50); prepare draft responses (0.50); review cited materials (0.50); conduct research for supporting argument (0.50).	425.00	2.00	850.00	Billable
9/19/2016 212637	Shinae Kim-Helms WORK E-mails with H. Rim and V. Glaze regarding missing exhibits submitted with Class Cert Brief and Expert Reports that are cited to in Defendants objections to Plaintiffs translated exhibits submitted therewith (0.60); review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and Expert Reports (1.00); prepare draft responses; (0.80) review cited materials (0.90); conduct research for supporting argument (0.40).	425.00	3.70	1,572.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/20/2016 212642	Shinae Kim-Helms WORK E-mails with K. Yamada regarding Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and expert reports (0.50); review and analyze said objections (1.00); review cited materials (0.30); prepare draft responses to same (0.30).	425.00	2.10	892.50	Billable
9/28/2016 212580	Carla Voigt WORK Confer with N. Cihlar regarding translation objection responses for Toshiba SJM, Fujitomo and Eguchi (0.30); route draft responses to N. Cihlar for review (0.10).	300.00	0.40	120.00	Billable
9/28/2016 212597	Nathan Cihlar WORK Review, analyze and draft plaintiffs' final formulation of second responses to Defendants' objections to translations entered in the Eguchi and Fujitomo depositions.	550.00	3.50	1,925.00	Billable
9/29/2016 212663	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and expert reports (0.80); review cited materials (0.30); conduct research on supporting arguments (0.20); prepare draft responses to same (0.20).	425.00	1.50	637.50	Billable
9/30/2016 212598	Nathan Cihlar WORK Review, analyze and draft plaintiffs' final formulation of second responses to Defendants' objections to translations entered in the Eguchi and Fujitomo depositions (1.00).	550.00	1.00	550.00	Billable
9/30/2016 212665	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and expert reports (0.60); review cited materials (0.30); conduct research on supporting arguments (0.20); prepare draft responses to same (0.10).	425.00	1.20	510.00	Billable
10/4/2016 213091	Nathan Cihlar WORK Draft, analyze plaintiffs' second responses to Defendants' objections to translations entered in the Fujitomo deposition (4.20); teleconference with S. Kim-Helms regarding same (0.30).	550.00	4.50	2,475.00	Billable
10/4/2016 213096	Shinae Kim-Helms WORK Review and analyze issues identified by N. Cihlar in Plaintiffs draft responses to Defendants objections to translated exhibits entered and Eguchi and Fujimoto depositions (0.50); confer with N. Cihlar regarding status of draft responses o Defendants translation objections (0.50).	425.00	1.00	425.00	Billable
10/4/2016 215421	Richard Noh WORK Assist S. Kim-Helms with translation objections.	155.00	1.00	155.00	Billable
10/5/2016 213092	Nathan Cihlar WORK Revise, edits and strategic analysis for second response to Defs' objections to translations entered in Fujitomo deposition (0.80); emails with V. Glaze and DPPs regarding same (0.20); emails with IPP lead counsel regarding spreadsheet to circulate to Defendants (0.20).	550.00	1.20	660.00	Billable
10/5/2016 213099	Shinae Kim-Helms WORK Review finalized Plaintiffs responses to Defendants objections to translated exhibits entered in Fujimoto and Eguchi depositions (0.30); select translations eligible for re-certifications (0.20); e-mails with R. Noh to request re-certified translations to Consortra (0.30); confer with N. Cihlar regarding same (0.20).	425.00	1.00	425.00	Billable
10/6/2016 213101	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of outstanding translation objections (0.60); review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert Brief and Expert reports (0.70); review cited materials (0.90); draft proposed responses to same (0.50).	425.00	2.70	1,147.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/7/2016 213093	Nathan Cihlar WORK Review, analyze and final formulation of plaintiffs' second responses to Defendants' objections to translations entered in the Fujitomo deposition (1.90); email correspondences with V. Glaze regarding same (0.20).	550.00	2.10	1,155.00	Billable
10/12/2016 213106	Shinae Kim-Helms WORK Review finalized Plaintiffs' joint second responses to Defendants' objections to the translations entered in the depositions of Hisashi Fujitomo and Daiichiro Eguchi (0.90); e-mail said responses and recertified translation to Defendants translation liaison (0.40); update master translation objection chart (0.20); circulate same to DPPs and N. Cihlar (0.20); e-mails with N. Cihlar regarding status of outstanding responses to Defendants translation objections (0.40).	425.00	2.10	892.50	Billable
10/13/2016 213108	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted with Class Cert brief and expert reports (1.00); review cited materials (0.30); conduct research for supporting arguments (0.30); draft responses to said objections (0.50).	425.00	2.10	892.50	Billable
10/19/2016 213115	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted along with Class Cert Brief and Expert Reports (1.00); review cited materials (0.30); conduct research on supporting argument (0.70); draft responses to said objections (0.50).	425.00	2.50	1,062.50	Billable
10/21/2016 213119	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits submitted along with Class Cert Brief and Expert Reports (1.00); review cited materials (0.30); conduct research on supporting argument (0.50); draft responses to said objections (0.40); e-mails with H. Rim and L. Chan regarding operative versions of translations previously entered into record (0.30); review Defendants objections to Plaintiffs translated exhibits entered during Sawai depositions (0.30); e-mails with V. Glaze and K. Yamada regarding same (0.30).	425.00	3.10	1,317.50	Billable
10/24/2016 213122	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Defendants objections to plaintiffs translated exhibits entered in Nakae depositions.	425.00	0.40	170.00	Billable
10/25/2016 213123	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Sawai depositions (0.50); review cited materials (0.50); prepare draft proposed responses to same (0.50).	425.00	1.50	637.50	Billable
10/26/2016 213126	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Shimizu depositions (0.50); review cited materials (0.50); prepare draft proposed responses to same (0.50).	425.00	1.50	637.50	Billable
10/27/2016 213128	Shinae Kim-Helms WORK Receive Defendants objections to plaintiffs translated exhibits entered in Terado depositions (0.30); e-mails with N. Cihlar regarding same (0.10); coordinate strategy with DPPs and S. Nagano for draft responses (0.10).	425.00	0.50	212.50	Billable
10/27/2016 213137	Carla Voigt WORK Meeting with N. Cihlar regarding objections to translations entered as exhibits to the IPP/DPP motion for class certification (0.90); review and revise plaintiffs' joint responses to objections to translations entered as exhibits to the IPP/DPP Motion for Class Certification per N. Cihlar (1.00); route first few hundred rows to N. Cihlar for review (0.10).	300.00	2.00	600.00	Billable
10/28/2016 213018	Richard Noh WORK Update master translation tracking list with recent translation objections.	155.00	3.00	465.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/28/2016 213094	Nathan Cihlar WORK Draft, revise plaintiffs' joint responses to objections to translations entered as exhibits to the IPP/DPP Motion for Class Certification (6.10); teleconference with S. Kim-Helms regarding changes to translation tracking chart (0.40).	550.00	6.50	3,575.00	Billable
10/31/2016 213095	Nathan Cihlar WORK Review, revision, and final formation of plaintiffs' joint responses to objections to translations entered as exhibits to the IPP/DPP Motion for Class Certification.	550.00	2.50	1,375.00	Billable
10/31/2016 213138	Carla Voigt WORK Review and revise plaintiffs' joint responses to objections to translations entered as exhibits to the IPP/DPP Motion for Class Certification (1.20); confer with N. Cihlar regarding changes to translation tracking charts (0.30).	300.00	1.50	450.00	Billable
11/2/2016 213461	Shinae Kim-Helms WORK Review and analysis of Defendants objections to translations entered in Nakae exhibit per L. Chan (0.30); review and revise Plaintiffs draft responses to same (0.20); review Defendants version of translation (0.20).	425.00	0.70	297.50	Billable
11/3/2016 213465	Shinae Kim-Helms WORK Review Defendants responses to Plaintiffs proposed changes to translation entered in Nakae exhibit (0.50); review foreign original document (0.30); conduct research for supporting arguments (0.20); draft responses to said Defendants responses (0.20).	425.00	1.20	510.00	Billable
11/4/2016 213469	Shinae Kim-Helms WORK Review and analysis of Defendants responses to Plaintiffs proposed changes to translation entered in Nakae exhibit (0.30); review foreign original document (0.30); draft responses to said Defendants responses (0.30); teleconference with N. Cihlar to discuss same (0.30); forward draft responses to L. Chan (0.30).	425.00	1.50	637.50	Billable
11/4/2016 213595	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding responses to objections to translations from Nakae deposition (0.10); analysis and draft responses to same (0.40).	550.00	0.50	275.00	Billable
11/8/2016 213481	Shinae Kim-Helms WORK Receive and review Defendants responses to translation in exhibit entered in Nakae deposition (0.30); develop proposed compromise translations and arguments supporting said compromise translations with N. Cihlar (0.30); teleconference with N. Cihlar regarding same (0.30); teleconference with S. Nagano to discuss translation objection related issues (0.30); e-mail said draft compromise translations and arguments to L. Chan (0.30).	425.00	1.50	637.50	Billable
11/8/2016 213593	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding responses to objections and formation of unified responses (0.20); draft proposed compromise responses to Nakae translation objections with S. Kim-Helms (0.60).	550.00	0.80	440.00	Billable
11/10/2016 213485	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Shimizu depositions (0.60); review cited materials (0.90); conduct research on supporting arguments (0.30); review and revise DPPs and S. Naganos draft responses to same (1.00); e-mails with A. Gooding/E. Miorin regarding previously entered exhibits (0.40); draft responses to said objections (1.00).	425.00	4.20	1,785.00	Billable
11/11/2016 213489	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Shimizu depositions (0.60); review cited materials (0.40); conduct research on supporting arguments (0.40); review and revise DPPs and S. Naganos draft responses to same (0.40); draft responses to said	425.00	2.20	935.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	objections (0.40).				
11/14/2016 213497	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Shimizu depositions (0.50); review cited materials (0.30); conduct research on supporting arguments (0.30); review and revise DPPs and S. Naganos draft responses to same (0.30); confer with N. Cihlar regarding replacing existing exhibits objected to by Defendants (0.30); draft responses to said objections (0.30).	425.00	2.00	850.00	Billable
11/15/2016 213501	Shinae Kim-Helms WORK Teleconference with N. Cihlar to discuss untimely objections to Defendants translation objections regarding Class Cert and Expert Report exhibits (0.30); review email correspondences between co-counsel and defense counsel regarding due date for said objections (0.20).	425.00	0.50	212.50	Billable
11/15/2016 213550	Carla Voigt WORK Confer with N. Cihlar regarding edits to joint responses to IPP/DPP class cert translation objections (0.70); review and revise responses (1.20); teleconference with S. Kim-Helms regarding timeliness issues in this objection set (0.50); review emails from S. Kim-Helms regarding agreements with the Defendants regarding timeframe for objections to class cert exhibits (1.10); confirm dates on certified translations and dates translations were first entered into the record; create chart of same (2.00).	300.00	5.50	1,650.00	Billable
11/15/2016 213596	Nathan Cihlar WORK Draft, revise and finalize responses to objections to translations from IPP/DPP class cert (1.90); meeting with C. Voigt regarding responses and analysis (0.40); discuss timeline concerns with S. Kim-Helms and C. Voigt (0.20).	550.00	2.50	1,375.00	Billable
11/16/2016 213502	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in Shimizu depositions (0.30); review cited materials (0.30); conduct research on supporting arguments (0.30); review and revise DPPs and S. Naganos draft responses to same (0.30); develop responses to said objections and circulate proposed draft responses to N. Cihlar (0.30).	425.00	1.50	637.50	Billable
11/17/2016 213505	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in IS Jeon depositions (0.50); review cited materials (0.60); conduct research on supporting arguments (0.30); review and revise DPPs and S. Naganos draft responses to same (0.30); draft responses to said objections (0.30); e-mails with E. Miorin regarding status of said exhibits and operative versions thereof (0.30).	425.00	2.30	977.50	Billable
11/17/2016 213551	Carla Voigt WORK Review and revise certain responses to objections to translations per N. Cihlar entered with the IPP/DPP class cert brief (0.90); review translations and confirm bates numbers and dates certain translations were first entered into the record (0.50); compare conflicting translations of same bates numbers; begin drafting responses for objections where plaintiffs entered conflicting translations (1.00); email E. O'Donnell regarding locating appellate opening briefs (0.10).	300.00	2.50	750.00	Billable
11/17/2016 213597	Nathan Cihlar WORK Draft and revise responses to objections to translations from various objections raised to IPP/DPP class cert and supporting documents and draft unified responses (1.30); discuss same with C. Voigt and incorporate into response chart (0.70).	550.00	2.00	1,100.00	Billable
11/18/2016 213509	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translated exhibits entered in IS Jeon depositions (0.20); review cited materials (0.20); conduct research on supporting arguments (0.20); review and revise DPPs and S. Naganos draft responses to same (0.20); e-mails with E. Miorin regarding status of said exhibits and operative versions thereof (0.20).	425.00	1.00	425.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/30/2016 213530	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in IS Jeon depositions (0.60); review cited materials (0.70); draft responses to same (0.70).	425.00	2.00	850.00	Billable
12/1/2016 213534	Shinae Kim-Helms WORK Teleconference with L. Chan regarding translation objection process.	425.00	0.40	170.00	Billable
12/2/2016 214154	Carla Voigt WORK Draft responses to each objection in which two different translations have been entered for the same bates numbers in the IPP/DPP class cert objection set per N. Cihlar proposed language for responses.	300.00	3.00	900.00	Billable
12/2/2016 214217	Nathan Cihlar WORK Analysis of class certified objection to translations and compare/ contrast documents with multiple translations (1.00); draft proposed unified responses to documents with multiple translations based on protocol (1.50).	550.00	2.50	1,375.00	Billable
12/8/2016 214159	Carla Voigt WORK Review email exchanges between S. Kim-Helms and S. Nagano regarding translations of certain names in the IPP/DPP class cert objections set; discuss with S. Kim-Helms (0.20); revise Plaintiffs' joint responses accordingly (0.30).	300.00	0.50	150.00	Billable
12/8/2016 214195	Shinae Kim-Helms WORK E-mails with S. Nagano regarding Responses to Defendants objections to translations submitted with IPP/DPP Class Cert (0.60); review cited materials and objections thereto (0.20).	425.00	0.80	340.00	Billable
12/12/2016 214164	Carla Voigt WORK Confer with N. Cihlar regarding situation in which different translations have been entered for the same bates numbers (1.20); update internal tracking chart regarding same to reflect approach and response (0.80).	300.00	2.00	600.00	Billable
12/12/2016 214198	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in IS Jeon depositions (1.00); review cited materials (0.30); draft proposed literal translation responses to the same (0.70).	425.00	2.00	850.00	Billable
12/12/2016 214218	Nathan Cihlar WORK Review and revise IS Jeon responses to translation objections (0.70); analysis of sentences with multiple translations of same documents and draft unified responses to same (0.50); teleconference with S. Kim-Helms regarding approach to same (0.20).	550.00	1.40	770.00	Billable
12/26/2016 214211	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai depositions (1.50); review cited materials (1.00); draft proposed literal translation responses to the same (1.00).	425.00	3.50	1,487.50	Billable
1/6/2017 214569	Nathan Cihlar WORK Analyze, draft, review and formulate plaintiffs' joint responses to IPP/DPP class cert translation objections.	550.00	5.30	2,915.00	Billable
1/6/2017 214604	Carla Voigt WORK Review and incorporate N. Cihlar's additional edits into the plaintiffs' joint responses to IPP/DPP class cert translation objections (1.00); confer with N. Cihlar regarding conflicting translations entered into the record and responses to objections related to the same (0.50); email S. Kim-Helms regarding same with instructions for future responses to similar objections (0.50).	300.00	2.00	600.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/9/2017 214570	Nathan Cihlar WORK Review, analysis and formulate plaintiffs' joint responses to IPP/DPP class cert translation objections (2.00); confer with S.Kim-Helms regarding conflicting translations entered into the record and responses to objections related to the same (1.00).	550.00	3.00	1,650.00	Billable
1/9/2017 214605	Carla Voigt WORK Follow-up with S. Kim-Helms regarding Rushing Exhibit 32 and Williams Exhibit 64 translation overlap and analysis of same (0.60); teleconference with S. Kim-Helms regarding same (0.20).	300.00	0.80	240.00	Billable
1/9/2017 215404	Anna Gooding WORK Pull documents for objection-related purposes per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
1/10/2017 214566	Nathan Cihlar WORK Analyze, draft, review and formulate plaintiffs' joint responses to IPP/DPP class cert translation objections (4.50); confer with S.Kim-Helms regarding conflicting translations entered into the record and responses to objections related to the same (0.70).	550.00	5.20	2,860.00	Billable
1/11/2017 214519	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai deposition (1.20); review and analyze cited materials (0.80); review and revise draft responses to said objections prepared by S. Nagano (0.80); conduct research for supporting arguments (0.80); teleconference with N. Cihlar regarding same (0.50).	425.00	4.10	1,742.50	Billable
1/11/2017 214568	Nathan Cihlar WORK Finalize draft of the plaintiffs' joint responses to IPP/DPP class cert translation objections (3.0); emails with V. Glaze regarding proposed suggested edits to the same (0.30); emails with IPP lead counsel regarding this set of responses (0.20); teleconference with S. Kim-Helms regarding responses to objections from Sawai deposition (0.40).	550.00	3.90	2,145.00	Billable
1/11/2017 214607	Carla Voigt WORK Review Defendants' objection related to operative version of SDI-B-000004904 in IPP/DPP class cert translation objection set (0.20); compare and contrast two conflicting translations of same and determine whether to accept more inclusive translation as operative (0.50); review deposition transcripts involving same (0.20); update translation objection responses to reflect same and route to N. Cihlar (0.10).	300.00	1.00	300.00	Billable
1/18/2017 214535	Shinae Kim-Helms WORK E-mails with DAPs counsel regarding status of outstanding translation objections (0.40); teleconference with N. Cihlar regarding same (0.30).	425.00	0.70	297.50	Billable
1/18/2017 214616	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding management of issues with DAPs on translations.	550.00	0.30	165.00	Billable
1/19/2017 214536	Shinae Kim-Helms WORK E-mails with H. Rim regarding Defendants translation objections to Tachihara exhibit.	425.00	0.40	170.00	Billable
1/23/2017 214548	Shinae Kim-Helms WORK Update Master Translation Tracking Chart to include final responses to objections to translations from IPP class cert (0.50); serve the Joint first responses to objections to exhibits from class cert on Defendants per N. Cihlar (0.50); prepare list of translations to be recertified (0.40); e-mails with N. Cihlar regarding translations to be recertified (0.40); e-mail recertification instructions to A. Gooding and E. Miorin (0.40).	425.00	2.20	935.00	Billable
1/23/2017 214617	Nathan Cihlar WORK Email exchange with V. Glaze, DPP counsel, regarding finalization of first responses of IPP/DPP to	550.00	0.70	385.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	objections to IPP class cert translations (0.20); final edits to same before circulation to Defendants (0.50).				
1/24/2017 214552	Shinae Kim-Helms WORK Review draft e-mail and attachments to Consortra with instructions to recertify seven resolved translations, prepared by A. Gooding (0.30); e-mails with A. Gooding regarding same (0.20).	425.00	0.50	212.50	Billable
1/24/2017 215405	Anna Gooding WORK Prepare certified translations for recertification.	155.00	3.00	465.00	Billable
1/26/2017 215456	Shinae Kim-Helms WORK Review recertified translations to be finalized (1.20).	425.00	1.20	510.00	Billable
1/27/2017 215406	Anna Gooding WORK Check recertified translations for accuracy.	155.00	1.40	217.00	Billable
1/31/2017 214586	Anna Gooding WORK Format re-certifications (0.30); help S. Kim-Helms with objection-related materials (0.70).	155.00	1.00	155.00	Billable
1/31/2017 214615	Shinae Kim-Helms WORK E-mails with A. Gooding regarding recertified translations (0.50); prepare recertified version of informal translations (1.00); serve Defendants with translations resolved in Plaintiffs joint responses dated January 23 (0.50).	425.00	2.00	850.00	Billable
2/1/2017 214834	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai depositions (0.50); analyze cited materials(1.00); conduct research for supporting arguments (0.50); draft responses to said objections (0.50).	425.00	2.50	1,062.50	Billable
2/1/2017 214959	Nathan Cihlar WORK Analyze, draft, review and formulate plaintiffs' joint responses to Shimuzu and Jeon objections to translations (6.00); confer with S.Kim-Helms regarding conflicting translations entered into the record and responses to objections related to the same (1.00).	550.00	7.00	3,850.00	Billable
2/2/2017 214838	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai depositions (0.50); analyze cited materials (0.80); conduct research for supporting arguments (0.50); draft responses to said objections (0.50).	425.00	2.30	977.50	Billable
2/2/2017 214960	Nathan Cihlar WORK Finalize draft of the plaintiffs' joint joint responses to Shimuzu and Jeon objections to translations (2.20); meetings with C. Voigt regarding incorporations and edits to the spreadsheet (0.80); emails with V. Glaze of DPPs regarding proposed suggested edits to the same (0.40); emails with IPP lead counsel regarding this set of responses (0.20).	550.00	3.60	1,980.00	Billable
2/2/2017 214963	Carla Voigt WORK Discuss draft responses to defendants objections to translations entered in the Shimizu and IS Jeon depositions with N. Cihlar and resolve various issues related to same (0.80); review and revise draft responses per N. Cihlar's revisions (2.50).	300.00	3.30	990.00	Billable
2/3/2017 214841	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai depositions (0.40); analyze cited materials (0.40); conduct research for supporting arguments (0.40); draft responses to said objections (0.30).	425.00	1.50	637.50	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/6/2017 214845	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered in Sawai depositions (0.40); analyze cited materials (0.40); conduct research for supporting arguments (0.40); draft responses to said objections (0.30).	425.00	1.50	637.50	Billable
2/7/2017 214849	Shinae Kim-Helms WORK Review and analyze Defendants objections to Plaintiffs translations entered at Sawai depositions (1.00); review cited materials (0.30); draft responses to same (0.70); e-mails with S. Nagano regarding translation of objected to terms (0.30).	425.00	2.30	977.50	Billable
2/10/2017 214854	Shinae Kim-Helms WORK Review draft of Plaintiffs responses to Defendants objections to translations marked at Shimizu deposition (0.90); teleconference with N. Cihlar regarding edits to the same (0.40); revise draft (0.90).	425.00	2.20	935.00	Billable
2/10/2017 214961	Nathan Cihlar WORK E-mails with V. Glaze regarding edits to the IPP/DPP plaintiffs' joint responses to Shimuzu and Jeon objections to translations (0.20); analysis and edits of the remaining conflicts of translations (1.00); confer with S.Kim-Helms regarding consistent responses due to multiple translations of same document and responses to overlapping objections (0.70).	550.00	1.90	1,045.00	Billable
2/13/2017 214860	Shinae Kim-Helms WORK E-mails with V. Glaze regarding finalized Plaintiffs responses to Defendants objections to translations marked at Shimizu deposition (0.40); finalize Plaintiffs responses to Defendants objections to translations marked at Shimizu and JJ Joe depositions per N. Cihlar suggestions (0.40); serve same to Defendants (0.40); update master translation tracking chart accordingly (0.40); e-mails with A. Brown regarding Defendants objections to Plaintiffs translations entered in Goto depositions (0.20).	425.00	1.80	765.00	Billable
2/13/2017 214906	Anna Gooding WORK Convert objection chart from PDF to Excel (1.30); pull objected-to exhibits per request of S. Kim-Helms (0.40).	155.00	1.70	263.50	Billable
2/13/2017 215391	Elizabeth Miorin WORK File translation objections (0.60).	155.00	0.60	93.00	Billable
2/16/2017 214870	Shinae Kim-Helms WORK Review and analyze Defendants second responses regarding Kubo and Fukai exhibits (0.40); review and revise DPPs draft responses to said objections (0.60); e-mails with V. Glaze and K. Yamada regarding same (0.30).	425.00	1.30	552.50	Billable
2/16/2017 214962	Nathan Cihlar WORK Review of Defendants second responses to objections to Plaintiffs translations entered in Kubo and Fukai depositions and manage responses to the same (0.60); teleconference with S. Kim-Helms regarding consistency and responses (0.40).	550.00	1.00	550.00	Billable
2/23/2017 214885	Shinae Kim-Helms WORK Review and analyze Defendants second responses to objections to Plaintiffs translations entered in Kubo and Fukai depositions (1.00); teleconference with N. Cihlar regarding strategy per the same (0.30); review and revise draft second responses by DPPs and S. Nagano (0.30); e-mails with S. Nagano regarding same (0.50); conduct research for support argument (0.50).	425.00	2.60	1,105.00	Billable
2/24/2017 214889	Shinae Kim-Helms WORK Review and analyze Defendants second responses to objections to Plaintiffs translations entered in Kubo and Fukai depositions (1.00); review and revise draft second responses by DPPs and S. Nagano (0.50); conduct research for support argument (0.50).	425.00	2.00	850.00	Billable

244/Ion Batteries(3): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/27/2017 214891	Shinae Kim-Helms WORK Review and analyze Defendants second responses to objections to Plaintiffs translations entered in Kubo and Fukai depositions (0.50); review and revise draft second responses by DPPs and S. Nagano (0.50); conduct research for support argument (0.50); e-mails with DPPs to discuss strategy of responses (0.30).	425.00	1.80	765.00	Billable
2/28/2017 214942	Shinae Kim-Helms WORK Teleconference with C. Voigt regarding status of outstanding responses to Defendants translation objections (0.50); finalize Plaintiffs responses to Defendants objections to translation entered in Kubo and Fukai depositions (0.70); review Defendants objections to plaintiffs translations to JJ Joe (1.10); e-mail to A. Gooding to evaluate said exhibits to select operative versions (0.40); e-mails with C. Smith regarding same (0.40).	425.00	3.10	1,317.50	Billable
Total: WORK			922.60		$399,948.50
TOTAL	Billable Fees		922.60		$399,948.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$399,948.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$399,948.50
Total New Balance		$399,948.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	155.00	12.80	$1,984.00	$1,984.00	0.00
AG	145.00	3.00	$435.00	$435.00	0.00
CL	425.00	1.70	$722.50	$722.50	0.00
CL	350.00	2.80	$980.00	$980.00	0.00
CV	300.00	58.00	$17,400.00	$17,400.00	0.00
CV	275.00	63.10	$17,352.50	$17,352.50	0.00
EM	155.00	0.60	$93.00	$93.00	0.00
NC	550.00	274.10	$150,755.00	$150,755.00	0.00
RN	155.00	17.50	$2,712.50	$2,712.50	0.00
RN	145.00	1.40	$203.00	$203.00	0.00
SK	425.00	486.80	$206,890.00	$206,890.00	0.00
TDB	695.00	0.30	$208.50	$208.50	0.00
TMP	425.00	0.50	$212.50	$212.50	0.00

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Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Activity: WORK					
12/1/2015 208107	Carla Voigt WORK Review email from S. Sklaver regarding upcoming class rep depositions (0.10); conference with N. Cihlar regarding same [redacted] (0.10).	275.00	0.20	55.00	Billable
12/2/2015 208090	Nathan Cihlar WORK Teleconference [redacted]	550.00	0.20	110.00	Billable
12/2/2015 209780	Timothy D. Battin WORK Exchange emails with S. Sklaver and C. Voigt regarding class rep depos and prep.	725.00	0.20	145.00	Billable
12/3/2015 208108	Carla Voigt WORK Email exchanges [redacted]	275.00	0.50	137.50	Billable
12/4/2015 208109	Carla Voigt WORK Email exchange [redacted] (0.30); emails with N. Cihlar regarding same (0.10); email [redacted] (0.10).	275.00	0.50	137.50	Billable
12/7/2015 208110	Carla Voigt WORK Review email [redacted] (0.20); email exchange [redacted] (0.30).	275.00	0.50	137.50	Billable
12/8/2015 208111	Carla Voigt WORK Email exchange [redacted]	275.00	0.20	55.00	Billable
12/11/2015 208112	Carla Voigt WORK Email exchanges [redacted]	275.00	0.50	137.50	Billable
12/14/2015 208113	Carla Voigt WORK Email exchanges and teleconferences [redacted]	275.00	0.30	82.50	Billable
12/15/2015 208114	Carla Voigt WORK [redacted]	275.00	0.20	55.00	Billable
12/16/2015 208115	Carla Voigt WORK [redacted]	275.00	0.20	55.00	Billable
12/30/2015 208116	Carla Voigt WORK [redacted]	275.00	0.20	55.00	Billable
1/4/2016 208581	Carla Voigt WORK [redacted] (0.20); [redacted] (0.30); [redacted] (0.30); [redacted] (0.30); [redacted] (0.60); [redacted] (0.80).	300.00	2.50	750.00	Billable

244/Ion Batteries(5): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/5/2016 208586	Carla Voigt WORK Emails exchanges with local counsel for class reps regarding deposition prep materials and scheduling.	300.00	1.00	300.00	Billable
1/6/2016 208590	Carla Voigt WORK Email exchanges with N. Cihlar and local counsel regarding scheduling class rep deposition prep sessions (0.80); email S. Sklaver regarding same (0.20).	300.00	1.00	300.00	Billable
1/7/2016 208328	Nathan Cihlar WORK Teleconference with E. Pickar, L. Eccles and C. Bessette regarding preparation of SD class representative for deposition and to discuss related issues to the same.	550.00	0.70	385.00	Billable
1/7/2016 208594	Carla Voigt WORK Email exchange with W. Cabral regarding availability for deposition prep session for class rep; email S. Sklaver regarding same (0.30); prepare for and sit in on telephonic deposition prep session for class representative C. Bessette with N. Cihlar, L. Eccles, E. Pickar and C. Bessette (1.50); follow up emails regarding same (0.20).	300.00	2.00	600.00	Billable
1/8/2016 208596	Carla Voigt WORK Email exchanges with W. Straus and S. Sklaver regarding deposition prep session availability (0.90); emails regarding signed verification form for W. Cabral (0.10).	300.00	1.00	300.00	Billable
1/11/2016 208603	Carla Voigt WORK Review Cabral deposition materials (0.70); email exchange with K. Pachman regarding Cabral upcoming prep sessions (0.20); route deposition preparation materials to class representative (0.10).	300.00	1.00	300.00	Billable
1/12/2016 208607	Carla Voigt WORK Prepare for and participate in telephonic prep session with K. Pachman, B. Straus and W. Cabral (2.00); follow-up emails regarding same (0.20).	300.00	2.20	660.00	Billable
1/14/2016 208618	Carla Voigt WORK Teleconference with K. Pachman regarding setting up deposition and prep sessions for class rep T. Pham (0.30); email Mr. Pham and local counsel regarding same (0.20).	300.00	0.50	150.00	Billable
1/21/2016 208638	Carla Voigt WORK Teleconference with K. Pachman regarding scheduling for T. Pham class rep deposition and deposition prep sessions (0.20); email exchange with M. Reich regarding same (0.30).	300.00	0.50	150.00	Billable
1/25/2016 208644	Carla Voigt WORK Review email from M. Reich regarding documents for T. Pham's review (0.40); route operative complaint to same (0.10).	300.00	0.50	150.00	Billable
1/27/2016 208648	Carla Voigt WORK Email exchanges with T. Pham and M. Reich regarding availability for deposition and deposition prep sessions (0.40); route availability to K. Pachman (0.10).	300.00	0.50	150.00	Billable
2/2/2016 208790	Carla Voigt WORK Review email from K. Pachman regarding scheduling class rep depositions (0.40); email exchanges with local counsel regarding same (0.10).	300.00	0.50	150.00	Billable

244/Ion Batteries(5): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/5/2016 208801	Carla Voigt WORK	300.00	0.20	60.00	Billable
	Review email from K. Pachman regarding [redacted] deposition scheduling [redacted]				
2/8/2016 208804	Carla Voigt WORK	300.00	0.20	60.00	Billable
	Email K. Pachman regarding [redacted]				
2/9/2016 208806	Carla Voigt WORK	300.00	0.20	60.00	Billable
	Email T. Pham and M. Reich [redacted]				
2/10/2016 209149	Carla Voigt WORK	300.00	0.50	150.00	Billable
	Email exchanges with T. Pham regarding [redacted] (0.30); [redacted] (0.10); [redacted] (0.10).				
2/26/2016 209151	Carla Voigt WORK	300.00	1.00	300.00	Billable
	Email exchanges [redacted] (0.40); [redacted] (0.20); [redacted] (0.40).				
3/1/2016 209572	Carla Voigt WORK	300.00	2.40	720.00	Billable
	Email exchanges [redacted] (0.40); [redacted] (0.70); [redacted] (0.10); [redacted] (0.30); [redacted] (0.30); [redacted] (0.20); [redacted] (0.40).				
3/4/2016 209593	Carla Voigt WORK	300.00	0.20	60.00	Billable
	[redacted]				
3/7/2016 209597	Carla Voigt WORK	300.00	1.00	300.00	Billable
	[redacted]				
3/8/2016 209599	Carla Voigt WORK	300.00	1.80	540.00	Billable
	[redacted] (0.40); [redacted] (1.20); [redacted] (0.20).				
3/11/2016 209612	Carla Voigt WORK	300.00	0.50	150.00	Billable
	[redacted] (0.30); [redacted] (0.10); [redacted] (0.10).				
3/14/2016 209616	Carla Voigt WORK	300.00	0.50	150.00	Billable
	[redacted] (0.10); identify and locate discovery materials (0.40).				

244/Ion Batteries(5): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/21/2016 209629	Carla Voigt WORK	300.00	1.50	450.00	Billable
	[redacted] (0.10); [redacted] (1.10); [redacted] (0.30).				
3/29/2016 209630	Carla Voigt WORK	300.00	1.00	300.00	Billable
	[redacted] (0.80); [redacted] (0.20).				
4/18/2016 210052	Carla Voigt WORK	300.00	0.20	60.00	Billable
	[redacted]				
4/21/2016 210057	Carla Voigt WORK	300.00	0.20	60.00	Billable
	[redacted] (0.10); [redacted] (0.10).				
Total: WORK			29.00		$8,927.50
TOTAL	Billable Fees		29.00		$8,927.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$8,927.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$8,927.50
Total New Balance		$8,927.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
CV	300.00	24.60	$7,380.00	$7,380.00	0.00
CV	275.00	3.30	$907.50	$907.50	0.00
NC	550.00	0.90	$495.00	$495.00	0.00
TDB	725.00	0.20	$145.00	$145.00	0.00

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Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Activity: WORK					
2/21/2014 195585	Shinae Kim-Helms WORK Catalyst training call (0.70); teleconference with R. Spiegel, L. Chan and H. Rim regarding status of document production, searches of documents and other related issues (0.50); review Korean language documents and pre-2001 documents (0.40); populate batches based on said searches (0.40); search for documents relating to California issues and agent issues (0.40); review and analyze said documents (1.50); update cast of characters (0.20); e-mails with H. Rim regarding same (0.20); e-mails with J. Schmitt regarding search features and documents viewing issues (0.20).	385.00	4.50	1,732.50	Billable
2/24/2014 195587	Shinae Kim-Helms WORK E-mails with H. Rim, L. Chan and R. Spiegel regarding document review status (0.90); search for organizational charts in database (0.80); review documents from said searches (1.00); teleconference with customer service at Catalyst regarding document viewing options (0.50); e-mails with H. Rim regarding printing options and search options in Catalyst (0.40); e-mails with H. Rim, L. Chan and R. Spiegel regarding populating batches of pre-2001 documents and bates prefixes (0.40).	385.00	4.00	1,540.00	Billable
2/25/2014 195590	Shinae Kim-Helms WORK Review emails from H. Rim regarding key search terms (0.90); teleconference with H. Rim and R. Spiegel regarding production status, search methods, key search terms, organizational charts, status of document review and other related issues (0.60); review and revise background materials to be circulated to document reviewers (0.40); review background materials and prepare revisions (0.40); e-mails with H. Rim regarding same (0.40); search for and review 2000-2001 conspiracy documents (0.30); confer with J. Moy regarding case updates and other related issues (0.50).	385.00	3.50	1,347.50	Billable
2/26/2014 195592	Shinae Kim-Helms WORK Attend Catalyst training call regarding coding (0.80); teleconference with N. Cihlar regarding search strategies and review of English documents and foreign language documents (0.70); search for and review pre-2000 documents (1.60); e-mails with H. Rim regarding same (0.40).	385.00	3.50	1,347.50	Billable
2/27/2014 195594	Shinae Kim-Helms WORK Attend Catalyst training call regarding searching (1.00); attend English team review call to touch base on English only review (0.90); teleconference with R. Spiegel and N. Cihlar regarding searches to be done and documents to be collected (0.50); e-mails with H. Rim and L. Chan regarding batch assignments (0.60); review and code Korean language documents accordingly (1.00).	385.00	4.00	1,540.00	Billable
2/28/2014 195596	Shinae Kim-Helms WORK E-mails with J. Schmitt regarding inability to search and view documents (0.40); search for hot documents for purpose of amending Complaint (1.00); review and analyze documents from said searches (0.80); prepare fact collection chart (0.80).	385.00	3.00	1,155.00	Billable
2/28/2014 195635	Nathan Cihlar WORK Catalyst document review to identify hot documents for use in our amended complaint (1.50); draft/edit excel spreadsheet with information pertaining to issues re: amended complaint per R. Spiegel (0.90).	350.00	2.40	840.00	Billable
3/3/2014 195598	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding strategy for searching documents (0.50); exchange and review documents (0.90); review and analyze documents from said searches (1.40); prepare fact collection chart (1.40).	425.00	4.20	1,785.00	Billable
3/4/2014 196203	Nathan Cihlar WORK Conduct review of documents on Catalyst to locate factual evidence to support amended complaint.	350.00	2.00	700.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/4/2014 196256	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding hot documents identified for preparation of amendment to complaint (0.30); search for hot documents in database (0.70); review and analyze said documents (0.30); prepare fact collection chart (0.30); e-mails with H. Rim regarding review of pre-2001 batches by English team (0.30); review e-mails from N. Cihlar and R. Spiegel regarding documents covering American subsidiary issue (0.30).	425.00	2.20	935.00	Billable
3/5/2014 196206	Nathan Cihlar WORK Conduct review of documents on Catalyst to locate factual evidence to support amended complaint.	350.00	1.20	420.00	Billable
3/5/2014 196258	Shinae Kim-Helms WORK E-mails with H. Rim regarding print to PDF functions (0.30); review American Subsidiaries related hot documents discovered by N. Cihlar (1.60); review emails with N. Cihlar regarding same (0.30).	425.00	2.20	935.00	Billable
3/7/2014 196216	Nathan Cihlar WORK Conduct review of documents on Catalyst to locate factual evidence to support amended complaint (1.80); draft table outlining pertinent issues for the amended complaint with a focus on the U.S. subsidiaries roles (2.00); outline hot docs in emails to R. Spiegel (0.50); email correspondences regarding same (0.10); teleconferences with S. Kim-Helms regarding review (0.20).	350.00	4.60	1,610.00	Billable
3/7/2014 196261	Shinae Kim-Helms WORK Search for handwritten notes and calendars in database (0.40); review searched documents (0.90); e-mails with H Rim regarding handwritten documents in English and other related search functions (0.40); e-mails with H. Rim and R. Spiegel regarding Korean document review (0.40); e-mails with J. Schmitt regarding locating documents and other related search functions available in Catalyst (0.40); review summary report circulated by R. Spiegel (0.40); e-mails with N. Cihlar regarding search strategies and weak areas to work on (0.50); search for documents for American subsidiary - related documents in database (0.30); review and analyze documents from said searches (0.50); prepare report based on hot documents discovered to date (1.50); send said report to R. Spiegel (0.10).	425.00	5.80	2,465.00	Billable
3/10/2014 196217	Nathan Cihlar WORK Conduct review of documents on Catalyst to locate factual evidence to support amended complaint (2.00); draft table outlining pertinent issues for the amended complaint with a focus on the U.S. subsidiaries roles (1.50); outline hot docs in emails to R. Spiegel (0.20); teleconference with R. Spiegel regarding status of review, next steps and priority assignments; emails with R. Spiegel regarding same (0.30).	350.00	4.00	1,400.00	Billable
3/10/2014 196263	Shinae Kim-Helms WORK Teleconference regarding Indirect review for purpose of amending Complaint (0.90); e-mails with N. Cihlar regarding search strategies (0.40); review, analyze and code handwritten calendars by SDI America (1.60); e-mails with N. Cihlar regarding same (0.40); run searches for documents relating to You Sung Oh of LGC America per N. Cihlar (0.90); e-mails with R. Spiegel regarding LGC document review (0.30).	425.00	4.50	1,912.50	Billable
3/11/2014 196220	Nathan Cihlar WORK Review and analysis of documents for amended complaint (1.50); emails detailing documents requested by L. Chan (0.50); emails with R. Spiegel, L. Chan and S. Kim-Helms regarding potential searches, hot documents (0.50).	350.00	2.50	875.00	Billable
3/11/2014 196265	Shinae Kim-Helms WORK E-mails with Catalyst support regarding issues with PDF viewing (0.60); e-mails with L. Chan and H. Rim regarding Korean language document in Pack Conspiracy batch (1.00); e-mail to H. Rim, L. Chan and R. Spiegel handwritten English documents produced by Maxwell Defendant and LPG, SDI and Sony organizational charts (2.20).	425.00	3.80	1,615.00	Billable
3/12/2014 196267	Shinae Kim-Helms WORK Conduct searches in Catalyst for conspiracy evidence taken place in the USA (3.90); review emails	425.00	7.50	3,187.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	from R. Spiegel regarding issues to be searched for to amend First Consolidated Complaint (0.90); e- mails with N. Cihlar regarding status of document review (0.90); prepare report listing hot documents discovered to date (1.60); submit report to R. Spiegel (0.20).				
3/12/2014 215573	Nathan Cihlar WORK Review and analysis of documents for amended complaint (0.80); emails detailing documents requested by L. Chan (0.50).	350.00	1.30	455.00	Billable
3/13/2014 196224	Nathan Cihlar WORK Review and analysis of documents for amended complaint (2.50); emails detailing documents requested by L. Chan (0.30).	350.00	2.80	980.00	Billable
3/13/2014 196269	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding document review status and other related issues (0.90); conduct searches and review, analyze and code documents (1.00); prepare report based on searches and review (0.50).	425.00	2.40	1,020.00	Billable
3/14/2014 196228	Nathan Cihlar WORK Review and analysis of documents for amended complaint.	350.00	1.50	525.00	Billable
3/14/2014 196271	Shinae Kim-Helms WORK Review fact collection chart circulated by R. Spiegel (0.90); e-mail with N. Cihlar regarding same (0.40); teleconference with N. Cihlar regarding revisions to be made to said fact collection chart (0.50); prepare revised fact collection chart per discussion with N. Cihlar (1.30); conference call with N. Cihlar, R. Spiegel, L. Chan and other English document reviewers to discuss issues related to the amendment to the first consolidated complaint (0.50).	425.00	3.60	1,530.00	Billable
3/16/2014 196272	Shinae Kim-Helms WORK Review revised fact collection chart circulated by R. Spiegel.	425.00	0.20	85.00	Billable
3/17/2014 196273	Shinae Kim-Helms WORK Confer with L. Chan and N. Cihlar to discuss case status and other related issues.	425.00	0.50	212.50	Billable
3/18/2014 196276	Shinae Kim-Helms WORK Review, analyze and prepare rough translations of 2000-2001 documents provided by Defendants per R. Spiegel (4.50); review and code Korean language documents per L. Chan (3.70).	425.00	8.20	3,485.00	Billable
3/19/2014 196278	Shinae Kim-Helms WORK E-mails with R. Spiegel and J. Friedman regarding 2000-2001 documents (1.10); teleconference with R. Spiegel regarding preparing itemized list of 2000-2001 facts (1.10); e-mail with S. Nagano regarding transliteration and translation of Japanese names, titles and location names (0.70); e-mails with R. Spiegel regarding same (0.40); e-mail to H. Rim regarding same (0.40).	425.00	3.70	1,572.50	Billable
3/20/2014 196236	Nathan Cihlar WORK Teleconference with R. Spiegel regarding status of factual review for amended complaint (0.20); meetings with S. Kim-Helms regarding hot documents produced by SDI (0.10); review and analysis of hot documents for potential use in amended complaint (0.30).	350.00	0.60	210.00	Billable
3/20/2014 196280	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding revising sections pertaining to the early class period in draft Amended Complaint (1.00); e-mails with H. Rim regarding Japanese translation of MBI (0.40); review and revise paragraphs pertaining to 2000-20001 class period in draft complaint (1.30); e-mails with R. Spiegel and J. King regarding same (0.40); review e-mails amongst co-counsel regarding searching for additional facts for amendment to Complaint (0.90).	425.00	4.00	1,700.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/21/2014 196282	Shinae Kim-Helms WORK Conduct searches in Catalyst database for documents relating to American subsidiaries for purpose of amending Second Amended Complaint (1.00); review hot document charts from Direct Purchaser Plaintiffs (0.90); e-mails with R. Spiegel regarding same (0.40); cross check same against IPPs charts (0.40); review and analyze documents for American subsidiary issue for the purpose of amending First Consolidated Amended Complaint (1.60); prepare list of fact collection based on said review (1.20).	425.00	5.50	2,337.50	Billable
3/22/2014 196283	Shinae Kim-Helms WORK Review and analyze documents for American subsidiary issue for the purpose of amending First Consolidated Amended Complaint (3.70); prepare list of fact collection based on said review (0.80).	425.00	4.50	1,912.50	Billable
3/23/2014 196238	Nathan Cihlar WORK Review emails from S. Kim Helms regarding assignment from R. Spiegel to prioritize American Sub documents for use in amended complaint (0.30); review and analyze summaries to determine most useful documents for amended complaint (2.20).	350.00	2.50	875.00	Billable
3/23/2014 196284	Shinae Kim-Helms WORK Review and analyze documents for American subsidiary issue for the purpose of amending First Consolidated Amended Complaint (1.90); prepare list of fact collection based on said review (1.70); e-mails with R. Spiegel regarding JM Park of LGCAI (0.50); conduct searches regarding same (0.90).	425.00	5.00	2,125.00	Billable
3/24/2014 196240	Nathan Cihlar WORK Review emails from S. Kim Helms regarding prioritization of American Sub documents for use in amended complaint (0.10); review and analyze summaries to determine most useful documents for amended complaint (1.10); teleconference with S. Kim-Helms regarding same (0.10); emails with R. Speigel regarding same (0.20).	350.00	1.50	525.00	Billable
3/24/2014 196285	Shinae Kim-Helms WORK Review and analyze documents for American subsidiary issue for the purpose of amending First Consolidated Amended Complaint (1.00); prepare list of fact collection based on said review (0.70); teleconference with N. Cihlar regarding status of American subsidiary document review (0.60); e-mails with R. Spiegel regarding same (0.40); submit said list of fact collection (0.50); prepare revision to draft Complaint (0.40); e-mails with R. Spiegel regarding same (0.20); teleconference with R. Spiegel regarding same (0.30); e-mails with V. Glaze regarding translation related issues and document formatting (0.20); conduct research on Cheonan company (0.50); e-mails with R. Spiegel regarding same (0.20).	425.00	5.00	2,125.00	Billable
3/25/2014 196243	Nathan Cihlar WORK Review emails from S. Kim Helms regarding prioritization of American Sub documents for use in amended complaint (0.20); review and analyze summaries to determine most useful documents for amended complaint (1.50); teleconference with R. Spiegel regarding same (0.10); draft summaries for hot documents identified on Catalyst (0.90).	350.00	2.70	945.00	Billable
3/25/2014 196288	Shinae Kim-Helms WORK Research Cheonan Company (0.40); review documents with reference to Choenan Company in Catalyst (0.90); e-mails with R. Spiegel and J. King regarding same (0.40); review and revise relevant paragraphs in draft complaint (1.00); e-mails with J. Bogdanov regarding status of Philips depositions (0.20); review Korean language document and translation thereof per V. Glaze (0.40); e-mails with V. Glaze regarding same (0.20).	425.00	3.50	1,487.50	Billable
3/27/2014 196291	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding reviewing reviewers coding on Catalyst (0.30); e-mails with N. Cihlar regarding same (0.20).	425.00	0.50	212.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/28/2014 196293	Shinae Kim-Helms WORK E-mails with N. Cihlar and R. Spiegel regarding QC of English reviewers coding in Catalyst.	425.00	0.50	212.50	Billable
3/31/2014 196294	Shinae Kim-Helms WORK Review English reviewers hot document chart and list of English reviewers (0.90); conduct searches in Catalyst for documents coded by English reviewers (0.90); prepare chart for analysis of document review by English reviewers (1.60); analyze same (0.70); e-mails with N. Cihlar regarding same (0.40).	425.00	4.50	1,912.50	Billable
4/1/2014 196975	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding QC of English reviewers coding in Catalyst (0.20); review analysis chart revised by N. Cihlar (0.20).	425.00	0.40	170.00	Billable
4/2/2014 196977	Shinae Kim-Helms WORK Review coding by English reviewers in Catalyst database (0.90); analyze reviewers notes in Catalyst database (3.60); revise analysis chart (2.10); e-mails with N. Cihlar regarding same (0.40).	425.00	7.00	2,975.00	Billable
4/3/2014 196979	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding chart analyzing English reviewers coding (0.30); review and revise said analysis chart (0.20).	425.00	0.50	212.50	Billable
4/8/2014 196923	Casey Hare WORK Search and retrieve case document per request of N. Cihlar (0.20).	145.00	0.20	29.00	Billable
4/8/2014 196982	Shinae Kim-Helms WORK Review emails between R. Spiegel and N. Cihlar regarding drafting coding manual for document reviewers (0.90); search for pull documents used to support factual allegations in Complaint (2.00); prepare chart (1.20); e-mails with N. Cihlar regarding same (0.40).	425.00	4.50	1,912.50	Billable
5/9/2014 197445	Shinae Kim-Helms WORK Review DPPs and IPPs second amended complaints (0.90); research on key terms (0.40); revise list of key terms per request of R. Spiegel (0.50).	425.00	1.80	765.00	Billable
5/15/2014 197457	Shinae Kim-Helms WORK Review email from R. Spiegel regarding review of Samsung SDI documents (0.20); respond to same (0.10).	425.00	0.30	127.50	Billable
5/16/2014 197458	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding upcoming review of Samsung SDI document review.	425.00	0.10	42.50	Billable
5/29/2014 197460	Shinae Kim-Helms WORK Conference call with co-counsel regarding overall strategy to conduct document review (0,90); training call regarding setting up new batches and how batch review works (0.80); e-mails with N. Cihlar regarding coding manual and discovery plans (0.40); e-mails with R. Spiegel regarding coding manual (0.40).	425.00	2.50	1,062.50	Billable
5/29/2014 197868	Thomas M. Palumbo WORK Teleconference with co-lead counsel and others regarding document review setup, procedures and other related logistical issues (0.60); conferences with N. Cihlar regarding document review related issues (0.30); teleconference with document review platform provider, co-lead counsel and other counsel regarding document review technical issues and other related issues (0.50); review document review manual and other supporting materials, conferences with N. Cihlar regarding same (0.60).	350.00	2.00	700.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/4/2014 198024	Shinae Kim-Helms WORK Catalyst training call and document coding training call (1.00); review coding manual (1.00).	425.00	2.00	850.00	Billable
6/5/2014 198026	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding responding to document coding-related questions from reviewers (0.50); e-mails and teleconferences with N. Cihlar regarding date coding and other coding-related matters (1.10); review, analyze and code Samsung SDI documents (2.40).	425.00	4.00	1,700.00	Billable
6/6/2014 198028	Shinae Kim-Helms WORK Teleconference with co-counsel to discuss initial status of document review, QCing, coding and other related issues (0.80); review, analyze and code Samsung SDI documents (3.20).	425.00	4.00	1,700.00	Billable
6/9/2014 198030	Shinae Kim-Helms WORK Review, analyze and code Samsung SDI documents.	425.00	3.50	1,487.50	Billable
6/10/2014 198032	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding T2 review and other related issue (0.70); teleconference with R. Spiegel, N. Cihlar and J. Schmitt regarding setting up T2 review folders (0.70); review draft translation protocol circulated by R. Spiegel (0.80); prepare redlined revision to same (1.30); review, analyze and code Samsung SDI production (1.00).	425.00	4.50	1,912.50	Billable
6/11/2014 197953	Thomas M. Palumbo WORK Conferences with N. Cihlar regarding proposed revisions to protocol governing certified translations; propose edits to the same; locate materials and review for the same (1.20); review correspondence from co-counsel regarding document review training related issues; review and analyze materials in advance of training session (0.80).	350.00	2.00	700.00	Billable
6/11/2014 198034	Shinae Kim-Helms WORK Review revisions to translation protocol proposed by co-counsel (1.80); review, analyze and code Samsung SDI production in Catalyst (1.70).	425.00	3.50	1,487.50	Billable
6/12/2014 197959	Thomas M. Palumbo WORK Conferences with N. Cihlar regarding translation protocol and other issues regarding same (0.30); review and revise same, conferences with N. Cihlar regarding related issues (0.20).	350.00	0.50	175.00	Billable
6/12/2014 198036	Shinae Kim-Helms WORK Review emails between co-counsel regarding translation protocols and related issues (1.80); review, analyze and code Samsung SDI production in Catalyst (1.70).	425.00	3.50	1,487.50	Billable
6/13/2014 197961	Thomas M. Palumbo WORK Review and analyze support materials for document review (0.50); participate in teleconference document review training (1.00).	350.00	1.50	525.00	Billable
6/16/2014 197965	Thomas M. Palumbo WORK Review and analyze document review coding manual, second amended complaint and other supporting materials in advance of starting substantive document review (0.70); review, analyze and code documents produced by various Defendants (0.50); prepare notes regarding same (0.30).	350.00	1.50	525.00	Billable
6/16/2014 198039	Shinae Kim-Helms WORK Review revised translation protocol.	425.00	0.40	170.00	Billable
6/16/2014 198100	Megan Day WORK Print and organize document review materials per the request of T. Palumbo.	145.00	0.30	43.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/18/2014 197972	Thomas M. Palumbo WORK Review and code documents; prepare notes regarding same (5.30); review and analyze document review materials (0.50); conferences with N. Cihlar and S. Kim-Helms regarding related issues (0.20).	350.00	6.00	2,100.00	Billable
6/19/2014 197976	Thomas M. Palumbo WORK Review and code documents; prepare notes regarding same (4.00); review and analyze document review materials (0.50).	350.00	4.50	1,575.00	Billable
6/19/2014 198043	Shinae Kim-Helms WORK Review, analyze and code Samsung SDI production.	425.00	5.50	2,337.50	Billable
6/26/2014 197992	Thomas M. Palumbo WORK Review and code documents produced by various Defendants; prepare notes regarding same.	350.00	2.00	700.00	Billable
7/1/2014 198729	Shinae Kim-Helms WORK Review emails between co-counsel and Catalyst regarding changes to coding pane	425.00	0.20	85.00	Billable
7/1/2014 198787	Thomas M. Palumbo WORK Teleconference with co-counsel and co-lead counsel regarding document review related issues.	350.00	1.00	350.00	Billable
7/2/2014 198788	Thomas M. Palumbo WORK Review and code documents produced by various Defendants and prepare notes regarding same (5.50); review and analyze related materials (1.00).	350.00	6.50	2,275.00	Billable
7/3/2014 198789	Thomas M. Palumbo WORK Review and code documents produced by various Defendants; prepare notes regarding same; review and analyze related materials.	350.00	4.00	1,400.00	Billable
7/7/2014 198732	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding SDI production review (0.30); teleconference with R. Kim regarding same (0.30); set up batch for R. Kim to review (0.30); e-mails with R. Kim regarding same (0.30); review and code SDI documents (0.30).	425.00	1.50	637.50	Billable
7/7/2014 198790	Thomas M. Palumbo WORK Review and code documents produced by various Defendants; prepare notes regarding same; review and analyze related materials.	350.00	1.00	350.00	Billable
7/8/2014 198734	Shinae Kim-Helms WORK Review e-mails from co-counsel regarding document review.	425.00	0.20	85.00	Billable
7/9/2014 198791	Thomas M. Palumbo WORK Review updated document review support materials (0.10); review, analyze and code documents produced by Defendants, prepare notes regarding same (0.40).	350.00	0.50	175.00	Billable
7/10/2014 198792	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review and analyze document review support materials; prepare notes based on review.	350.00	2.20	770.00	Billable
7/11/2014 198793	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review and analyze document review support materials; prepare notes based on review.	350.00	4.00	1,400.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/17/2014 198741	Shinae Kim-Helms WORK Review and search for documents reviewed by R. Kim (1.80); e-mails with R. Spiegel regarding same (0.40); e-mails with R. Kim regarding status of SDI document review (0.50); QC documents coded by R. Kim (1.10); provide R. Kim with feedback (0.40); review, analyze and code SDI production (2.30).	425.00	6.50	2,762.50	Billable
7/22/2014 198746	Shinae Kim-Helms WORK Attend teleconference with J. Schmitt, R. Spiegel, and H. Rim to discuss technical issues in Catalyst coding pane (0.90); e-mail summary to N. Cihlar (0.30); e-mails with N. Cihlar regarding same (0.30).	425.00	1.50	637.50	Billable
7/23/2014 198748	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding QC of English review in merits phase (0.90); review and search for documents coded by English reviewers in Catalyst (4.20); export relevant data (0.90); prepare document review result chart (0.80); review and analyze coding by English review team (1.70).	425.00	8.50	3,612.50	Billable
7/23/2014 198794	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; draft and revise notes regarding same (1.30); email correspondence with J. Verducci regarding issues regarding platform, attempt to troubleshoot same (0.20).	350.00	1.50	525.00	Billable
7/24/2014 198750	Shinae Kim-Helms WORK Attend teleconference with document team leaders to discuss status of document review by each team, changes necessary to coding pane, QC of English review and other related issues (1.10); continue to review and analyze coding by English review team (4.00); prepare QC analysis chart (1.50); e-mails with J. Verducci regarding initials used by English review team (0.20); review documents coded by English review team (1.70).	425.00	8.50	3,612.50	Billable
7/24/2014 198795	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; draft and revise notes regarding same.	350.00	6.50	2,275.00	Billable
7/25/2014 198752	Shinae Kim-Helms WORK Continue to review and analyze coding by English review team (1.00); prepare QC analysis chart (0.50); review documents coded by English T1 reviewers (0.90); e-mail to N. Cihlar regarding same (0.40); e-mails with S. Nagano regarding initials used by Japanese reviewers (0.70).	425.00	3.50	1,487.50	Billable
7/29/2014 198755	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding QC chart for merits review (0.40); e-mails with N. Cihlar regarding same (0.20); review and revise said chart (0.40).	425.00	1.00	425.00	Billable
7/30/2014 198757	Shinae Kim-Helms WORK Review and revise reviewer and QC charts circulated by J. Verducci.	425.00	0.50	212.50	Billable
8/1/2014 198760	Shinae Kim-Helms WORK Emails with H. Rim regarding QC of English coding.	425.00	0.20	85.00	Billable
8/4/2014 198762	Shinae Kim-Helms WORK Review and code SDI documents with reference to NEC therein (1.00); e-mails with B. Gralewski regarding same (0.50).	425.00	1.50	637.50	Billable
8/4/2014 198856	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; prepare notes regarding same.	350.00	3.50	1,225.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/5/2014 199088	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding status of SDI production review (0.60); e-mails with R. Kim regarding same (0.40); review and code SDI production in Catalyst (4.10); prepare hot document list (2.00).	425.00	7.10	3,017.50	Billable
8/5/2014 199223	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review materials related to same; draft and revise notes regarding same.	350.00	2.20	770.00	Billable
8/6/2014 199224	Shinae Kim-Helms WORK Teleconference with R. Kim regarding status of Korean language document review and other related issues (0.90); set up batch for R. Kim to review (2.50); review and code SDI produced documents in Catalyst (3.90); prepare hot doc list accordingly (2.20).	425.00	9.50	4,037.50	Billable
8/7/2014 198986	Thomas M. Palumbo WORK Analyze and code documents produced by Defendants, review materials, draft and revise notes regarding same.	350.00	2.00	700.00	Billable
8/7/2014 199226	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of SDI document review (1.80); teleconference with Document Review Team Leaders on the status of document review, quality control and other related issues (3.10); e-mails with N. Cihlar and T. Palumbo regarding vendor contract and general status related issues (2.90).	425.00	7.80	3,315.00	Billable
8/8/2014 198988	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review materials related to same; draft and revise notes regarding same.	350.00	5.00	1,750.00	Billable
8/8/2014 199092	Shinae Kim-Helms WORK Review and code SDI produced documents in Catalyst (7.20); prepare hot doc list accordingly (2.30).	425.00	9.50	4,037.50	Billable
8/11/2014 198991	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review materials related to same; draft and revise notes regarding same (1.70); draft, review and revise batch summary memoranda and route same to J. Verducci (0.30).	350.00	2.00	700.00	Billable
8/11/2014 199095	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding hot document list (0.50); e-mails with N. Cihlar regarding general issues in English review QC (0.50); review and code SDI produced documents in Catalyst (6.50); prepare hot doc list accordingly (1.30).	425.00	8.80	3,740.00	Billable
8/12/2014 199097	Shinae Kim-Helms WORK Review draft e-mail regarding Consortra contract (0.90); teleconference with N. Cihlar regarding same (0.50); review e-mails from R. Spiegel regarding translation status (0.90); review and code SDI production on Catalyst database (1.00); QC SDI production coded by R. Kim (1.50); e-mails with R. Kim regarding coding (0.40); prepare hot document list (1.60).	425.00	6.80	2,890.00	Billable
8/12/2014 199189	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review materials related to same; draft and revise notes regarding same (4.00); draft, review and revise batch summary memoranda and route same to J. Verducci (0.20).	350.00	4.20	1,470.00	Billable
8/13/2014 199099	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding QC method (0.40); review and code SDI production on Catalyst database (3.50); prepare hot document list (1.60); QC SDI production coded by R. Kim (1.40); e-	425.00	8.20	3,485.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	mails with R. Kim regarding coding (0.40); review updated version of coding manual per R. Spiegel (0.90).				
8/13/2014 199192	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; review materials related to same; draft and revise notes regarding same (3.30); draft, review and revise batch summary memoranda and route same to J. Verducci (0.20).	350.00	3.50	1,225.00	Billable
8/14/2014 199101	Shinae Kim-Helms WORK Attended reviewers group call to discuss status of document review and issues relating to coding (0.90); attend group leaders teleconference to discuss status updates (0.50); QC SDI production coded by R. Kim (0.30); e-mails with R. Kim regarding coding (0.40); review and code SDI production on Catalyst database (0.90); prepare hot document list (1.60); QC SDI production coded by R. Kim (1.00); e-mails with R. Kim regarding coding (0.40); review updated version of coding manual per R. Spiegel (0.90); assess SDI document review status and overall document review statics (0.50); e-mails with H. Rim regarding same (0.40).	425.00	7.80	3,315.00	Billable
8/14/2014 215396	Thomas M. Palumbo WORK Review translation related materials, conferences with R. Noh regarding organizing and revisions to same (0.80); teleconference with lead counsel and co-counsel regarding document review status and other related issues (0.80); review and revise points to address in advance of status call, conferences with N. Cihlar regarding same (1.50); review, analyze and code documents produced by Defendants and review materials related to same, draft and revise notes regarding same (1.00)	350.00	4.10	1,435.00	Billable
8/15/2014 199103	Shinae Kim-Helms WORK Review and code SDI production on Catalyst database (4.20); prepare hot document list (1.80); QC SDI production coded by R. Kim (1.80); e-mails with R. Kim regarding coding (0.40).	425.00	8.20	3,485.00	Billable
8/18/2014 199105	Shinae Kim-Helms WORK Review and code SDI production on Catalyst database (2.50); prepare hot document list (1.40); QC SDI production coded by R. Kim (1.50); e-mails with R. Kim regarding coding (0.40).	425.00	5.80	2,465.00	Billable
8/19/2014 199107	Shinae Kim-Helms WORK Review time commitment chart circulated by J. Verducci (0.50); e-mails with R. Kim regarding code language used for Defendants (0.30); review and code SDI production in Catalyst (0.50); QC coding of SDI production by R. Kim (0.50); rearrange review folder for R. Kim (0.90).	425.00	2.70	1,147.50	Billable
8/19/2014 199176	Thomas M. Palumbo WORK Review translation tracking materials from V. Glaze and compare to existing IPP materials (0.40); review and revise IPP master translation tracking materials (0.80); conferences with R. Noh and N. Cihlar regarding same (0.20); email correspondence with N. Cihlar regarding related issues (0.20).	350.00	1.60	560.00	Billable
8/20/2014 199109	Shinae Kim-Helms WORK Review and code SDI production in Catalyst (0.90); QC coding of SDI production by R. Kim (0.70); rearrange review folder for R. Kim (0.90).	425.00	2.50	1,062.50	Billable
8/21/2014 199111	Shinae Kim-Helms WORK E-mails with T. Palumbo regarding sharing translation related materials (0.40); attend weekly team leaders teleconference, lead by R. Spiegel, to discuss translation related issues and QC of T1 reviewers (0.90); prepare and provide call summary to N. Cihlar (1.00); e-mails with N. Cihlar regarding plan to pause document review and reviewers coding (0.90); review and code SDI production in Catalyst (0.90); QC coding of SDI production by R. Kim (0.50).	425.00	4.60	1,955.00	Billable
8/21/2014 199182	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; prepare notes regarding same (1.60); draft list of best documents for submission to lead counsel (0.40); conferences with N. Cihlar regarding document review related issues (0.10); email correspondence with J. Verducci regarding	350.00	2.30	805.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	various document review issues (0.20).				
8/22/2014 199113	Shinae Kim-Helms WORK Review and code SDI production in Catalyst (1.80); QC coding of SDI production by R. Kim (0.90); e-mails with R. Kim regarding coding (0.40); e-mails with R. Spiegel regarding same (0.40).	425.00	3.50	1,487.50	Billable
8/22/2014 199184	Thomas M. Palumbo WORK Review notes prepared over course of review; draft and revise list of best documents for submission to lead counsel; route same.	350.00	1.20	420.00	Billable
8/25/2014 199207	Nathan Cihlar WORK Analysis of documents requested for translation by Japanese attorneys (0.40); circulate same to S.Kim-Helms for identification (0.10).	350.00	0.50	175.00	Billable
8/26/2014 198992	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants (0.50); prepare notes regarding same (1.00)	350.00	1.50	525.00	Billable
8/27/2014 198996	Thomas M. Palumbo WORK Email correspondence with V. Glaze regarding translation related issues.	350.00	0.20	70.00	Billable
8/28/2014 199119	Shinae Kim-Helms WORK Attend team leaders weekly teleconference, led by R. Spiegel, to discuss coding and review specific issues, setting up defendant teams, and translation related issues (0.90); e-mails with N. Cihlar regarding informal translation assignments to S. Nagano (0.30); e-mails with H. Rim regarding same (0.30).	425.00	1.50	637.50	Billable
8/29/2014 199003	Thomas M. Palumbo WORK Review translation related correspondence(0.10); organize and update materials regarding same(0.20); review and revise master translation tracking chart (0.20).	350.00	0.50	175.00	Billable
9/2/2014 199550	Shinae Kim-Helms WORK E-mails with T. Palumbo regarding summary translations of Korean documents (0.30); e-mails with R. Kim regarding status of Korean document review (0.20).	425.00	0.50	212.50	Billable
9/4/2014 199553	Shinae Kim-Helms WORK Attend weekly teleconference, lead by R. Spiegel, with other T2 reviewers to discuss QC of T1 reviewers and translation related issues (0.30); revise and update English reviewer QC chart and forward to R. Spiegel (0.50); e-mails with discovery team regarding same (0.20).	425.00	1.00	425.00	Billable
9/5/2014 199555	Shinae Kim-Helms WORK Review SDI production (5.50); complete T1 coding of SDI production (1.20).	425.00	6.70	2,847.50	Billable
9/5/2014 199594	Thomas M. Palumbo WORK Review correspondence from V. Glaze regarding translation related issues (0.20); update and revise translation tracking materials (0.50).	350.00	0.70	245.00	Billable
9/8/2014 199557	Shinae Kim-Helms WORK Review SDI production (1.20); complete T1 coding of SDI production (1.30); QC English teams T1 coding (1.00); prepare QC chart (1.00).	425.00	4.50	1,912.50	Billable
9/9/2014 199559	Shinae Kim-Helms WORK Review and search for documents coded by English T1 reviewers (3.50); evaluate coding of same (0.50); prepare QC summaries for English reviewers assigned by R. Spiegel (1.60); review and T2	425.00	6.50	2,762.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	code SDI production in Catalyst database (0.90).				
9/10/2014 199561	Shinae Kim-Helms WORK Teleconferences with N. Cihlar regarding QC of documents coded by English reviewers (0.90); review and search for documents coded by English T1 reviewers (0.90); evaluate coding of same (1.20); prepare QC summaries for English reviewers per N. Cihlar (1.60).	425.00	4.60	1,955.00	Billable
9/10/2014 199602	Thomas M. Palumbo WORK Review and revise translation tracking materials (1.00); email correspondence with V. Glaze regarding translation coordination related issues (0.50); organize translations (0.50).	350.00	2.00	700.00	Billable
9/11/2014 199563	Shinae Kim-Helms WORK E-mails with discovery team leaders regarding QC chart and topics for next call.	425.00	0.20	85.00	Billable
9/12/2014 199565	Shinae Kim-Helms WORK Review SDI documents and T2 code same.	425.00	2.00	850.00	Billable
9/15/2014 199567	Shinae Kim-Helms WORK Teleconference with discovery team leaders to discuss QC results of reviewers and other discovery related issues (0.40); review SDI documents and T2 code same (1.60).	425.00	2.00	850.00	Billable
9/16/2014 199569	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding English document review (0.40); review and T2 code SDI production (4.60).	425.00	5.00	2,125.00	Billable
9/17/2014 199570	Shinae Kim-Helms WORK Review and analyze documents regarding meetings attended by SDI individuals (1.40); research on said SDI individuals (0.50); provide V. Glaze with accurate transliterations of names (0.20); e-mails with V. Glaze regarding related issues (0.40); review and T2 code SDI production (0.90); prepare SDI hot document chart (1.60); review SDI hot documents (0.90); revise said chart (1.60).	425.00	7.50	3,187.50	Billable
9/18/2014 199572	Shinae Kim-Helms WORK Attend discovery team leaders weekly conference call, led by R. Spiegel (0.30); prepare summary of call per N. Cihlar (0.20).	425.00	0.50	212.50	Billable
9/24/2014 199577	Shinae Kim-Helms WORK Join teleconference with discovery team leaders, led by R. Spiegel, to discuss new phase two document review and T2 coding of English and Japanese documents (0.90); teleconference with R. Spiegel regarding locations of English and Japanese document to be T2-coded and assignments (0.50); get tally of outstanding documents to be T2-coded (0.40); email summary to discovery team leaders (0.40).	425.00	2.20	935.00	Billable
9/24/2014 215398	Thomas M. Palumbo WORK Review correspondence from R. Spiegel regarding document review related issues.	350.00	0.10	35.00	Billable
9/25/2014 199579	Shinae Kim-Helms WORK Review SDI document and corresponding translation for correct transliteration of Japanese names (0.40); search Catalyst database for brief background information of potential individuals named in said SDI documents (0.20); conduct web searches for same (0.20); teleconference and e-mails with N. Cihlar regarding same (0.50); provide summary of searches and results by email (0.40).	425.00	1.70	722.50	Billable
9/29/2014 199582	Shinae Kim-Helms WORK E-mails with L. Chan regarding QC of English review team member (0.30); review and code NEC and Hitachi Japanese and English documents (4.20).	425.00	4.50	1,912.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/29/2014 199642	Thomas M. Palumbo WORK Conference with N. Cihlar regarding document review status and upcoming assignments(0.20); review correspondence from R. Spiegel and others regarding document review(0.10); review and analyze review materials (0.20).	350.00	0.50	175.00	Billable
9/30/2014 199647	Thomas M. Palumbo WORK Teleconference with co-counsel regarding resumption of document review (0.50); review and analyze updated materials (0.40); conferences with N. Cihlar regarding document review related issues (0.10).	350.00	1.00	350.00	Billable
9/30/2014 199738	Shinae Kim-Helms WORK Attend discovery review teams conference call re: second phase review (0.70); review and code NEC and Hitachi documents in Catalyst database (6.50); review revised coding manual and cast of characters (0.30).	425.00	7.50	3,187.50	Billable
10/2/2014 199741	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding NEC document in Chinese (0.50); review order regarding motions to dismiss Second Consolidated Amended Complaint (3.00); review and T1/T2 code Hitachi documents in Japanese and English in Catalyst (2.00).	425.00	5.50	2,337.50	Billable
10/3/2014 199680	Richard Noh WORK Update master translation tracking list with recent translations.	145.00	1.00	145.00	Billable
10/6/2014 200047	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; prepare notes regarding same; review and analyze materials related to same.	350.00	4.30	1,505.00	Billable
10/7/2014 200050	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; prepare notes regarding same; review and analyze supporting materials.	350.00	3.30	1,155.00	Billable
10/13/2014 200090	Shinae Kim-Helms WORK Review SDIs pass-through documents per L. Chan (1.00); e-mails with L. Chan regarding same (0.50).	425.00	1.50	637.50	Billable
10/20/2014 200069	Thomas M. Palumbo WORK Review materials related to document review, Sony corporate structure and other related materials.	350.00	0.80	280.00	Billable
10/21/2014 200114	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; prepare notes regarding same; review and analyze related materials.	350.00	4.50	1,575.00	Billable
10/22/2014 200098	Shinae Kim-Helms WORK Review Indirect Purchaser Plaintiffs Third Consolidated Amended Complaint (0.30); e-mails with new Korean language reviewers (0.20).	425.00	0.50	212.50	Billable
10/22/2014 200120	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; prepare notes regarding same; review and analyze related materials.	350.00	5.20	1,820.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/23/2014 200099	Shinae Kim-Helms WORK Attend weekly teleconference with other discovery team leaders (0.50); discuss status of current projects and other related issues (0.50).	425.00	1.00	425.00	Billable
10/23/2014 200123	Thomas M. Palumbo WORK Review, analyze and code documents produced by various Defendants; prepare notes regarding same; review and analyze related materials.	350.00	5.50	1,925.00	Billable
10/27/2014 200103	Shinae Kim-Helms WORK E-mails with J. Verducci regarding list of current T1 reviewers.	425.00	0.20	85.00	Billable
10/28/2014 200072	Thomas M. Palumbo WORK Review, analyze and code documents produced by Defendants; draft, review and revise notes on same (1.10); teleconference with co-counsel regarding document review status and other related issues (0.50).	350.00	1.60	560.00	Billable
10/28/2014 200105	Shinae Kim-Helms WORK Join Reviewers Call led by R. Spiegel.	425.00	0.70	297.50	Billable
10/29/2014 200106	Shinae Kim-Helms WORK Review and code Hitachi Maxwell documents in Catalyst (1.80); review emails between co-counsel regarding list of current reviewers (0.90); review LGC document identified by H. Rim as needing corrections to translation (1.50).	425.00	4.20	1,785.00	Billable
10/30/2014 200109	Shinae Kim-Helms WORK Attend discovery team leaders call, led by R. Spiegel, to discuss discovery-related issues (0.90); review and code Hitachi Maxwell documents in Catalyst (2.60).	425.00	3.50	1,487.50	Billable
10/31/2014 200111	Shinae Kim-Helms WORK Review and code Hitachi Maxwell documents in Catalyst (4.80); review emails between co-counsel regarding coding family documents individually (0.70).	425.00	5.50	2,337.50	Billable
11/3/2014 200112	Shinae Kim-Helms WORK Review and code Hitachi Maxwell and Sony documents in Catalyst (3.40); e-mail to Japanese review team regarding Japanese language documents to review in Hitachi Maxwell production (0.60).	425.00	4.00	1,700.00	Billable
11/4/2014 201239	Shinae Kim-Helms WORK Attend weekly reviewers conference call, led by R. Spiegel, to discuss status of current assignments and any coding-related issues (0.70); review and T1/T2 code Sony documents in Catalyst (3.00).	425.00	3.70	1,572.50	Billable
11/5/2014 201241	Shinae Kim-Helms WORK Review and T1/T2 code Sony documents in Catalyst.	425.00	1.50	637.50	Billable
11/5/2014 201626	Thomas M. Palumbo WORK Review and update master translation tracking chart (0.40); email correspondence with R. Spiegel regarding same (0.10).	350.00	0.50	175.00	Billable
11/6/2014 201243	Shinae Kim-Helms WORK Attend weekly managers conference call, led by R. Spiegel, to discuss status of current assignments, search term list and any other related issues (0.70); review and T1/T2 code Sharp documents in Catalyst (2.00); prepare list of search terms in Korean language (1.80).	425.00	4.50	1,912.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/7/2014 201245	Shinae Kim-Helms WORK Review and T1/T2 code Sony and Hitachi documents in Catalyst (2.50); prepare list of search terms in Korean language (0.50).	425.00	3.00	1,275.00	Billable
11/7/2014 201629	Thomas M. Palumbo WORK Review and analyze search strings and queries for subsequent review batches per request of N. Cihlar; review and analyze related materials (0.50); draft additional search terms and strings and route same to N. Cihlar (0.30); review and revise correspondence routing same (0.10); conferences with N. Cihlar regarding related issues (0.10).	350.00	1.00	350.00	Billable
11/13/2014 201252	Shinae Kim-Helms WORK T2 coding of Hitachi Maxwell documents in Catalyst (2.00); review list of search term revised by N. Cihlar (0.60); e-mail with N. Cihlar regarding same (0.40).	425.00	3.00	1,275.00	Billable
11/14/2014 201255	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of document review (0.70); T2 coding of Hitachi Maxwell documents in Catalyst (5.00).	425.00	5.70	2,422.50	Billable
11/18/2014 201258	Shinae Kim-Helms WORK Join reviewers call, led by R. Spiegel and receive updates on review status and other related issues (0.60); e-mails with H. Rim regarding Romanization of Korean names (0.40).	425.00	1.00	425.00	Billable
11/19/2014 201260	Shinae Kim-Helms WORK E-mails with C. Lin and S. Nagano regarding interpreter recommendation (0.40); e-mails with R. Spiegel regarding status of T2 review of Hitachi, NEC and YUASA productions (0.40); review and T2 code first phase Hitachi production (3.40).	425.00	4.20	1,785.00	Billable
11/19/2014 201646	Thomas M. Palumbo WORK Locate and route certain materials to R. Speigel per request of N. Cihlar.	350.00	0.10	35.00	Billable
11/20/2014 201262	Shinae Kim-Helms WORK Review and T2 code first phase Hitachi production (2.00); e-discussion with H. Rim via email regarding QC of Japanese review team (0.10); join team leaders call, led by R. Spiegel, to discuss current status of T1 and T2 document review (0.50); teleconference with N. Cihlar regarding preparing de-duplicated list of LGC production (0.50); review and compare LGC documents to prepare de-duplicated list (0.40).	425.00	3.50	1,487.50	Billable
11/20/2014 201648	Thomas M. Palumbo WORK Conference with N. Cihlar regarding document review related issues (0.20); email correspondence with R. Spiegel regarding related issues (0.10).	350.00	0.30	105.00	Billable
11/21/2014 201264	Shinae Kim-Helms WORK Review draft translations prepared by J. Choi and J. Jeong (3.00); provide R. Spiegel and N. Cihlar with feedback (0.50); e-mails with R. Spiegel and N. Cihlar regarding same (0.30); review and compare LGC documents to prepare de-duplicated list (1.20).	425.00	5.00	2,125.00	Billable
11/24/2014 201266	Shinae Kim-Helms WORK Review and compare LGC documents to prepare de-duplicated list (7.00); teleconference with N. Cihlar regarding the same (0.50).	425.00	7.50	3,187.50	Billable
11/26/2014 201269	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding translations available for SDI production.	425.00	0.20	85.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/7/2014 201279	Shinae Kim-Helms WORK Review L. Chans summary of Tuesday and Thursday calls with reviewers (0.80); review redlined contract with translation company and comments from other counsel (0.20).	425.00	1.00	425.00	Billable
12/8/2014 201281	Shinae Kim-Helms WORK Review Toshiba related hot conspiracy documents for additional names to be added to Toshiba custodian list (2.00); e-mails with D. Lambrinos regarding same (0.50).	425.00	2.50	1,062.50	Billable
12/9/2014 201304	Shinae Kim-Helms WORK Attend Reviewers Weekly Conference call led by R. Spiegel (0.50); discuss status of document review (0.20); confer with T. Palumbo regarding same (0.30).	425.00	1.00	425.00	Billable
12/10/2014 201306	Shinae Kim-Helms WORK Review Q1 and Q2 coding of recent SDI production by J. Kim and J. Jeong(4.00); provide summary of said SDI production and QC feedback of Korean language reviewers coding to R. Spiegel (0.50).	425.00	4.50	1,912.50	Billable
12/11/2014 201308	Shinae Kim-Helms WORK Join weekly conference call, led by R. Spiegel, with other discovery team leaders (0.50); discuss status of document review and QC related issues (0.30); confer with N. Cihlar regarding same (0.20).	425.00	1.00	425.00	Billable
12/16/2014 201312	Shinae Kim-Helms WORK Attend weekly reviewers call, led by R. Spiegel, for updates on document review projects.	425.00	0.80	340.00	Billable
12/16/2014 201333	Thomas M. Palumbo WORK Teleconference with co-counsel regarding document review status and coding.	350.00	0.50	175.00	Billable
12/30/2014 201323	Shinae Kim-Helms WORK Review fully executed contract with translation company (1.30); review and T1/T2 code Sony production (1.20).	425.00	2.50	1,062.50	Billable
1/6/2015 201692	Thomas M. Palumbo WORK Teleconference with lead and co-counsel regarding document review.	350.00	0.50	175.00	Billable
1/6/2015 201862	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of document review (0.50); join reviewers call, led by R. Spiegel to discuss recent updates (0.50).	425.00	1.00	425.00	Billable
1/7/2015 201864	Shinae Kim-Helms WORK Review and T1 & T2 code Sony production in Catalyst.	425.00	2.00	850.00	Billable
1/8/2015 201866	Shinae Kim-Helms WORK Review and T1 & T2 code Sony production in Catalyst (7.20); join team leaders weekly teleconference, led by R. Spiegel (0.80); e-mails with R. Spiegel regarding Sony document review (0.50).	425.00	8.50	3,612.50	Billable
1/9/2015 201868	Shinae Kim-Helms WORK Prepare informal translation of SDI document per N. Cihlar (1.50); teleconference and e-mails with N. Cihlar regarding same (0.50); continue to review and T1 & T2 code Sony production in Catalyst (6.50).	425.00	8.50	3,612.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/10/2015 201870	Shinae Kim-Helms WORK E-mails with N. Cihar regarding translation of Toshiba organization charts in Japanese.	425.00	0.70	297.50	Billable
1/12/2015 201872	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding preparing translations of Toshiba organization charts (0.50); e-mails and teleconference with S. Nagano to discuss selecting portions to translate (0.50); receive and review informal translations prepared by S. Nagano (1.20).	425.00	2.20	935.00	Billable
1/13/2015 201874	Shinae Kim-Helms WORK E-mails with S. Nagano regarding informal full translations of Toshiba organization charts (0.50); join reviewers call, led by R. Spiegel (0.50).	425.00	1.00	425.00	Billable
1/15/2015 201733	Anna Gooding WORK Updating master tracking list with recent translations per request of N. Cihlar.	145.00	0.70	101.50	Billable
1/15/2015 201877	Shinae Kim-Helms WORK Join team leaders teleconference, led by R. Spiegel (0.80); e-mails with N. Cihlar regarding translation tracking chart (0.40).	425.00	1.20	510.00	Billable
1/16/2015 201879	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding Sanyo organizational charts to translate (0.40); review same (0.50); join document review managers call, led by R. Spiegel (0.50); review materials circulated by R. Spiegel (0.60).	425.00	2.00	850.00	Billable
1/20/2015 201884	Shinae Kim-Helms WORK Join weekly reviewers call, led by R. Spiegel (0.30); discuss status of document review and other related issues (0.20).	425.00	0.50	212.50	Billable
1/21/2015 201886	Shinae Kim-Helms WORK E-mails with T. Lee and S. Nagano regarding translation assignment (0.20); review LGs response to 1st interrogatories (0.20); check translation status of documents identified in same (0.20); e-mails with N. Cihlar regarding same (0.10).	425.00	0.70	297.50	Billable
1/22/2015 201888	Shinae Kim-Helms WORK E-mails with H. Rim regarding Samsung SDI production (0.40); coordinate translation assignments between Japanese language reviewers (0.40); e-mails with H. Rim regarding informal translations prepared by Japanese language review team (0.40); review and finalize said informal translations (0.40); join review team managers weekly call, led by R. Spiegel, to discuss status of document review and any other related issues (0.40).	425.00	2.00	850.00	Billable
1/23/2015 201890	Shinae Kim-Helms WORK E-mails with L. Chan regarding informal translation of SDI document (0.30); e-mails with R. Noh regarding formatting informal translations (0.30); review e-mails regarding discontinued document review (0.40).	425.00	1.00	425.00	Billable
1/27/2015 201894	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding assignments for informal translations (0.30); review documents requested for translation (0.20).	425.00	0.50	212.50	Billable
1/27/2015 201941	Richard Noh WORK Update master translation tracking list with recent translations (0.50); save and organize discovery produced by Defendants (0.60).	145.00	1.10	159.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/28/2015 201896	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding requests for informal translations of Sony transactional data (0.70); e-mails with H. Rim regarding availability of Japanese language reviewers (0.50); e-mails with R. Nozaki, A. Elder, C. Nishimura and R. Spiegel regarding translation assignments (0.60).	425.00	1.80	765.00	Billable
1/29/2015 201898	Shinae Kim-Helms WORK E-mails with H. Rim regarding informal translations of Sony transactional data documents (0.20); teleconference with N. Cihlar regarding Defendants productions on transactional data and requests for informal translations (0.10); e-mails with N. Cihlar and R. Noh regarding SDI informal translations (0.20); join managers weekly conference call, led by R. Spiegel and discuss status of document review and informal translations of organizational charts and transactional data (0.40); teleconference with N. Cihlar regarding status of translation tracking chart (0.10); e-mails with R. Noh regarding same (0.30).	425.00	1.30	552.50	Billable
1/29/2015 201942	Richard Noh WORK Update master translation tracking list with recent translations (1.80); save and organize discovery produced by Defendants (0.40).	145.00	2.20	319.00	Billable
1/30/2015 201945	Richard Noh WORK Update master translation tracking list with recent translations (0.30); save and organize documents per the request of N. Cihlar (0.20).	145.00	0.50	72.50	Billable
2/2/2015 201902	Shinae Kim-Helms WORK Review informal translations prepared by Japanese language reviewers (0.30); e-mails with N. Cihlar regarding said informal translations (0.20); assign transactional data documents produced by Defendants to Japanese language reviewers for informal translations (0.20); e-mails with Japanese language reviewers regarding same (0.30).	425.00	1.00	425.00	Billable
2/3/2015 202168	Shinae Kim-Helms WORK Review SONY transactional data in foreign language requested to be translated (0.60); e-mails with Japanese language review team regarding informal translations (0.30); e-mails with N. Cihlar regarding same (0.30); review informal translations prepared by Japanese language reviewers (0.30).	425.00	1.50	637.50	Billable
2/4/2015 202121	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize discovery produced by Defendants (0.20).	145.00	1.00	145.00	Billable
2/4/2015 202170	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding NECT translation assignments (0.40); assign translations to A. Elder (0.10).	425.00	0.50	212.50	Billable
2/5/2015 202172	Shinae Kim-Helms WORK Review Japanese language documents produced by Panasonic and Sanyo in translation request list for duplicate documents per R. Spiegel (0.90); e-mail to R. Spiegel regarding results of said review (0.90); join managers weekly call, lead by R. Spiegel to discuss status of translations and other related issues (0.40); prepare full translation of LGC documents (1.60); e-mails with N. Cihlar regarding translation assignments for Japanese language review team (0.20); e-mails with Japanese language review team regarding same (0.80).	425.00	4.80	2,040.00	Billable
2/6/2015 202174	Shinae Kim-Helms WORK Review NECT translations prepared by Japanese language review team (0.60); e-mails with Japanese language review team regarding same (0.20); e-mails with N. Cihlar regarding status of NECT translations (0.20).	425.00	1.00	425.00	Billable
2/9/2015 202177	Shinae Kim-Helms WORK Review NECT translations prepared by Japanese language review team (0.40); e-mails with	425.00	1.00	425.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Japanese language review team regarding same (0.20); e-mails with N. Cihlar regarding status of NECT translations (0.20); e-mails with R. Spiegel regarding translation of Korean document (0.20).				
2/10/2015 202179	Shinae Kim-Helms WORK Review full NECT translations prepared by Japanese language review team (1.00); e-mails with T. Lee, A. Elder and C. Nishimura regarding said full translations (0.20); e-mails with J. Jeong regarding translation of Korean document (0.20); review Korean document requested for translation (0.90); e-mails with R. Noh and N. Cihlar regarding new translation requests and status of translation assignments (0.20).	425.00	2.50	1,062.50	Billable
2/11/2015 202127	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize discovery produced by Defendants (0.20).	145.00	1.00	145.00	Billable
2/11/2015 202145	Thomas M. Palumbo WORK Review correspondence regarding certain translation related issues (0.10); draft response to same per request of N. Cihlar, route same to him for review and service (0.20); conferences with C. Voigt regarding related issues (0.10); teleconference with N. Cihlar regarding related issues (0.10).	350.00	0.50	175.00	Billable
2/11/2015 202181	Shinae Kim-Helms WORK Teleconference with T. Palumbo regarding batteries transactional data files (0.30); review said files (0.30); provide summaries of said files (0.20); review full NECT translations prepared by Japanese language review team (0.60); e-mails with J. Jeong, T. Lee, A. Elder and C. Nishimura regarding said full translations (0.20); e-mail with N. Cihlar and R. Spiegel regarding status of translation assignments (0.40); e-mails with N. Cihlar regarding [redacted] produced by LGC (0.40).	425.00	2.40	1,020.00	Billable
2/12/2015 202129	Richard Noh WORK Update master translation tracking list with recent translations.	145.00	0.50	72.50	Billable
2/12/2015 202183	Shinae Kim-Helms WORK Join managers weekly teleconference, led by R. Spiegel (0.50); e-mails with N. Cihlar and R. Spiegel regarding [redacted] (0.40); review and analyze documents requested for translation (1.00); assign documents for translations to Japanese language review team (0.10); review full NECT translations prepared by Japanese language review team (0.40); e-mails with T. Lee, A. Elder and C. Nishimura regarding said full translations and availability (0.50); e-mail with N. Cihlar regarding status of translation assignments (0.40); e-mails with H. Rim regarding [redacted] translation proofreading (0.40).	425.00	3.70	1,572.50	Billable
2/13/2015 202185	Shinae Kim-Helms WORK E-mails with L. Chan regarding upcoming deposition of LGC former employee (0.40); e-mails with H. Rim regarding proofreading translations (0.40); analyze errors found in LGC translations (1.70).	425.00	2.50	1,062.50	Billable
2/15/2015 202186	Shinae Kim-Helms WORK Review [redacted] memorandum forwarded by L. Chan (0.90); search documents related to [redacted] information in Catalyst and Internet (1.50); review said documents and existing [redacted] forwarded by L. Chan (0.90); update said [redacted] [redacted] memo (0.20).	425.00	3.50	1,487.50	Billable
2/17/2015 202132	Richard Noh WORK Update master translation tracking list with recent translations (0.60); update case files with recent translations (0.30).	145.00	0.90	130.50	Billable
2/17/2015 202189	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of translation [redacted] (0.20); check status of translation assignments by Japanese review team (0.30).	425.00	0.50	212.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/18/2015 202134	Richard Noh WORK Update master translation tracking list with recent translations (0.40)	145.00	0.40	58.00	Billable
2/18/2015 202191	Shinae Kim-Helms WORK E-mails with T. Lee, S. Nozaki and C. Nishimura regarding urgent translation assignments (0.40); e-mails with N. Cihlar regarding translation assignment status (0.40); review informal translations prepared by Japanese language reviewers (1.10); e-mails with R. Spiegel and N. Cihlar regarding new translation requests [redacted] (0.40); assign new translation assignments out to Japanese language review team (0.70); teleconference with N. Cihlar regarding said translation assignments (0.50).	425.00	3.50	1,487.50	Billable
2/19/2015 202136	Richard Noh WORK Update master translation tracking list with recent translations (0.50); update case files with recent translations (0.40).	145.00	0.90	130.50	Billable
2/19/2015 202193	Shinae Kim-Helms WORK Review informal translations prepared by said reviewers (0.80); e-mails with R. Noh regarding translation tracking chart and informalities in certain informal translations (0.40); e-mails with Japanese and Chinese language reviewers regarding new translation assignments and revisions to be made to existing informal translations (0.80); teleconference with N. Cihlar regarding same (0.50).	425.00	2.50	1,062.50	Billable
2/20/2015 202138	Richard Noh WORK Update master translation tracking list with recent translations (0.50); update case files with recent translations (0.50).	145.00	1.00	145.00	Billable
2/20/2015 202195	Shinae Kim-Helms WORK Receive and review new translation requests from experts and S. Scarlett (0.40); e-mails with N. Cihlar regarding availability of Japanese language reviewers (0.40); assign documents for translation out to Japanese language review team (0.40); review informal translations prepared by Japanese language review team (0.40); manage translations assignments amongst Japanese language review team (0.40); e-mails with H. Rim regarding status of translation assignments (0.10); teleconference with N. Cihlar regarding status of translations requested by experts (0.40).	425.00	2.50	1,062.50	Billable
2/23/2015 202140	Richard Noh WORK Update master translation tracking list with recent translations.	145.00	0.50	72.50	Billable
2/23/2015 202197	Shinae Kim-Helms WORK Review informal translations prepared by Japanese language review team (0.40); continue to assign documents to be translated to Japanese language review team (0.40); e-mails with Japanese language review team regarding same (0.10); e-mails with N. Cihlar regarding status of said translation assignments (0.10).	425.00	1.00	425.00	Billable
2/24/2015 202157	Richard Noh WORK Update master translation tracking list with recent translations (0.40); save and organize Defendant produced discovery (0.60).	145.00	1.00	145.00	Billable
2/24/2015 202199	Shinae Kim-Helms WORK E-mails with B. Troxel regarding translation status [redacted] (0.20); assign [redacted] documents for translation to Japanese language review team (0.50); e-mails with Japanese language reviewers regarding same (0.50); review informal translations prepared by Japanese language reviewers (0.70); prepare zip folder of informal translations to send [redacted] (0.20); e-mails with N. Cihlar regarding status of informal translations (0.20); teleconference with N. Cihlar regarding status of informal translations requested [redacted] for translations with Direct Purchaser Plaintiffs (0.20).	425.00	2.50	1,062.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/25/2015 202160	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize Defendant produced discovery (1.00).	145.00	1.80	261.00	Billable
2/25/2015 202201	Shinae Kim-Helms WORK Assign Panasonic transactional data documents to Japanese language reviewers (0.20); e-mails with Japanese language reviewers regarding same (0.20); review informal translations prepared by Japanese language reviewers (0.50); teleconference with N. Cihlar regarding translation status of Panasonic transactional data documents (0.50); review Defendants correspondences regarding production of transactional data documents (0.60).	425.00	2.00	850.00	Billable
2/26/2015 202162	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize Defendant produced discovery (1.40).	145.00	2.40	348.00	Billable
2/26/2015 202203	Shinae Kim-Helms WORK Review informal translations prepared by Japanese language reviewers (0.40); compile same and circulate [redacted] (0.40); assign Panasonic transactional data documents to Japanese language reviewers (0.20); e-mails with Japanese language reviewers regarding same (0.20); e-mails with N. Cihlar and R. Noh regarding list [redacted] (0.20); e-mails with R. Noh regarding names of Japanese language reviewers who prepared translations [redacted] tracking chart (0.20); join weekly managers teleconference, led by R. Spiegel (0.50); discuss translation related issues during said call (0.40).	425.00	2.50	1,062.50	Billable
2/27/2015 202164	Richard Noh WORK Update master translation tracking list with recent translations (0.80).	145.00	0.80	116.00	Billable
2/27/2015 202205	Shinae Kim-Helms WORK Review informal translations prepared by Japanese language reviewers (0.20); compile same and circulate to experts (0.20); e-mails with Japanese language reviewers regarding same (0.20); review e-mail correspondences between N. Cihlar and DPPs regarding exchange of informal translations (0.20); assign additional [redacted] documents to Japanese language reviewers (0.20); review search term chart circulated by R. Spiegel (0.40); e-mails with N. Cihlar regarding same (0.40); review [redacted] produced by various Defendants (0.90); review translation requests [redacted] (0.40); teleconference with N. Cihlar regarding same (0.40).	425.00	3.50	1,487.50	Billable
3/2/2015 202166	Richard Noh WORK Update master translation tracking list with recent translations (1.30).	145.00	1.30	188.50	Billable
3/2/2015 202208	Shinae Kim-Helms WORK Review informal translations prepared by Japanese language reviewers (0.50); compile same and circulate [redacted] (0.20); e-mails with Japanese language reviewers regarding same (0.90); e-mails with N. Cihlar regarding status of translations and QC related issues (0.40).	425.00	2.00	850.00	Billable
3/3/2015 202438	Richard Noh WORK Update master translation tracking list with recent translations (0.90).	145.00	0.90	130.50	Billable
3/3/2015 202465	Shinae Kim-Helms WORK E-mails with Japanese language reviewers regarding availability (0.20); e-mails with reviewers regarding corrupted files (0.20); review informal translations prepared by Japanese language reviewers (0.60).	425.00	1.00	425.00	Billable
3/4/2015 202472	Shinae Kim-Helms WORK Review translation protocol and related materials from Park IP.	425.00	0.40	170.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/5/2015 202440	Richard Noh WORK Update master translation tracking list with recent translations (0.50); save and organize Defendant produced discovery (3.30).	145.00	3.80	551.00	Billable
3/5/2015 202467	Shinae Kim-Helms WORK E-mails with Japanese language reviewers regarding translation status of [redacted] documents (0.40); e-mails with DPPs regarding missing translation from set of translation prepared by DPPs (0.40); e-mails with R. Spiegel regarding formatting of translations prepared by DPPs (0.40); e-mails [redacted] regarding translations prepared by DPPs (0.30); join weekly managers call, run by R. Spiegel, to discuss translation status and other related issues (0.80); review and revise Korean portion of search terms chart circulated by R. Spiegel (4.20).	425.00	6.50	2,762.50	Billable
3/6/2015 202442	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize new informal translations (0.20).	145.00	1.00	145.00	Billable
3/6/2015 202469	Shinae Kim-Helms WORK Review informal translations prepared by foreign language reviewers (0.50); [redacted] documents for translations to Japanese review team (0.90); e-mails with Japanese review team regarding said assignments (0.50); review informal translations prepared by DPPs (3.60); e-mails with DPPs regarding same (0.40); e-mails with H. Rim and R. Spiegel regarding Korean search terms (0.20); review newly produced various [redacted] forwarded by B. Toxel (0.20); e-mails with N. Cihlar and B. Toxel regarding same (0.20); e-mails with R. Spiegel regarding translation of [redacted] in Korean (0.20); prepare informal translations of [redacted] (0.30).	425.00	7.00	2,975.00	Billable
3/9/2015 202444	Richard Noh WORK Update master translation tracking list with recent translations (1.30); save and organize new informal translations (0.70).	145.00	2.00	290.00	Billable
3/9/2015 202471	Shinae Kim-Helms WORK Review and compile informal translations prepared by Japanese language reviewers (1.60); e-mails with Japanese language reviewers regarding same (0.50); e-mails with N. Cihlar and R. Noh regarding translation tracking chart (0.40); prepare informal translations [redacted] (3.50).	425.00	6.00	2,550.00	Billable
3/10/2015 202446	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.50); update master translation tracking list with recent translations (2.00).	145.00	2.50	362.50	Billable
3/10/2015 202473	Shinae Kim-Helms WORK E-mails with R. Spiegel and H. Hsu regarding translation of Chinese portions [redacted] (0.40); review translations prepared by H. Hsu (1.30); e-mails with Japanese language reviewers regarding informal translation assignments (0.90); review and compile informal translations prepared by Japanese language reviewers (1.60); assign translations of NECB documents to T. Lee and C. Nishimura (0.20); review list of documents for translation circulated by L. Chan (0.90); compare and search for near duplicates to said documents (0.20); e-mail to L. Chan and others regarding translation status of said documents and near duplicates (0.40); e-mails with R. Noh regarding same (0.40); continue to translate LGE transactional data (0.20).	425.00	6.50	2,762.50	Billable
3/10/2015 215565	Nathan Cihlar WORK Review and analysis of hot documents proposed by L. Chan needing certified translation (0.50); analysis of the same and begin review for duplicates (0.80); teleconference with S. Kim-Helms regarding ongoing review of hot documents needing translations (0.50).	350.00	1.80	630.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/11/2015 202447	Richard Noh WORK	145.00	3.90	565.50	Billable
	Update translation status per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (1.50); save and organize new informal translations (1.70).				
3/11/2015 202474	Shinae Kim-Helms WORK	425.00	6.30	2,677.50	Billable
	E-mails with Japanese language reviewers regarding status of translation assignments (0.40); assign new translation assignments out to Japanese review team (0.20); review and compile informal translations prepared by Japanese language review team (1.50); teleconference with N. Cihlar regarding status of informal translations and translation requests by R. Spiegel and L. Chan (0.50); e-mails with R. Noh regarding status of documents in translation list (0.40); review e-mail from R. Spiegel regarding translation list (0.90); e-mails with N. Cihlar regarding same (0.40); e-mails with H. Rim regarding availability of Japanese review team for document analysis assignment (0.40); review and analyze documents appearing on translation list (1.00); compare with near duplicates (0.20); finalize translation list (0.20); continue to translate [redacted] (0.20).				
3/12/2015 202448	Richard Noh WORK	145.00	3.00	435.00	Billable
	Update translation status per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (1.50); save and organize new informal translations (0.80).				
3/12/2015 202476	Shinae Kim-Helms WORK	425.00	5.00	2,125.00	Billable
	Review translation requests [redacted] (1.90); check status of informal translations prepared by IPPs and DPPs (0.50); e-mails with N. Cihlar regarding final list of documents for translation (0.40); review and compile informal translations prepared by Japanese language reviewers (0.50); e-mails with Japanese language reviewers regarding translation assignments (0.50); review email from experts regarding translation requests (0.50); respond to said email and compile and forward informal translations prepared by foreign language review team (0.50); continue to translate [redacted] (0.20).				
3/13/2015 202449	Richard Noh WORK	145.00	1.00	145.00	Billable
	Update master translation tracking list with recent translations (0.80); save and organize new informal translations (0.20).				
3/13/2015 202477	Shinae Kim-Helms WORK	425.00	3.50	1,487.50	Billable
	Review and compile informal translations prepared by Japanese language reviewers (1.60); e-mails with Japanese language reviewers regarding translation assignments (0.90); e-mails with C. Nishimura regarding opening partially corrupted files (0.40); e-mails with R. Spiegel [redacted] regarding same (0.40); e-mails [redacted] regarding opening and translating [redacted] (0.20).				
3/16/2015 202453	Richard Noh WORK	145.00	1.00	145.00	Billable
	Update master translation tracking list with recent translations (0.80); save and organize new informal translations (0.20).				
3/16/2015 202478	Shinae Kim-Helms WORK	425.00	1.00	425.00	Billable
	E-mails with Japanese language reviewers regarding status of informal translations of [redacted] (0.10); assign more translation assignments out (0.10); review and compile informal translations prepared by Japanese language reviewers (0.80).				
3/17/2015 202456	Richard Noh WORK	145.00	2.00	290.00	Billable
	Update translation status per the request of S. Kim-Helms (0.50); update master translation tracking list with recent translations (1.20); save and organize new informal translations (0.30).				
3/17/2015 202479	Shinae Kim-Helms WORK	425.00	1.00	425.00	Billable
	E-mails with Japanese and Chinese language reviewers regarding status translation [redacted] (0.10); review and compile informal translations prepared by Japanese language review team (0.10); review and proofread translations of LGC potential deposition exhibits				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.80).				
3/18/2015 202457	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.20); update master translation tracking list with recent translations (1.00); save and organize new informal translations (0.30).	145.00	1.50	217.50	Billable
3/18/2015 202480	Shinae Kim-Helms WORK E-mails with S. Nozaki and A. Elder regarding Chinese portions [redacted] (0.40); compile and review informal translations gathered from Japanese language review team (2.00); e-mails with R. Spiegel regarding status [redacted] (0.40); e-mails with N. Cihlar regarding status of informal translations [redacted] (0.50); review agenda for managers call circulated by R. Spiegel (0.30); review and proofread translations of LGC potential deposition exhibits (2.20).	425.00	5.80	2,465.00	Billable
3/19/2015 202458	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize new informal translations (0.20).	145.00	1.00	145.00	Billable
3/19/2015 202481	Shinae Kim-Helms WORK Join weekly managers teleconference led by R. Spiegel to receive and discuss case updates and other related issues (0.50); teleconference with N. Cihlar regarding same (0.50); e-mails with H. Hsu regarding translation [redacted] (0.40); compile and circulate informal translations [redacted] (0.50); review competing versions of informal translations prepared by DPPs and IPPs (2.00); prepare chart with recommended version to use with analysis (2.00); teleconference with N. Cihlar regarding translation status of LGC documents identified by V. Glaze (0.50).	425.00	6.40	2,720.00	Billable
3/20/2015 202462	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (0.50).	145.00	1.50	217.50	Billable
3/20/2015 202482	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding competing informal translations prepared by DPPs and IPPs (0.70); compare said two competing versions and revise selected version (1.80); prepare revised translations (3.40); e-mails with N. Cihlar regarding same (0.40).	425.00	6.30	2,677.50	Billable
3/21/2015 202483	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding informal translation of SDI document (0.30); review and compile informal translations [redacted] prepared by Japanese language review team (0.40); assign [redacted] to H. Hsu (0.30).	425.00	1.00	425.00	Billable
3/23/2015 202463	Richard Noh WORK Update master translation tracking list with recent translations (0.80); save and organize new informal translations (0.20).	145.00	1.00	145.00	Billable
3/24/2015 202684	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding DPPs glossary(0.10); review and propose revisions to said DPPs glossary (0.80); review and compile [redacted] translations prepared by Japanese language review team (0.40); review proposed revisions to informal translations by H. Rim (0.30); e-mails with N. Cihlar regarding same (0.10); review and proofread LGC [redacted] (0.40); prepare list of revisions to be made (0.40).	425.00	2.50	1,062.50	Billable
3/24/2015 202741	Richard Noh WORK Update master translation tracking list with recent translations (1.50); save and organize new informal translations (0.50).	145.00	2.00	290.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/25/2015 202685	Shinae Kim-Helms WORK Review Sony correspondence regarding additional production (0.80); review DPPs proposed revisions to IPPs informal translations (0.80); e-mails with N. Cihlar regarding same (0.30); review emails with DPPs regarding informal translations and revisions to same (0.30); review IPPs glossary (0.30); combine same with DPPs glossary (0.30); review and revise combined version (0.30); send revised combined glossary to R. Spiegel (0.30); review and proofread [redacted] (0.30); prepare list of revisions to be made (0.30).	425.00	4.00	1,700.00	Billable
3/25/2015 202742	Richard Noh WORK Update master translation tracking list with recent translations (1.70); save and organize new informal translations (0.80); prepare foreign documents for translation request (1.50).	145.00	4.00	580.00	Billable
3/26/2015 202686	Shinae Kim-Helms WORK Review and compile NECB translations prepared by Japanese language review team (1.60); join weekly managers conference call, led by R. Spiegel (0.50); teleconference with N. Cihlar regarding status of translation of transactional data (0.50); review emails between IPPs and DPPs regarding combined glossary (0.90); review and proofread [redacted] (1.00); prepare list of revisions to be made (1.60); e-mails with R. Spiegel regarding same (0.40).	425.00	6.50	2,762.50	Billable
3/26/2015 202743	Richard Noh WORK Update master translation tracking list with recent translations (1.70); save and organize new informal translations (0.40); prepare foreign documents for translation request (1.50); email correspondence with translation company regarding the same (1.40).	145.00	5.00	725.00	Billable
3/27/2015 202687	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding translation vendor-related issues (0.40); receive and review informal partial translation of SDI document (0.50); e-mails with N. Cihlar regarding same (0.70); prepare full translations [redacted] (2.50); e-mails with N. Cihlar regarding same (0.40).	425.00	4.50	1,912.50	Billable
3/27/2015 202744	Richard Noh WORK Update master translation tracking list with recent translations (2.10); save and organize new informal translations (0.40); prepare foreign documents for translation request (2.10); email correspondence with translation company regarding the same (0.40).	145.00	5.00	725.00	Billable
3/30/2015 202688	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding priority LGC translations [redacted] (0.40); continue to prepare full translations of [redacted] (0.50); e-mails with H. Hsu regarding translation of Chinese portion [redacted] (0.40); review documents for translations from L. Chan (0.20); search for duplicates and compare with same (0.30); e-mails with N. Cihlar regarding same (0.40); e-mail to L. Chan comparison results (0.40); e-mails with N. Cihlar regarding splitting LGC translation assignments with DPPs (0.40).	425.00	3.00	1,275.00	Billable
3/30/2015 202745	Richard Noh WORK Update translation status per the request of N. Cihlar (0.30); update master translation tracking list with recent translations (1.30); save and organize new informal translations (0.40).	145.00	2.00	290.00	Billable
3/31/2015 202689	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding documents for translations sent by L. Chan and splitting LGC transactional data translations with DPPs (0.40); e-mails with Japanese language review team regarding status of NECB and NECT translation assignments (0.90); review reproduced [redacted] (1.00); e-mails with N. Cihlar and L. Chan regarding same (0.40).	425.00	2.70	1,147.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/31/2015 202746	Richard Noh WORK Update master translation tracking list with recent translations (1.40); save and organize new informal translations (0.30); prepare foreign documents for translation request (1.30).	145.00	3.00	435.00	Billable
4/1/2015 202690	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding competing versions of NECT translations by DPPs (0.40); compare said two versions (0.70); exchange informal translations of [redacted] with DPPs (0.50); e-mails with Japanese language review team regarding status of translation assignment and availability (0.40).	425.00	2.00	850.00	Billable
4/1/2015 202748	Richard Noh WORK Update master translation tracking list with recent translations (1.30); save and organize new informal translations (0.70).	145.00	2.00	290.00	Billable
4/2/2015 202691	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding proofreading Sanyo and LGC draft translations (0.50); proofread LGC draft translations per R. Spiegel (1.70).	425.00	2.20	935.00	Billable
4/2/2015 202750	Richard Noh WORK Update master translation tracking list with recent translations (1.60); save and organize new informal translations (0.70); prepare draft translations for revision (0.40); email correspondence regarding the same (0.30).	145.00	3.00	435.00	Billable
4/3/2015 202692	Shinae Kim-Helms WORK Continue to proofread LGC draft translations.	425.00	1.50	637.50	Billable
4/3/2015 202751	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (0.60); prepare draft translations for revision (1.00); email correspondence regarding the same (0.40).	145.00	3.00	435.00	Billable
4/6/2015 202693	Shinae Kim-Helms WORK Continue to proofread LGC draft translation (1.00); e-mails with M. Day and R. Noh regarding English portion in draft translation that was re-typed from original document (0.40); e-mails with V. Glaze regarding operative versions of informal translations (0.40); e-mails with Korean language reviewers regarding proofreading draft translations of SDI documents (0.90); e-mails with R. Noh regarding informal translations sent to Consortra (0.40); e-mails with N. Cihlar regarding same (0.40); teleconferences with V. Glaze and A. Kikuchi regarding same (0.50); receive informal translations from DPPs (0.20); review and update tracking chart (0.90); e-mails [redacted] regarding status of informal translation of transactional data (0.40).	425.00	5.50	2,337.50	Billable
4/6/2015 202752	Richard Noh WORK Update translation status per the request of N. Cihlar (0.30); update master translation tracking list with recent translations (1.40); review draft translation per the request of S. Kim-Helms (0.30).	145.00	2.00	290.00	Billable
4/6/2015 203327	Megan Day WORK Compare documents including english portion in draft translations that were re-typed from original document (2.50); e-mails with S. Kim-Helms and R. Noh regarding same (0.50).	145.00	3.00	435.00	Billable
4/7/2015 202986	Shinae Kim-Helms WORK E-mails with Korean language review team regarding proofreading of informal translations of SDI and LGC documents (0.90); e-mails with N. Cihlar regarding documents for translation sent by L. Chan (0.40); e-mails with R. Noh regarding revision to LGC translation (0.40); review translation list by B. Troxel (0.90); proofread LGC draft translation (1.60).	425.00	4.20	1,785.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/7/2015	Richard Noh	145.00	3.00	435.00	Billable
202996	WORK				
	Update master translation tracking list with recent translations (2.10); save and organize new informal translations (0.30); prepare foreign documents for translation request (0.30); email correspondence with translation company regarding the same (0.30).				
4/8/2015	Shinae Kim-Helms	425.00	2.00	850.00	Billable
202987	WORK				
	Teleconferences with R. Noh regarding informal translations sent to Consortra and revisions to same (0.50); e-mail to DPPs regarding Sanyo informal translation (0.40); e-mails with R. Noh regarding proofreading draft translation of organization chart in Korean (0.20); review and compare various versions of informal translations (0.90).				
4/8/2015	Richard Noh	145.00	2.50	362.50	Billable
202997	WORK				
	Update master translation tracking list with recent translations (0.50); save and organize new informal translations (0.30); proofread draft translation per the request of S. Kim-Helms (1.20); email correspondence with translation company regarding revisions to draft translations (0.50).				
4/9/2015	Shinae Kim-Helms	425.00	3.20	1,360.00	Billable
202988	WORK				
	Proofread SDI draft translations (1.20); emails with R. Noh regarding same (0.40); e-mails with J. Moy regarding status of [redacted] translations (0.40); check translation status of various foreign language documents per B. Toxel (0.20); e-mails with R. Noh regarding same (0.40); e-mails with S. Nozaki regarding translation of replacement file (0.40); continue to proofread SDI draft translations (0.20).				
4/9/2015	Richard Noh	145.00	1.50	217.50	Billable
202998	WORK				
	Update master translation tracking list with recent translations (0.60); save and organize new informal translations (0.30); update translation status per the request of S. Kim-Helms (0.10); proofread draft translation per the request of S. Kim-Helms (0.20); email correspondence with translation company regarding revisions to draft translations (0.30).				
4/10/2015	Shinae Kim-Helms	425.00	2.50	1,062.50	Billable
202989	WORK				
	E-mails with A. Kikuchi regarding replacement copy of foreign language document (0.40); e-mails with H. Rim regarding availability of Japanese language reviewers (0.90); e-mails with N. Ahuja regarding incomplete translation of Sony document (0.40); e-mails with T. Lee regarding same (0.40); e-mails with Japanese language reviewers to re-arrange translation assignments (0.40).				
4/10/2015	Richard Noh	145.00	2.00	290.00	Billable
203000	WORK				
	Update master translation tracking list with recent translations (1.60); save and organize new informal translations; proofread draft translation per the request of S. Kim-Helms (0.40).				
4/13/2015	Shinae Kim-Helms	425.00	4.50	1,912.50	Billable
202990	WORK				
	E-mails with Japanese language reviewers to re-arrange translation assignments (0.90); e-mails to Japanese language review team regarding newly assigned translation projects (0.90); receive and review DPPs informal translations (0.90); e-mails with A. Kikuchi regarding corrupted characters in SONY document (0.40); e-mails with N. Cihlar regarding status of informal translations and certified translations (0.40); proofread SDI draft translations (1.00).				
4/13/2015	Richard Noh	145.00	2.00	290.00	Billable
203002	WORK				
	Update master translation tracking list with recent translations (1.40); email correspondence with translation company regarding revisions to draft translations (0.30); proofread draft translation per the request of S. Kim-Helms (0.30).				
4/14/2015	Richard Noh	145.00	2.30	333.50	Billable
203003	WORK				
	Update master translation tracking list with recent translations (1.00); save and organize new informal translations (0.30); prepare foreign documents for translation request (0.40); email correspondence with translation company regarding the same (0.30); proofread draft translation per the request of S. Kim-Helms (0.30).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/14/2015	Shinae Kim-Helms	425.00	3.20	1,360.00	Billable
203075	WORK				
	E-mail with N. Cihlar regarding status of Hitachi transactional data (0.50); e-mails with A. Elder regarding translation assignments (0.50); compile informal translations prepared by Japanese language reviewers (1.40); e-mails with B. Toxel regarding translation status of requested documents (0.40); e-mail to R. Noh regarding romanization of Korean names and proofreading LGC organization chart (0.40).				
4/15/2015	Richard Noh	145.00	3.00	435.00	Billable
203004	WORK				
	Update master translation tracking list with recent translations (1.40); save and organize new informal translations (0.30); proofread draft translation per the request of S. Kim-Helms (1.30).				
4/15/2015	Shinae Kim-Helms	425.00	4.80	2,040.00	Billable
203076	WORK				
	E-mails with R. Noh regarding status of informal and certified translations and tracking chart updates (0.40); review informal translations sent to translation company for certification (1.60); e- mails with R. Noh regarding same (0.40); e-mails with N. Cihlar regarding same (0.40); proofread SDI draft translations prepared by translation company (2.00).				
4/16/2015	Richard Noh	145.00	4.00	580.00	Billable
203005	WORK				
	Update master translation tracking list with recent translations (1.70); save and organize new informal translations (0.30); proofread draft translation per the request of S. Kim-Helms (1.00); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding revisions to translations (0.50).				
4/16/2015	Shinae Kim-Helms	425.00	4.70	1,997.50	Billable
203077	WORK				
	E-mails with B. Miller regarding newly produced TSB production and translation requests (0.40); proofread SDI draft translations prepared by translation company (3.50); join managers weekly conference call, led by R. Spiegel and receive updates on Defendants productions and other related issues (0.80).				
4/17/2015	Richard Noh	145.00	2.50	362.50	Billable
203007	WORK				
	Update master translation tracking list with recent translations (1.20); proofread draft translation per the request of S. Kim-Helms (0.30); review certified translations for formatting accuracy (0.30; email correspondence with translation company regarding revisions to translations (0.70).				
4/17/2015	Shinae Kim-Helms	425.00	1.00	425.00	Billable
203078	WORK				
	Proofread SDI draft translations prepared by translation company (0.80); receive and review DPPs informal translations circulated by A. Lunzer (0.20).				
4/20/2015	Richard Noh	145.00	4.50	652.50	Billable
203008	WORK				
	Update master translation tracking list with recent translations (0.30); save and organize new informal translations (1.00); proofread draft translation per the request of S. Kim-Helms (3.20).				
4/20/2015	Shinae Kim-Helms	425.00	8.50	3,612.50	Billable
203079	WORK				
	E-mails with J. Jeong regarding availability (0.40); assign J. Jeong draft translations to proofread (0.30); e-mails with H. Hsu regarding status of informal translations to be prepared (0.50); e-mails with R. Spiegel regarding staffing issues (0.40); e-mails to and with DPPs regarding informal translations that have been and to be prepared by IPPs (0.80); teleconference with N. Cihlar regarding status of informal translations and case updates (1.00); e-mails with B. Troxel regarding newly produced LGC production (0.40); e-mails with R. Noh regarding status of proofreading LGC draft translation (0.40); continue to proofread SDI draft translation prepared by translation company (3.20); review newly produced LGC documents (0.50); e-mails with J. Moy regarding same (0.20); review and revise revision to LGC draft translation prepared by R. Noh (0.40).				
4/21/2015	Shinae Kim-Helms	425.00	8.20	3,485.00	Billable
202991	WORK				
	Teleconference with N. Cihlar regarding informal translation requested by L. Chan and status of certified translations on way (0.70); prepare informal translation of SDI document (4.00); teleconferences with R. Noh and Consortra regarding translation status (0.50); e-mails with N. Cihlar				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	reporting calls with Consortra (0.50); proofread SDI draft translations (2.50).				
4/21/2015 203009	Richard Noh WORK Update master translation tracking list with recent translations (1.50); save and organize new informal translations (1.00); email correspondence with translation company regarding revisions to translations (1.30); phone conference with translation company regarding the same (0.50); proofread draft translation per the request of S. Kim-Helms (0.60).	145.00	4.90	710.50	Billable
4/22/2015 202992	Shinae Kim-Helms WORK Receive and review requests [redacted] to revise [redacted] translations (1.60); e-mails with N. Cihlar regarding same (0.40); e-mails with J. Choi and J. Jeong regarding new assignments (0.20); assign proofreading draft translation (2.00); prepare informal translation of LGC personnel document (1.60); e-mails with N. Cihlar and R. Noh regarding status of certified translations from second batch of documents (0.40); review and revise revision to LGC draft translation of org chart prepared by R. Noh (2.80).	425.00	9.00	3,825.00	Billable
4/22/2015 203010	Richard Noh WORK Update master translation tracking list with recent translations (1.20); proofread draft translation per the request of S. Kim-Helms (0.80); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.50); email correspondence with translation company regarding revisions to translations (0.50).	145.00	3.50	507.50	Billable
4/23/2015 202993	Shinae Kim-Helms WORK Compare two versions of information translations [redacted] prepared by DPPs and IPPs (1.80); combine two versions and prepare list of differing translations (1.60); e-mails with DPPs regarding same (0.40); e-mails with J. Choi and J. Jeong regarding new assignments (0.40); e-mails with J. Choi regarding informal translation of LGC personnel document (0.40); join weekly managers teleconference, led by R. Spiegel, to discuss status of translations and other case-related issues (0.50); emails with Japanese language review team regarding status of assignments (0.50); e-mails with R. Spiegel regarding proofreading SDI translations (0.40); prepare list of SDI translations (2.00).	425.00	8.00	3,400.00	Billable
4/23/2015 203011	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.50).	145.00	3.50	507.50	Billable
4/24/2015 202994	Shinae Kim-Helms WORK Review and compile NECB translations prepared by Japanese language reviewers (3.60); e-mails with R. Noh regarding circulating finalized certified translations to DPPs and IPPs (0.40); e-mails with R. Spiegel and N. Cihlar regarding proofreading SDI translations (0.40); assign to J. Jeong and J. Choi translations to proofread (0.50); e-mails with R. Spiegel regarding same (0.40); e-mails with DPPs and H. Rim regarding proofreading SDI translations (0.80); e-mails with R. Noh regarding status of SDI certified translations (0.40); teleconference with N. Cihlar regarding case updates, translations status of SDI documents and other related issues (0.50); review and revise informal translations [redacted] (2.00); e-mail to A. Kikuchi regarding differing translations by DPPs and IPPs (0.50).	425.00	9.50	4,037.50	Billable
4/24/2015 203012	Richard Noh WORK Update master translation tracking list with recent translations (1.20); save and organize new informal translations (1.00); organize and circulate new certified translations per the request of N. Cihlar (0.50); review certified translations for formatting accuracy (1.00).	145.00	3.70	536.50	Billable
4/27/2015 202995	Shinae Kim-Helms WORK Review revision to SDI translation prepared by J. Choi (1.60); e-mails with J. Choi regarding same (0.40); compile informal translations prepared by IPPs foreign language review team (3.00); circulate same [redacted] (0.40); review and revise informal translations [redacted] (1.60).	425.00	7.00	2,975.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/27/2015 203013	Richard Noh WORK Update master translation tracking list with recent translations (0.30); save and organize new informal translations (0.50); review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding revisions to translations (0.20).	145.00	1.40	203.00	Billable
4/27/2015 203349	Megan Day WORK [redacted]	145.00	1.00	145.00	Billable
4/28/2015 203111	Richard Noh WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10).	145.00	1.00	145.00	Billable
4/28/2015 203120	Shinae Kim-Helms WORK Receive review DPPs list of names to be revised in SDI certified translations (1.20); e-mails with H. Rim regarding same (0.40); e-mails with N. Cihlar regarding same (0.40); review documents requested for translation by B. Troxel (2.00); e-mails with N. Cihlar and R. Noh regarding same (0.40); review revised translations for [redacted] files prepared by A. Kikuchi (1.60); e-mails with A. Kikuchi regarding same (0.40); review revision to SDI certified translation prepared by J. Jeong (1.60); e-mails with T. Lee regarding omitted translations (0.20).	425.00	8.20	3,485.00	Billable
4/29/2015 203121	Shinae Kim-Helms WORK Review revisions to SDI certified translations prepared by J. Choi (3.00); provide J. Choi with comments and answers to questions (0.80); revise informal translations of [redacted] files per A. Kikuchis recommendations (2.50); circulate updated translations to DPPs [redacted] (0.20); e-mails with A. Kikuchi regarding translation of Japanese term (0.60); assign more SDI translations for proofreading to J. Choi and J. Jeong (0.40).	425.00	7.50	3,187.50	Billable
4/30/2015 203116	Richard Noh WORK Update master translation tracking list with recent translations (1.30); save and organize new informal translations (1.20); email correspondence with translation company regarding revisions to translations (0.80); assist N. Cihlar with class representative research (1.20).	145.00	4.50	652.50	Billable
4/30/2015 203122	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding code language used in LGC documents (0.40); e-mails with S. Scarlett regarding search terms (0.40); teleconference with H. Rim regarding same (0.50); join weekly managers conference call, led by R. Spiegel, to receive updates on document review- related projects (0.90); e-mails with H. Rim regarding search terms (0.40); review search terms initially proposed by IPPs, responses by LGE, and IPPs second responses (1.40).	425.00	4.00	1,700.00	Billable
5/1/2015 203118	Richard Noh WORK Update master translation tracking list with recent translations (0.30); save and organize new informal translations (0.40); organize and circulate new certified translations per the request of N. Cihlar (0.20).	145.00	0.90	130.50	Billable
5/1/2015 203124	Shinae Kim-Helms WORK E-mails with Japanese language review team regarding their status of assignments (0.50); e-mails with J. Choi regarding proofreading of SDI translations (0.70); search for Apple batteries regarding ascertainability (1.50); search database for battery model numbers provided by clients (2.00); e-mails with N. Cihlar regarding same (0.40); e-mails with N. Cihlar regarding search term chart (0.50); e- mails with N. Cihlar regarding revisions to SDI translations (0.40); e-mail to R. Noh regarding instructions to Consortra to correct errors found in SDI translations (0.40); e-mails with S. Scarlett regarding search terms (0.50); revise search terms to be proposed to LGE per S. Scarlett (1.50).	425.00	8.40	3,570.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/4/2015 203119	Richard Noh WORK Update master translation tracking list with recent translations (0.70); save and organize new informal translations (0.60).	145.00	1.30	188.50	Billable
5/4/2015 203125	Shinae Kim-Helms WORK Review and compile informal translations [redacted] prepared by foreign language review team (2.00); circulate same to DPPs and experts (0.40); e-mails [redacted] regarding more translation requests (0.40); e-mails with R. Spiegel and N. Cihlar regarding Catalyst admin training call (0.60); assign more documents to proofread to J. Choi (0.50); e-mails with DPPs regarding translation status of [redacted] files (0.40); review revisions to SDI translations prepared by J. Choi (2.50).	425.00	6.80	2,890.00	Billable
5/5/2015 203395	Richard Noh WORK Update master translation tracking list with recent translations (0.90); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.80); assist N. Cihlar with class representative research (0.50).	145.00	2.50	362.50	Billable
5/5/2015 203463	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding administrative training call for Catalyst (0.40); e-mails with R. Noh regarding SDI translations to be corrected (0.40); e-mails with R. Noh regarding formatting of LGC certified translation (0.40); conduct research on Apple batteries per N. Cihlar (1.50); review and revise revisions to SDI translations prepared by J. Choi (2.50); proofread SDI translations and prepare revisions to same (1.90); e-mails with N. Ahuja regarding translation requests and new production (0.40).	425.00	7.50	3,187.50	Billable
5/6/2015 203396	Richard Noh WORK Update master translation tracking list with recent translations (1.10); save and organize new informal translations (0.30); email correspondence with translation company regarding revisions to translations (0.20); update translation status per the request of S. Kim-Helms (0.40).	145.00	2.00	290.00	Billable
5/6/2015 203464	Shinae Kim-Helms WORK Review and compile informal translations prepared by Japanese review team (1.60); e-mails with R. Noh regarding formatting of certified translations (0.40); e-mails with R. Noh regarding translations status of documents identified in SDI interrogatory responses (0.40); e-mails with A. Elder regarding Japanese names appearing in Cast of Characters (0.40); assign more documents to translate to J. Choi and J. Jeong (0.40); e-mails with R. Spiegel regarding translating documents identified in SDI interrogatory responses (0.40); review DPPs list of incorrect spellings of individual names to be corrected in translations (0.90); combine said list with H. Rims chart (1.00); e-mails with H. Rim regarding same (0.40); e-mails with DPPs regarding same (0.40); proofread SDI translations and prepare revisions to same (2.00).	425.00	8.30	3,527.50	Billable
5/7/2015 203398	Richard Noh WORK Update master translation tracking list with recent translations (1.20); save and organize new informal translations (0.30); email correspondence with translation company regarding revisions to translations (0.20); prepare foreign documents for translation request (1.00); update translation status per the request of S. Kim-Helms (0.10); conference call regarding discovery (0.20).	145.00	3.00	435.00	Billable
5/7/2015 203465	Shinae Kim-Helms WORK Join managers weekly teleconference led by R. Spiegel to discuss status of document review and other related issues (0.90); join administrative Catalyst training (0.40); e-mails with J. Moy regarding informal translation of LGC document (0.40); e-mails with N. Cihlar regarding current status of foreign language review teams assignments (0.90); review SDI documents identified in SDI interrogatory responses (0.90); e-mails with V. Glaze and R. Spiegel regarding informal translations to be prepared for documents identified in SDI interrogatory responses (1.60); teleconference with N. Cihlar regarding same (0.50); proofread SDI translations and prepare revisions to same (1.60).	425.00	7.20	3,060.00	Billable
5/8/2015 203399	Richard Noh WORK Update master translation tracking list with recent translations (0.40); save and organize new	145.00	1.70	246.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	informal translations (0.30); prepare foreign documents for translation request (0.80); email correspondence with translation company regarding the same (0.20).				
5/8/2015 203467	Shinae Kim-Helms WORK E-mails with S. Nozaki regarding status of translation assignments (0.40); review and revise informal translations prepared by J. Choi (3.00); e-mails with J. Choi regarding translation of technical terms (0.50); e-mails with R. Noh regarding sending revisions to SDI translations to translation company (0.80); prepare informal translation of SDI document (3.60).	425.00	8.30	3,527.50	Billable
5/11/2015 203400	Richard Noh WORK Update master translation tracking list with recent translations (1.80); save and organize new informal translations (0.50).	145.00	2.30	333.50	Billable
5/11/2015 203468	Shinae Kim-Helms WORK E-mails with C. Nishimura and S. Nozaki regarding viewing issues in Hitachi production (0.40); e-mails with B. Troxel regarding same (0.40); review said Hitachi production (0.90); review e-mails from translation company regarding revisions to translations (0.40); e-mails with R. Noh regarding same (0.40).	425.00	2.50	1,062.50	Billable
5/12/2015 203469	Shinae Kim-Helms WORK E-mails with co-counsel regarding SDI production issue (0.40); prepare translation of SDI document (1.60); e-mails with J. Jeong regarding translation of [redacted] (0.40); e-mails with N. Ahuja regarding partial translation of [redacted] documents (0.40); e-mails with H. Hsu regarding same (0.40); prepare translation teams status per N. Cihlar (0.80); e-mails with B. Troxel regarding incomplete document uploaded in database (0.40); e-mails with Japanese language review team regarding same (0.20); compile informal translations prepared by IPPs translation team and circulate same to DPPs [redacted] (0.50); review changes proposed to current coding menu by R. Spiegel (0.50); prepare proposal to same (0.50); conference with N. Cihlar regarding same (0.20).	425.00	6.30	2,677.50	Billable
5/13/2015 203404	Richard Noh WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20).	145.00	1.00	145.00	Billable
5/13/2015 203471	Shinae Kim-Helms WORK E-mails with A. Kikuchi to discuss cooperating translation assignments with DPPs (0.80); e-mails with N. Ahuja regarding additional translations for transactional data (0.50); prepare informal translation SDI document (4.80); e-mails with H. Hsu regarding translation of Chinese terms appearing in SDI documents (0.40); e-mails with C. Hammarskjold and J. Moy regarding informal translation of LGC [redacted] (0.50); e-mails with J. Jeong regarding translation of Chinese characters appearing in SDI documents (0.40); e-mails with J. Choi regarding translation assignment (0.40).	425.00	7.80	3,315.00	Billable
5/14/2015 203405	Richard Noh WORK Update master translation tracking list with recent translations (2.00); save and organize new informal translations (0.70); email correspondence with translation company regarding revisions to translations (0.30).	145.00	3.00	435.00	Billable
5/14/2015 203472	Shinae Kim-Helms WORK E-mails with J. Choi regarding status of assignments (0.80); join managers weekly teleconference, led by R. Spiegel, to discuss updates on document review process, production, translation and other related issues (1.00); review and revise informal translations prepared by Korean language review team (3.00); confer with R. Noh regarding translation status (0.50); prepare informal translation of SDI documents (0.80).	425.00	6.10	2,592.50	Billable
5/15/2015 203406	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (0.50); email correspondence with translation company regarding revisions to	145.00	2.00	290.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translations (0.20); review certified translations for formatting accuracy (0.30).				
5/15/2015 203473	Shinae Kim-Helms WORK Review and compile informal translations prepared by Japanese language review team (1.60); e-mails with R. Nozaki regarding same (0.40); continue to prepare translation of SDI documents (2.00); prepare short-form coding manual for reviewers per R. Spiegel (1.50).	425.00	5.50	2,337.50	Billable
5/18/2015 203407	Richard Noh WORK Update master translation tracking list with recent translations (2.40); save and organize new informal translations (1.80); email correspondence with translation company regarding revisions to translations; review certified translations for formatting accuracy (0.20); update translation status per the request of S. Kim-Helms (0.80).	145.00	5.20	754.00	Billable
5/18/2015 203474	Shinae Kim-Helms WORK Review and revise informal translations and revisions to certified translations prepared by Korean language review team (2.10); e-mails with Korean language review team regarding same (0.60); e-mails with Japanese language review team regarding formatting of informal translations (0.50); e-mails with A. Kikuchi to cooperate translation assignments with DPPs (0.40); review and compile informal translations prepared by Korean, Japanese and Chinese language review teams (2.60); circulate same to DPPs [redacted] (0.30); e-mails with R. Noh regarding formatting of certified translations (0.40); e-mails with N. Cihlar regarding short-form coding manual (0.40); select and review examples of hot documents by issue (1.20); compile same and add emphases and explanations of each issue for reviewers (0.50); prepare compilation of hot document examples per R. Spiegel (0.50).	425.00	9.50	4,037.50	Billable
5/18/2015 203515	Anna Gooding WORK Update master tracking list with recent translations (1.00); review certified translations for formatting accuracy per request of N. Cihlar (1.00).	145.00	2.00	290.00	Billable
5/19/2015 203475	Shinae Kim-Helms WORK E-mails with S. Nozaki regarding status of translation assignment (0.40); prepare summary of foreign language review teams translation status per N. Cihlar (1.60); e-mails with N. Cihlar regarding compilation of hot document examples by issue (0.50); search for more hot document examples (2.00); revise said compilation (1.60); forward same to R. Spiegel (0.20); circulate informal translations [redacted] (0.20); proofread SDI translations (0.50).	425.00	7.00	2,975.00	Billable
5/19/2015 203517	Anna Gooding WORK Update master translation tracking list with recent translations (0.70); review certified translations for formatting accuracy per request of N. Cihlar (0.50).	145.00	1.20	174.00	Billable
5/20/2015 203477	Shinae Kim-Helms WORK E-mails with J. Choi and J. Jeong regarding translation of Chinese characters in Korean documents (0.40); assign more documents for translation to J. Choi (0.40); review and revise informal translations prepared by Korean language review team (1.60); proofread SDI translations (2.10).	425.00	4.50	1,912.50	Billable
5/20/2015 203484	Richard Noh WORK Update master translation tracking list with recent translations (1.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (3.20); email correspondence with translation company regarding the same (0.20).	145.00	5.00	725.00	Billable
5/20/2015 203518	Anna Gooding WORK Update master translation tracking list with recent translations per request of N. Cihlar.	145.00	0.70	101.50	Billable
5/21/2015 203479	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding foreign language teams translation status and other related	425.00	8.80	3,740.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	issues (0.40); join managers weekly teleconference to discuss status of document production, coding and other related issues (0.90); teleconference with R. Spiegel regarding staffing Korean language reviewer (0.70); e-mails with R. Spiegel, D. Lambrinos and L. Chan regarding potential LGC deponents and LGCs tranche 1 custodian files (0.80); e-mails with D. Lambrinos regarding review of tranche 1 custodian files (0.40); review background memos of tranche 1 custodians (2.00); e-mails with J. Choi regarding translation style in preparing informal translation (0.40); brief review of LGCs tranche 1 custodian files (0.50); e-mails with H. Hsu regarding transliteration of names of restaurants and cities in China (0.40); e-mails with J. Jeong regarding translation of certain Korean terms in SDI documents (0.40); search for and review documents relating to MH Kim of LGC in database (1.10); review MH Kim background memo (0.40); revise and update same with additional information (0.40).				
5/21/2015 203487	Richard Noh WORK Update master translation tracking list with recent translations (1.20); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.50).	145.00	3.00	435.00	Billable
5/22/2015 203480	Shinae Kim-Helms WORK E-mails with R. Spiegel re: priority of assignments (0.40); search for and review documents relating to MH Kim of LGC in database (2.00); teleconference with R. Spiegel, L. Chan, D. Lambrinos and M. Pilotin to discuss review of LGCs tranche 1 custodians and evaluation of said documents (0.70); search for LGCs expense reports in database per D. Lambrinos (2.00); e-mails with D. Lambrinos regarding LGC expense reports (0.40); review LGC expense reports (0.30); search for Toshiba expense reports (0.50); e-mail with D. Lambrinos regarding same (0.40); review LGCs potential deponents hot document index circulated by R. Spiegel (0.50); e-mails with J. Choi regarding additional assignments (0.40); e-mail same with R. Spiegel (0.40); search for and review documents relating to JW Huh of LGC in database (0.40); review JW Huh background memo (0.30); revise and update same with additional information (0.40).	425.00	9.10	3,867.50	Billable
5/22/2015 203520	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); review certified translations for formatting accuracy per request of N. Cihlar (0.30).	145.00	0.70	101.50	Billable
5/26/2015 203488	Richard Noh WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.40).	145.00	2.70	391.50	Billable
5/26/2015 203526	Shinae Kim-Helms WORK Review and revise informal translations of SDI documents identified in SDIs interrogatory responses (1.60); circulate same to DPPs (0.20); e-mails with R. Noh regarding formatting of certified translations (0.40); e-mails with R. Spiegel and J. Moy regarding availability of Chinese language reviewer (0.90); assign more documents to J. Choi (0.40); search database for conspiratorial documents implicating YW Chung and JW Huh (1.10); review same (0.90); revise background memos for YW Chung and JW Huh based on information gathered from searches (1.60); prepare list of hot documents (1.60).	425.00	8.70	3,697.50	Billable
5/27/2015 203491	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (1.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.30); prepare foreign documents for translation request (1.20).	145.00	5.00	725.00	Billable
5/27/2015 203522	Anna Gooding WORK Update master tracking list with recent translations per request of N. Cihlar (2.30).	145.00	2.30	333.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/27/2015 203527	Shinae Kim-Helms WORK E-mails with C. Nishimura regarding informal translation assignment (0.40); e-mails with A. Kikuchi regarding replacement copy of Toshiba production (0.40); e-mail to B. Troxel regarding same (0.40); e-mails with DPPs regarding informal translations prepared by IPPs (1.60); search database for conspiratorial documents implicating YW Chung and JW Huh (1.90); review same (0.90); revise background memos for YW Chung and JW Huh based on information gathered from searches (1.60); prepare list of hot documents (1.60).	425.00	8.80	3,740.00	Billable
5/28/2015 203493	Richard Noh WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.50); update case files with hot document tables per the request of S. Kim-Helms (0.50).	145.00	4.00	580.00	Billable
5/28/2015 203528	Shinae Kim-Helms WORK Review and revise YW Chung and JW Huh additional hot document list (1.60); circulate same to R. Spiegel, D. Lambrinos and L. Chan (0.30); E-mails with Japanese language review team regarding additional translation assignments (0.90); join weekly managers teleconference, led by R. Spiegel, to discuss changes to coding pane, translation status, deposition preparation process, and other related issues (0.50); e-mails with R. Spiegel regarding assignments to Korean language review team and hot Korean language documents recently identified (0.90); search database for expense reports produced by all Defendants (1.50); review searched documents (1.00); prepare list of expense reports from searches (1.60); teleconference with N. Cihlar regarding foreign language review teams status and overall assessment of documents produced by LGC (0.90).	425.00	9.20	3,910.00	Billable
5/29/2015 203495	Richard Noh WORK Update master translation tracking list with recent translations (1.00); update translation status per the request of S. Kim-Helms(1.00); update case files with hot document tables per the request of S.Kim-Helms (1.00); organize and send recently certified translations per the request of S. Kim-Helms (1.00).	145.00	4.00	580.00	Billable
5/29/2015 203529	Shinae Kim-Helms WORK Search database for expense reports produced by all Defendants (2.10); review searched documents (1.00); prepare list of expense reports from searches (1.60); e-mails with D. Lambrinos regarding same (0.40); e-mails with D. Lambrinos regarding translation status of JW Huh and YW Chung hot documents (0.40).	425.00	5.50	2,337.50	Billable
5/29/2015 203606	Nathan Cihlar WORK Review and analysis of potential expense reports found in Catalyst (0.50); teleconference with S.Kim-Helms regarding the same (0.30); analysis of proposed documents for certification suggested by D.Lambrinos and S. Kim-Helms (0.30).	350.00	1.10	385.00	Billable
6/1/2015 203496	Richard Noh WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50); prepare foreign documents for translation request (1.00); organize and send recently certified translations per the request of S. Kim-Helms (0.50).	145.00	3.00	435.00	Billable
6/1/2015 203525	Anna Gooding WORK Locate foreign original documents for translations per request of N. Cihlar.	145.00	1.00	145.00	Billable
6/1/2015 203530	Shinae Kim-Helms WORK Receive and review documents identified by D. Lambrinos for translations (0.90); evaluate documents for importance, near duplicates and translation status (1.60); e-mails with R. Spiegel regarding availability of Japanese language reviewers (0.90); e-mails with C. Nishimura regarding informal translations status (0.40); e-mails with R. Spiegel regarding status of Korean language reviewers (0.40); e-mails with N. Cihlar regarding documents for certified translations (0.40); e- mails with DPPs regarding list of documents for certified translations (0.40); e-mails with R. Noh regarding	425.00	9.00	3,825.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	recently finalized certified translations to be circulated (0.40); assign more documents for translation to J. Jeong (0.40); review revisions to SDI certified translations prepared by J. Choi (2.80); e-mails with J. Choi regarding same (0.40).				
6/2/2015 204133	Shinae Kim-Helms WORK Review and compile informal translations prepared by Japanese language review team (1.60); e-mail foreign language review teams status to N. Cihlar (0.50); review Next Wave Planning and Search Worksheet forwarded by R. Spiegel (1.00); search for basic background information of each person listed in said chart in database (0.50); revise said chart based on search results (1.60).	425.00	5.20	2,210.00	Billable
6/2/2015 204203	Richard Noh WORK Update master translation tracking list with recent translations (2.00); save and organize new informal translations (0.60); email correspondence with translation company regarding revisions to translations (0.30); prepare foreign documents for translation request (1.80); email correspondence with translation company regarding the same (0.30).	145.00	5.00	725.00	Billable
6/3/2015 204134	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding evaluation of JW Huhs hot documents (0.40); review and analyze JW Huh hot documents (1.60); e-mails with DPPs regarding foreign language documents for translation (0.40); e-mails with D. Lambrinos regarding documents for translation (0.40); assign Korean language review team documents for translation (0.90); continue to review Next Wave Planning and Search Worksheet forwarded by R. Spiegel (0.90); search for basic background information of each person listed in said chart in database (1.80); revise said chart based on search results (1.60).	425.00	8.00	3,400.00	Billable
6/3/2015 204204	Richard Noh WORK Update master translation tracking list with recent translations (1.20); save and organize new informal translations (1.80); email correspondence with translation company regarding revisions to translations (0.70).	145.00	3.70	536.50	Billable
6/3/2015 204344	Anna Gooding WORK Update master tracking list with recent translations per request of N. Cihlar.	145.00	0.70	101.50	Billable
6/3/2015 215590	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding analysis of hot documents related to JW Huh.	350.00	0.40	140.00	Billable
6/4/2015 204135	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding LGC-Sony connections and documents related (0.40); e-mails with R. Noh regarding format of certified translation of native file (0.40); e-mails with D. Lambrinos regarding documents for certified translation (0.40); review master document index for DW Lee (0.50); e-mails with D. Lambrinos regarding same (0.40); join managers weekly teleconference, led by R. Spiegel, to discuss document production status, document review status, translation status and other related issues (0.90); continue to review Next Wave Planning and Search Worksheet forwarded by R. Spiegel (0.90); search for basic background information of each person listed in said chart in database (1.80); revise said chart based on search results (2.10).	425.00	7.80	3,315.00	Billable
6/4/2015 204205	Richard Noh WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding the same (0.20); prepare foreign documents for translation request (0.80).	145.00	2.00	290.00	Billable
6/5/2015 204136	Shinae Kim-Helms WORK E-mails with V. Glaze regarding urgent translation requests (0.40); e-mails with N. Cihlar regarding same (0.40); e-mails with D. Lambrinos regarding LGC expense report to be informally translated (0.40); e-mails with Korean language review team regarding same (0.40); continue to review Next Wave Planning and Search Worksheet forwarded by R. Spiegel (1.90); search for basic background information of each person listed in said chart in database (1.00); revise said chart based on search	425.00	8.90	3,782.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	results (1.60); review and revise revisions to SDI documents translations prepared by J. Jeong (1.60); e-mails with J. Moy and V. Glaze regarding urgent translation requests (0.40); assess documents requested for translations (0.40); e-mails with D. Lambrinos regarding DW Lee hot documents (0.40).				
6/5/2015 204206	Richard Noh WORK Update master translation tracking list with recent translations (1.60); organize and send recently certified translations per the request of S. Kim-Helms (0.70); email correspondence with translation company regarding revisions to translations (0.20).	145.00	2.50	362.50	Billable
6/7/2015 204137	Shinae Kim-Helms WORK Continue to review Next Wave Planning and Search Worksheet forwarded by R. Spiegel (1.30); search for basic background information of each person listed in said chart in database (2.80); revise said chart based on search results (1.60).	425.00	5.70	2,422.50	Billable
6/8/2015 204138	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding [redacted] hot documents for certified translation (0.40); review list of documents for translation requested by D. Lambrinos (0.70); evaluate said documents in database (0.50); review e-mails from DPPs regarding assessment of 6 documents that IPPs proposed to certify (0.50); [redacted] (0.90); search database [redacted] (1.80); review and analyze said documents (1.50); prepare [redacted] (0.40).	425.00	6.70	2,847.50	Billable
6/8/2015 204208	Richard Noh WORK Update master translation tracking list with recent translations (0.50); update translation status per the request of S. Kim-Helms (0.40); prepare foreign documents for translation request (1.80); organize and send recently certified translations per the request of S. Kim-Helms (1.80).	145.00	4.50	652.50	Billable
6/9/2015 204139	Shinae Kim-Helms WORK Review and revise informal translation prepared by J. Choi (0.50); review email from J. Moy regarding documents IPPs proposed for certified translation (0.90); e-mails with D. Lambrinos regarding same (0.30); e-mails with R. Spiegel regarding assignments for Korean language review team (0.40); assign and manage projects to Korean language review team (0.70); compile informal translations prepared by Japanese language review team (0.80); circulate same to experts and DPPs (0.20); prepare rough translation of LGC document (1.60); e-mail with D. Lambrinos regarding same (0.10).	425.00	5.50	2,337.50	Billable
6/10/2015 204140	Shinae Kim-Helms WORK E- mails with R. Noh regarding documents requested for certified translations and status thereof (0.40); e-mails with N. Cihlar regarding dividing draft translations to check with DPPs (1.60); e-mails to DPPs regarding documents that IPPs propose for certified translation (0.40); e-mails with V. Glaze regarding draft translations of Korean documents to proofread (1.60); send translation related reminder to R. Noh (0.40); e-mails with R. Noh regarding same (0.40); review and revise revisions to draft translations prepared by J. Choi (1.80).	425.00	6.60	2,805.00	Billable
6/10/2015 204209	Richard Noh WORK Update master translation tracking list with recent translations (0.20); save and organize new informal translations (0.10); email correspondence with translation company regarding revisions to translations (0.20); prepare foreign documents for translation request (0.50); email correspondence with translation company regarding the same (0.20); organize and send recently certified translations per the request of S.Kim-Helms (0.80).	145.00	2.00	290.00	Billable
6/10/2015 204349	Anna Gooding WORK Update master tracking list with recent translations per request of N. Cihlar.	145.00	1.00	145.00	Billable
6/11/2015 204141	Shinae Kim-Helms WORK Analyze documents requested by DPPs for translations (3.10); e-mail to DPPs analysis and explanation of documents requested for certified translations (0.40); join document review managers	425.00	6.40	2,720.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	weekly teleconference to discuss updates on document production/review and translation status (0.90); teleconference with N. Cihlar regarding translation status (0.50); teleconference with R. Noh regarding same (0.50); e-mails with R. Noh regarding format of certified translations (0.40); e-mails with J. Moy and V. Glaze regarding revisions to draft translations and other translation related matters (0.60).				
6/11/2015 204210	Richard Noh WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.40); organize and send recently certified translations per the request of S. Kim-Helms (0.10).	145.00	3.00	435.00	Billable
6/12/2015 204142	Shinae Kim-Helms WORK Review and analyze documents for translation requested by DPPs (1.60); e-mails with N. Cihlar and R. Spiegel regarding same (0.40); perform searches in database for documents similar to documents requested for translation by DPPs (0.40); teleconference with N. Cihlar regarding preparing revisions to draft informal translations prepared by DPPs (1.60); [redacted] (0.40) e-mails with J. Moy regarding estimated date to finalize requested certified translations (0.40); e-mails with R. Noh regarding same (0.40); e-mails with R. Spiegel regarding preparing list of documents for translation in preparation for response to Toshibas motion for summary judgment (0.40); revise informal translation prepared by DPPs (1.60); e-mails with J. Moy regarding same (0.40); review DPPs second revision (0.90); e-mails with N. Cihlar regarding revisions to Toshiba informal translations (0.40).	425.00	8.90	3,782.50	Billable
6/12/2015 204211	Richard Noh WORK Update master translation tracking list with recent translations (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same(0.30); organize and send recently certified translations per the request of S. Kim-Helms (0.70).	145.00	3.00	435.00	Billable
6/12/2015 204336	Nathan Cihlar WORK Review and analysis of translations of documents related to [redacted] (1.40); analysis of documents proposed for certification by DPPs (0.80); propose edits to informal translations suggested by DPPs (0.50); teleconference with S. Kim-Helms regarding same (0.20).	350.00	2.90	1,015.00	Billable
6/15/2015 204143	Shinae Kim-Helms WORK E-mails with N. Ahuja regarding translation of [redacted] (0.40); e-mails with R. Noh regarding translation requests to be sent out (0.40); review documents listed in Toshiba hot document index (3.20); review said documents in database (2.50); select documents for certified translation in preparation for response to Toshibas motion for summary judgment per R. Spiegel (2.20).	425.00	8.70	3,697.50	Billable
6/15/2015 204212	Richard Noh WORK Update master translation tracking list with recent translations (0.50); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20); prepare foreign documents for translation request (1.00); email correspondence with translation company regarding the same (0.30).	145.00	3.00	435.00	Billable
6/16/2015 204144	Shinae Kim-Helms WORK E-mails with R. Noh regarding status of certified translations and translation tracking chart (0.60); e-mails with J. Choi and R. Spiegel regarding assignments for J. Jeong and her availability (0.60); e-mails with R. Spiegel regarding availability of Japanese language reviewer for translation of transactional data (0.80); e-mails with C. Nishimura regarding same (0.60); revise and review list of documents for translation in preparation for response to Toshibas motion for summary judgement (4.90); circulate same to co-counsel (0.30); e-mails with J. Moy regarding [redacted] (0.60).	425.00	8.40	3,570.00	Billable
6/16/2015 204353	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with	145.00	1.20	174.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20).				
6/16/2015 205842	Richard Noh WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation request (1.00); email correspondence with translation company regarding the same (0.40); update translation status per the request of S. Kim-Helms (0.80); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.50); organize and send recently certified translations per the request of S. Kim-Helms (0.60).	145.00	5.50	797.50	Billable
6/17/2015 204145	Shinae Kim-Helms WORK E-mails with A. Gooding regarding certified translation process (0.70); e-mails with A. Kikuchi of DPPs regarding coordinate on translation of transactional data files (0.80); join reviewers training call run by Catalyst manager and R. Spiegel (1.50); e- mails with R. Spiegel and N. Cihlar to discuss collecting evidence in preparation for upcoming depositions (1.20); review and compile informal translations prepared by foreign language review team (2.80); circulate same to DPPs and IPPs translation management teams (0.80).	425.00	7.80	3,315.00	Billable
6/18/2015 204146	Shinae Kim-Helms WORK Review informal translations prepared by J. Choi (2.80); e-mails with J. Choi regarding translation of Korean phrases in LGC documents (1.00); review e-mails drafted by A. Gooding to Consortra (0.90); e-mails with A. Gooding regarding same (0.60); join document managers weekly teleconference, led by R. Spiegel, to discuss production status, deposition schedule and translation related issues (1.20); teleconference with A. Gooding regarding translation-related issues (1.00).	425.00	7.50	3,187.50	Billable
6/18/2015 204357	Anna Gooding WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.30); email correspondence with translation company regarding the same (0.50).	145.00	4.00	580.00	Billable
6/18/2015 215584	Nathan Cihlar WORK Review and analysis of hot documents related [redacted]	350.00	2.00	700.00	Billable
6/19/2015 204147	Shinae Kim-Helms WORK Review e-mails drafted by A. Gooding to Consortra (0.40); e-mails with A. Gooding regarding same (0.40); e-mails with A. Kikuchi regarding translation status of NEC transactional data (0.40); review draft emails to Consortra prepared by A. Gooding (0.20); e-mails with A. Gooding regarding same (0.40); e-mails with DPPs regarding proofreading draft translations recently prepared (0.20); e-mails with S. Nagano [redacted] (0.40); e-mails with J. Choi regarding summary translation assignments (0.40); review informal and summary translations prepared by J. Choi (1.00); prepare revision to draft translation (0.60); e-mails with J. Choi regarding same (0.40); run searches for documents related to [redacted] (1.00); review documents (0.50); [redacted] (2.70).	425.00	9.00	3,825.00	Billable
6/19/2015 204359	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.30); email correspondence with translation company regarding the same (0.10).	145.00	2.00	290.00	Billable
6/22/2015 204148	Shinae Kim-Helms WORK E-mails with M. Perona regarding requests to correct errors in certain informal translations (0.30); e-mails with co-counsel regarding search strategies (0.20).	425.00	0.50	212.50	Billable
6/23/2015 204196	Shinae Kim-Helms WORK [redacted] (0.80); e-mails with J.	425.00	9.10	3,867.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Choi and A. Elder regarding draft translation to proofread (1.60); e-mails with C. Nishimura and H. Hsu regarding informal translations requested by experts (0.40); e-mails with A. Kikuchi regarding NEC transactional data translation status (0.40); e-mails with R. Noh regarding certified translations in progress (0.40); join weekly reviewers calls, led by R. Spiegel, to receive new instructions in coding and other related issues (0.90); join call with R. Spiegel, H. Rim, J. Choi, K. Jones to discuss search strategies in preparation for upcoming depositions (0.80); search database for documents relevant for [redacted] (2.20); prepare [redacted] memorandum (1.30); circulate same to co-counsel (0.30).				
6/23/2015 Richard Noh 204275 WORK	Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (2.00); organize and send recently certified translations per the request of S. Kim-Helms (0.70).	145.00	4.70	681.50	Billable
6/24/2015 Shinae Kim-Helms 204197 WORK	Review [redacted] documents summarized by S. Nagano (0.90); e-mails with S. Nagano regarding same (0.40); review and further revise revisions to draft translations prepared by J. Choi (1.00); e-mail same to R. Noh (0.40); e-mails with R. Spiegel regarding strategy to review documents for [redacted] (0.70); e-mails with C. Nishimura regarding Japanese transactional data files to be translated (0.40); search for conspiratorial documents [redacted] in database (0.50); review same (0.90); prepare hot document list [redacted] (2.00); review and revise coding and document summary prepared by Y. Rha (0.50).	425.00	7.70	3,272.50	Billable
6/24/2015 Richard Noh 204276 WORK	Update master translation tracking list with recent translations (1.20); save and organize new informal translations (0.80); organize and send recently certified translations per the request of S. Kim-Helms (1.00); phone conference with S. Kim-Helms regarding status of translations (0.50).	145.00	3.50	507.50	Billable
6/25/2015 Shinae Kim-Helms 204198 WORK	E-mails with R. Noh regarding status of translations and information for translation tracking chart (0.40); e-mails with R. Spiegel regarding coding by Y. Rha (0.40); teleconference with Y. Rha regarding same (0.50); search for conspiratorial documents [redacted] (0.50); review same (0.90); prepare hot document list [redacted] (1.00); join managers weekly teleconference to discuss updates in document review, coding changes, and translation status (0.80).	425.00	4.50	1,912.50	Billable
6/25/2015 Richard Noh 204277 WORK	Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy (1.00).	145.00	3.00	435.00	Billable
6/26/2015 Shinae Kim-Helms 204199 WORK	Join Catalyst advanced search training (1.10); search for conspiratorial documents [redacted] (0.80); review same (0.90); prepare hot document list [redacted] (0.90); review comments to T1 reviewers coding by managers (0.60); e-mails with R. Spiegel regarding overall assessment [redacted] in database (0.50).	425.00	4.80	2,040.00	Billable
6/26/2015 Richard Noh 204278 WORK	Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.30); organize and send recently certified translations per the request of S. Kim-Helms (0.40).	145.00	1.00	145.00	Billable
6/29/2015 Shinae Kim-Helms 204200 WORK	E-mails with A. Kikuchi regarding full translation of [redacted] (0.40); teleconference with N. Cihlar regarding case updates, translation status and [redacted] document review summary (1.40); e-mails with A. Niyati and B. Miller regarding Toshiba production (0.40); teleconference with D. Lambrinos, K. Jones, N. Cihlar, H. Rim and B. Glackin to prioritize potential Japanese witnesses (0.50); e-mails with J. Choi regarding format of informal translation (0.40); revise and finalize said informal translation (1.60); compile NEC translations prepared by Japanese	425.00	9.50	4,037.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	language review team (2.00); circulate same to DPPs and IPPs (0.40); review and code documents [redacted] in database (2.40).				
6/29/2015 204279	Richard Noh WORK Update master translation tracking list with recent translations (0.20); save and organize new informal translations (1.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); organize all certified and informal translations per the request of R. Spiegel (2.00).	145.00	4.50	652.50	Billable
6/30/2015 204201	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding preparing deposition set for each deposition (0.50); e-mails with R. Noh regarding transactional data (0.40); e-mails with R. Spiegel regarding preparing deposition set [redacted] (0.40); review and code documents [redacted] in database (6.00); e-mails with R. Noh regarding status of certified translations (0.40).	425.00	7.70	3,272.50	Billable
6/30/2015 204280	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (1.00); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (1.00); organize all certified and informal translations per the request of R. Spiegel (1.00).	145.00	6.00	870.00	Billable
6/30/2015 204341	Nathan Cihlar WORK Review/analysis of translation tracking chart, edits to the same (0.50); meetings with R. Noh regarding updates to tracking chart and incorporation of additional information (0.50); review and analysis of NEC translations prepared by team [redacted] (1.20).	350.00	2.20	770.00	Billable
7/1/2015 204281	Richard Noh WORK Update master translation tracking list with recent translations (0.40); save and organize new informal translations (0.20); phone conference with S. Kim-Helms regarding tagging documents on Catalyst (0.20); tag translations on Catalyst per the request of R. Spiegel (1.20); organize all certified and informal translations per the request of R. Spiegel (3.00).	145.00	5.00	725.00	Billable
7/1/2015 205782	Shinae Kim-Helms WORK Review LGCs Supplemental Response to First Set of Rogs No. 5 (1.50); e-mails with counsel on DPPs side regarding translating Korean documents attached to said Response (0.60); e-mails with R. Spiegel and J. Choi regarding same (0.40); e-mails with R. Noh regarding formatting of native files in finalizing certified translation (0.70); teleconference and e-mails with R. Noh regarding same (0.50); e-mails with S. Nagano regarding search terms to find organizational charts (0.40); search for [redacted] documents in Catalyst and code [redacted] accordingly (4.00).	425.00	8.10	3,442.50	Billable
7/2/2015 204282	Richard Noh WORK Update master translation tracking list with recent translations (2.00); save and organize new informal translations (0.30); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.30); organize and send recently certified translations per the request of S. Kim-Helms (1.20); tag translations on Catalyst per the request of R. Spiegel (0.50).	145.00	5.50	797.50	Billable
7/2/2015 205783	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding duplicate documents sent for certified translation (0.40); review and finalize translation [redacted] (1.60); e-mails with S. Scarlett regarding same (0.40); e-mails with R. Noh regarding bulk editing feature in Catalyst (0.40); e-mails with N. Cihlar regarding translation requests (0.40); join weekly managers teleconference, led by R. Spiegel, to discuss case updates, production updates, document review-related issues, etc (0.90); e-mails with R. Noh regarding translation coding in Catalyst (0.60); search for [redacted] in Catalyst and code [redacted] deposition set accordingly (2.50).	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/3/2015 205784	Shinae Kim-Helms WORK	425.00	0.50	212.50	Billable
	E-mails with T. Lee regarding translation of [redacted] in Korean (0.30); e-mails with N. Cihlar regarding documents requested for certified translation (0.20).				
7/6/2015 204283	Richard Noh WORK	145.00	3.50	507.50	Billable
	Update master translation tracking list with recent translations (0.30); tag translations on Catalyst per the request of R. Spiegel (3.00); update translation status per the request of S. Kim-Helms (0.20).				
7/6/2015 205785	Shinae Kim-Helms WORK	425.00	8.00	3,400.00	Billable
	E-mails with R. Spiegel regarding background memos to be prepared for LGC deponents (1.60); search for [redacted] documents in Catalyst and code [redacted] deposition set accordingly (1.20); e-mails with S. Nagano regarding Japanese names (0.40); review and check translation status of documents requested for translation by experts (0.90); e-mails with R. Noh and C. Nishimura regarding same (0.40); e-mails with S. Nagano regarding Toshiba organization charts (0.40); search database for documents relating to [redacted] information (0.60); review said documents (0.90); prepared Donny Lee background memo based on said review (1.60).				
7/7/2015 205773	Shinae Kim-Helms WORK	425.00	7.60	3,230.00	Billable
	E-mails with Y. Rha regarding rating of LGC documents in batch assigned to her (0.40); e-mails with R. Noh regarding status of CT tagging in Catalyst (0.40); join reviewers weekly call, led by R. Spiegel to discuss coding status and questions related coding (0.70); revise and finalize D. Lee background memo (2.50); circulate same to R. Spiegel and N. Cihlar (0.50); search LGC database and review/code relevant/hot documents (3.10).				
7/7/2015 205778	Richard Noh WORK	145.00	3.50	507.50	Billable
	Update master translation tracking list with recent translations (1.00); save and organize new informal translations (1.00); tag translations on Catalyst per the request of R. Spiegel (1.50).				
7/8/2015 205774	Shinae Kim-Helms WORK	425.00	7.00	2,975.00	Billable
	Review and revise translation of [redacted] prepared by T. Lee (2.50); circulate same to DPPs (0.50); review documents proposed by DPPs for certified translations (1.80); e-mails with R. Spiegel regarding same (0.40); e-mails with R. Noh regarding translation status of same (0.40); e-mails with DPPs regarding Korean companies policies with respect to terminated employees (0.60); e-mails with R. Noh regarding competing versions of translations (0.40); e-mails with Y. Rha regarding coding of LGC documents assigned to her (0.40).				
7/8/2015 205779	Richard Noh WORK	145.00	5.50	797.50	Billable
	Update master translation tracking list with recent translations (1.00); tag translations on Catalyst per the request of R. Spiegel (1.00); update translation request per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (1.00).				
7/9/2015 205775	Shinae Kim-Helms WORK	425.00	7.20	3,060.00	Billable
	E-mails with C. Nishimura regarding translation assignment (0.40); review and compile informal translations prepared by C. Nishimura (0.80); review and revise translation [redacted] (0.80); circulate same to DPPs (0.20); join weekly managers teleconference, run by R. Spiegel, to discuss updates in production, evidence in preparation for response to Toshibas summary judgment motion, and other related issues (0.50); review and analyze LGCs Supplemental Response Set 1 Nos 2-4 and Set 2 No 9 (1.00); select sections of Korean documents to translate contained in said LGCs Supplemental Response Set 2 No 9 (0.20); e-mails with R. Spiegel, D. Lambrinos and DPPs regarding select sections for translation (0.40); review Y. Rhas coding (0.40); e-mails with R. Spiegel regarding same (0.40); e-mails with A. Kikuchi regarding translation status of [redacted] (0.40); e-mails with N. Ahuja regarding hidden sheets in [redacted] (0.40); e-mails with Y. Rha regarding coding of duplicate documents (0.40); e-mails with S. Nagano regarding searching codes field (0.40); teleconference with N. Cihlar regarding foreign language exhibits and certified translations thereof contained in Declarations filed in support of Toshibas Summary Judgment Motion (0.50).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/9/2015 205870	Richard Noh WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); save and organize new certified translations regarding the same (0.30).	145.00	2.50	362.50	Billable
7/10/2015 205776	Shinae Kim-Helms WORK Teleconference with J. Moy regarding use of [redacted] in discovery (0.70); e-mails with R. Noh regarding F. Hogue declaration filed with Toshibas Summary Judgment Motion (0.40); continue to search for hot documents in database (1.50); review and code interesting/hot documents (1.20); report hot documents to R. Spiegel (0.50); e-mails with R. Spiegel regarding coding (0.40); e-mails with J. Choi regarding summary translation of LGC document [redacted] (0.40); e-mails with C. Nishimura regarding status of information translations to prepare (0.40); review and compile informal translations prepared by foreign language review team (1.20); circulate same to DPPs and experts (0.40).	425.00	7.10	3,017.50	Billable
7/10/2015 205780	Richard Noh WORK Update master translation tracking list with recent translations (0.20); save and organize new certified translations regarding the same (0.30).	145.00	0.50	72.50	Billable
7/13/2015 205777	Shinae Kim-Helms WORK E-mails with J. Moy regarding summary translation of [redacted] (0.40); continue to search for hot documents in database (2.10); review and code interesting/hot documents (1.20); report hot documents to R. Spiegel (0.50).	425.00	4.20	1,785.00	Billable
7/13/2015 205781	Richard Noh WORK Update master translation tracking list with recent translations (0.50); save and organize new certified translations regarding the same (0.50).	145.00	1.00	145.00	Billable
7/13/2015 205890	Nathan Cihlar WORK Review and analysis of usefulness of translations used by DPPs for declarations in support of Motions to Dismiss (2.00); meetings with S. Kim-Helms regarding organization and strategy of review of same (0.50).	350.00	2.50	875.00	Billable
7/14/2015 205766	Shinae Kim-Helms WORK Join weekly reviewers teleconference, run by R. Spiegel, to receive updates on coding and discuss coding-related issues (0.50); e-mails with Y. Rha regarding conspiracy tag (0.40); search for potential exhibits for [redacted] in database (1.90); review and code said documents (1.20); run searches for Korean documents to be potentially used for Toshiba deponents [redacted] in database; review said documents (1.50).	425.00	5.50	2,337.50	Billable
7/14/2015 205871	Richard Noh WORK Update master translation tracking list with recent translations (0.30); save and organize new informal translations (0.20); tag translations on Catalyst per the request of R. Spiegel (0.10).	145.00	0.60	87.00	Billable
7/15/2015 205767	Shinae Kim-Helms WORK E-mails with potential candidate for Japanese language reviewer (1.20); search for potential exhibits for [redacted] in database (2.20); review and code said documents (1.80); teleconference with Y. Rha to answer questions related to coding and discuss other related issues (0.60); e-mails with R. Spiegel and Y. Rha regarding Korean documents containing Chinese characters (0.40); circulate list of hot documents newly discovered to R. Spiegel (0.40).	425.00	6.60	2,805.00	Billable
7/15/2015 205872	Richard Noh WORK Update master translation tracking list with recent translations (0.50); save and organize new informal translations (1.0); tag translations on Catalyst per the request of S. Kim-Helms (0.50); update translation status (0.50).	145.00	2.50	362.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/16/2015 205768	Shinae Kim-Helms WORK Teleconference with Y. Rha regarding coding and review of documents assigned to batch (1.20); search for potential exhibits for [redacted] in database (0.50); review and code said documents (1.20); e-mails with Catalyst regarding issues with searching in Korean (0.40); search for documents relating to [redacted] (1.10); prepare [redacted] memorandum based on said review (1.20); review TSB documents in Korean [redacted] (1.20); e-mails with R. Nagano regarding same (0.40).	425.00	7.20	3,060.00	Billable
7/16/2015 205873	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (2.00); email correspondence with translation company regarding revisions to translations (0.50).	145.00	3.50	507.50	Billable
7/17/2015 205769	Shinae Kim-Helms WORK Search for potential exhibits for [redacted] in database (1.60); review and code said documents (1.20); e-mails with R. Spiegel regarding Japanese language reviewer candidate (1.20); continue to search for documents [redacted] (1.50); continue to prepare [redacted] memorandum based on said review (1.20).	425.00	6.70	2,847.50	Billable
7/17/2015 205874	Richard Noh WORK Update master translation tracking list with recent translations save and organize new informal translations (1.70); email correspondence with translation company regarding revisions to translations (0.30).	145.00	2.00	290.00	Billable
7/20/2015 205771	Shinae Kim-Helms WORK Join managers weekly teleconference, run by R. Spiegel, to discuss deposition preparation status and coding related issues (0.50); search for potential exhibits for [redacted] (0.50); review and code said documents (0.50); join managers weekly teleconference, run by R. Spiegel, to discuss preparation for upcoming LGC and Toshiba depositions, staffing issues and other document related issues (0.50); e-mails with J. Moy regarding division of draft translations to proofread (0.50); review and revise summary translation of Korean document in LGCs Supplemental Rog Responses (1.20); circulate said revision to DPPs (0.40); e-mails with Korean language review team to schedule teleconference (0.80); review and compile informal translations prepared by Japanese and Korean language review teams (1.00); circulate same to experts and DPPs (0.30); e-mails with R. Noh regarding certified translation status (0.40).	425.00	6.60	2,805.00	Billable
7/21/2015 205756	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding targeted searches for potential exhibits to be used at upcoming LGC depositions (0.40); teleconference with Korean language review team and R. Spiegel regarding hot document searching, deponent set coding and handling duplicate documents (0.50); join weekly reviewers teleconference, run by R. Spiegel, to discuss coding related issues (0.50); e-mails with M. Pilotin regarding LGC deposition schedules (0.40); e-mails with Catalyst customer service regarding ProducingFamily field in Catalyst (0.40); e-mails with C. Hammarskjold regarding deposing [redacted] (0.40); e-mails with S. Nagano regarding [redacted] (0.40); teleconference with A. Kikuchi regarding translation of transactional data files and other related issues (0.80); e-mails with J. Choi regarding draft translations to proofread (0.40); QC Korean language review team (1.10); e-mails with R. Spiegel regarding same (0.40); draft search terms for potential exhibits for [redacted] (1.00); e-mail same to J. Choi and J. Jeong (0.40).	425.00	7.10	3,017.50	Billable
7/21/2015 205893	Nathan Cihlar WORK Review and analysis of documents proposed by D. Lambrinos for [redacted] (0.40); update CT list with hot documents [redacted] (0.90); emails with D. Lambrinos, S. Kim-Helms, S. Nagano regarding [redacted] depo preparations (0.50).	350.00	1.80	630.00	Billable
7/22/2015 205758	Shinae Kim-Helms WORK Review document selected as potential exhibits for [redacted] (0.80); search for potential duplicate and near duplicates (1.00); e-mail with N. Cihlar and R. Noh regarding same (0.40); e-mails with candidate Japanese language reviewer regarding availability (0.40); conduct	425.00	7.30	3,102.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	author-based searches (1.00); e-mails with S. Nagano regarding Japanese authors appearing in LGC production (0.40); review search terms for documents authored by Donny Lee and YW Chung drafted by R. Spiegel (1.20); modify said search terms (0.50); e-mails with R. Spiegel regarding same (0.40); search database for potential exhibits for YW Chung and Donny Lee (0.80); review and code said documents (0.40).				
7/23/2015 205759	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding searching for documents on master list that need to be coded as deposition sets for YW Chung and Donny Lee (0.40); conduct said searches and code documents accordingly (1.30); join managers weekly teleconference, run by R. Spiegel, to discuss document review status for upcoming depositions and translation status (0.50); e-mails with J. Moy regarding additional LGC production to be reviewed (1.20); e-mails with A. Kikuchi regarding status of informal translations to be prepared by DPPs (0.80); receive and review informal translations prepared by DPPs forwarded by A. Lunzer (0.40); compile and circulate [redacted] (1.80); e-mails with N. Ahuja regarding translations of Korean documents attached to LGCs Supplemental Rog Responses (0.40); search database for potential exhibits for [redacted] (1.00); review and code said documents (0.50).	425.00	8.30	3,527.50	Billable
7/23/2015 205878	Richard Noh WORK Update master translation tracking list with recent translations (0.70); save and organize new informal translations (3.10); tag translations on Catalyst per the request of S. Kim-Helms (1.20).	145.00	5.00	725.00	Billable
7/24/2015 205760	Shinae Kim-Helms WORK Search for more documents related to [redacted] (1.80); finalize [redacted] background memo per said review (1.20); search for potential exhibits for LGC deponents in database (1.80); review and code documents resulted from said searches (1.20); e-mails with R. Spiegel regarding same (0.40).	425.00	6.40	2,720.00	Billable
7/27/2015 205761	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding updates on case (0.50); review LGCs new production relating to Kwaks employment (1.60); prepare summaries of said LGC production (1.40); e-mails with J. Moy, A. Sheanin and C. Hammarjold regarding said LGC production (0.40); review list of interpreters proposed by Defendants (1.20); assess each interpreter per N. Cihlar (0.80); e-mails with S. Nagano regarding same (0.40); e-mails with R. Spiegel regarding Korean language reviewers availability (0.40); proofread draft translation of LGC documents (1.00); prepare hot document lists for LGC deponents (1.00); circulate same to R. Spiegel and N. Cihlar (0.20).	425.00	8.90	3,782.50	Billable
7/28/2015 205763	Shinae Kim-Helms WORK Review emails between DPPs and IPPs co-counsel assessing importance of LGCs new production relating to [redacted] (0.30); review Y. Rhas batch summary [redacted] (0.20).	425.00	0.50	212.50	Billable
7/28/2015 205881	Richard Noh WORK Update master translation tracking list with recent translations (1.00); save and organize new informal translations (1.00); prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.50).	145.00	4.50	652.50	Billable
7/28/2015 206381	Anna Gooding WORK Pull foreign documents from Catalyst per request of C. Voigt.	145.00	1.00	145.00	Billable
7/29/2015 205882	Richard Noh WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50).	145.00	1.50	217.50	Billable
7/29/2015 206383	Anna Gooding WORK Update master translation tracking list with recent translations per request of N. Cihlar.	145.00	2.30	333.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/30/2015 205883	Richard Noh WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.50); update translation status per the request of N. Cihlar (1.00).	145.00	3.50	507.50	Billable
7/30/2015 206385	Anna Gooding WORK Update master translation tracking list with recent translations per request of N. Cihlar.	145.00	2.00	290.00	Billable
7/31/2015 205764	Shinae Kim-Helms WORK Review weekly background materials and summary of call (0.30); e-mails with R. Spiegel regarding availability and work transition (0.20).	425.00	0.50	212.50	Billable
7/31/2015 206388	Anna Gooding WORK Update master translation tracking list with recent translations per request of N. Cihlar.	145.00	0.50	72.50	Billable
8/3/2015 205765	Shinae Kim-Helms WORK Review emails between IPPs and DPPs co-counsel regarding finalizing certified translations of newly produced LGC documents (0.30); e-mails with J. Choi regarding revisions to draft translations (0.20).	425.00	0.50	212.50	Billable
8/3/2015 205885	Richard Noh WORK Update master translation tracking list with recent translations (2.00); save and organize new informal translations (0.50); tag translations on Catalyst per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.50).	145.00	5.00	725.00	Billable
8/4/2015 206420	Shinae Kim-Helms WORK Review emails summarizing hot documents [redacted] (0.20).	425.00	0.20	85.00	Billable
8/4/2015 206443	Richard Noh WORK Update master translation tracking list with recent translations (2.30); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.20); email correspondence with translation company regarding the same (0.50).	145.00	5.50	797.50	Billable
8/5/2015 206421	Shinae Kim-Helms WORK Review emails summarizing hot documents [redacted] (0.10); e-mails with R. Noh regarding status of certified translations in progress (0.20).	425.00	0.30	127.50	Billable
8/5/2015 206444	Richard Noh WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (1.00); update translation status per the request of S. Kim-Helms (1.00); tag translations on Catalyst per the request of S. Kim-Helms (2.00).	145.00	6.00	870.00	Billable
8/6/2015 206422	Shinae Kim-Helms WORK Review list of documents to be sent out for translation in preparation for Fujimoto and Eguchi depositions (1.30); e-mails with N. Cihlar and A. Gooding regarding same (0.40).	425.00	1.70	722.50	Billable
8/6/2015 206461	Anna Gooding WORK Prepare foreign documents for translation request (3.00); email correspondence with translation company regarding the same per request of N. Cihlar (0.50).	145.00	3.50	507.50	Billable
8/7/2015 206423	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding list of documents to send for certified translation in preparation for Fujimoto and Eguchi depositions (0.70); teleconference with A. Gooding regarding same (0.80); review draft emails prepared by A. Gooding to translation company (1.00); review and	425.00	7.30	3,102.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	analyze documents listed for translation for duplicates (0.70); de-duplicate translation list (0.50); e-mails with DPPs and IPPs Toshiba deposition team regarding de-duplicated list (0.50); send out Fujimoto and Eguchi documents for translation to translation company (0.30); review draft emails prepared by A. Gooding to translation company (0.50); review and analyze documents listed for translation for duplicates (0.50); de-duplicate translation list (0.50); e-mails with DPPs and IPPs Toshiba deposition team regarding de-duplicated list (0.40); send out Kubo documents for translation to translation company (0.20); e-mails with T. Lee regarding translation field tagging in Catalyst (0.40); review e- mails from J. Choi summarizing hot documents for Donny Lee (0.30).				
8/7/2015 206462	Anna Gooding WORK Prepare foreign documents for translation request (2.30); email correspondence with translation company regarding the same per request of N. Cihlar (0.50).	145.00	2.80	406.00	Billable
8/8/2015 206424	Shinae Kim-Helms WORK Review list of documents for translation per N. Cihlar.	425.00	0.50	212.50	Billable
8/8/2015 206496	Nathan Cihlar WORK Emails with D. Lambrinos regarding translation request for document for potential use at Kubo and Fujimoto depositions (0.10); review and analysis of document (0.10).	350.00	0.20	70.00	Billable
8/9/2015 206425	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding list of documents for translation (0.20); prepare list of potential exhibits for SH Kwak deposition per N. Cihlar (0.10).	425.00	0.30	127.50	Billable
8/10/2015 206426	Shinae Kim-Helms WORK Receive and review documents requested for translation by D. Lambrinos (1.20); e-mails with N. Cihlar regarding same (0.40); e-mails with S. Nagano regarding Kubo documents requested for translation (0.40); e-mails with D. Lambrinos and G. Zelden regarding list of documents for translation (0.40); e- mails with R. Noh regarding translation status (0.40).	425.00	2.80	1,190.00	Billable
8/10/2015 206445	Richard Noh WORK Save and organize new certified translations (0.30); tag translations on Catalyst per the request of S. Kim-Helms (0.70).	145.00	1.00	145.00	Billable
8/10/2015 206463	Anna Gooding WORK Update master translation tracking list with recent translations per request of N. Cihlar.	145.00	2.00	290.00	Billable
8/11/2015 206427	Shinae Kim-Helms WORK E-mails with V. Glaze regarding translation fee estimates (0.40); join reviewers weekly call, run by R. Spiegel, to discuss document review in preparation for upcoming deposition (0.70); receive and review draft translations prepared by translation company (2.70); propose division of draft translations to proofread to DPPs (2.20); e-mails with C. Nishimura regarding draft translations to proofread (0.50); e-mails with R. Noh regarding translation-related issues (0.40); e-mails with Y. Rha regarding contracts tag in Catalyst (0.60); e-mails with D. Lambrinos and G. Zeldin regarding halting translation process (0.40).	425.00	7.90	3,357.50	Billable
8/11/2015 206446	Richard Noh WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.50); update translation status per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding cost of translations (0.50).	145.00	4.00	580.00	Billable
8/12/2015 206428	Shinae Kim-Helms WORK E-mails with DPPs regarding documents requested for translation in preparation for Eguchi deposition (0.40); check for duplicate documents with translation available (0.60); receive and review draft translations prepared by translation company (0.50); propose division of draft translations to proofread to DPPs (0.50); e-mails with C. Nishimura regarding draft translations to	425.00	4.40	1,870.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	proofread (0.40); e-mails with R. Spiegel and H. Rim regarding Japanese teams availability to proofread draft translation (0.40); receive and review documents requested for translation for Eguchi deposition (1.20); e-mail with R. Noh regarding same (0.40).				
8/12/2015 206447	Richard Noh WORK Update master translation tracking list with recent translations (5.00); email correspondence with translation company regarding revisions to translations (0.30); email correspondence with translation company regarding cost of translations (0.20).	145.00	5.50	797.50	Billable
8/13/2015 206429	Shinae Kim-Helms WORK E-mails with C. Nishimura regarding availability to proofread draft translations (0.80); e-mails with R. Spiegel regarding LGC deposition preparation call (0.40); receive and review draft translations from translation company (1.20); coordination translations to proofread with DPPs (0.40); e-mails with DPPs regarding same (0.40); teleconference with N. Cihlar regarding formatting foreign originals along with certified translations for excel files (0.50); e-mails with R. Noh regarding same (0.40); e-mails with T. Lee regarding availability of proofreading draft translations (0.40); assign draft translations to proofread to T. Lee (0.30); e-mails with R. Noh regarding formatting excel files to be entered into exhibit (0.40); join weekly managers call, run by R. Spiegel, to discuss deposition preparation- related issues (0.50); review LGC correspondence [redacted] (1.00); e-mails with N. Cihlar regarding same (0.40).	425.00	7.10	3,017.50	Billable
8/13/2015 206448	Richard Noh WORK Prepare foreign documents for translation (1.80); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translation (0.30); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.30); prepare formatting for translation (1.50); email correspondence with S. Kim-Helms regarding the same (0.30).	145.00	6.00	870.00	Billable
8/14/2015 206430	Shinae Kim-Helms WORK Review informal translation of [redacted] prepared by DPPs (1.20); search for [redacted] documents (2.70); [redacted] (1.20).	425.00	5.10	2,167.50	Billable
8/14/2015 206449	Richard Noh WORK Update master translation tracking list with recent translations (2.00); draft email regarding revisions to translations per the request of S. Kim-Helms (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20).	145.00	3.50	507.50	Billable
8/17/2015 206431	Shinae Kim-Helms WORK Teleconference with S. Scarlett, J. Choi, and J. Jeong regarding document review in search for [redacted] (0.40); e-mails with S. Scarlett, J. Choi, and J. Jeong regarding [redacted] information and hot documents [redacted] (0.40); prepare informal translation of said document per S. Scarlett (1.20); review draft translations prepared by translation company (0.90); e-mails with C. Nishimura regarding draft translations to proofread (1.20); e-mails with S. Nagano regarding Sumoto related documents (0.40); e-mails with N. Cihlar to discuss deposition schedule, case updates and other related issues (0.40); e-mails with R. Noh regarding status of certified translations (0.40); e-mails with DPPs regarding status of revisions to draft translations (0.40); teleconference with R. Noh to discuss translation related issues (0.50); search for [redacted] documents (2.00); prepare [redacted] index (0.50).	425.00	8.70	3,697.50	Billable
8/18/2015 206432	Shinae Kim-Helms WORK E-mails with R. Noh and A. Gooding regarding finalizing certified translations in preparation for upcoming Toshiba depositions (0.40); search for [redacted] per S. Nagano (1.00); e-mails with S. Nagano regarding same (0.40); e-mails with R. Noh regarding formatting of certified translations (0.40); receive documents requested for certified translation from J. Moy for Fujimoto deposition (0.50); review said documents for duplicate documents and availability of other translations (1.20); e-mails with J. Moy and G. Zeldin whether to place order on rush basis (0.40); teleconference with N. Cihlar regarding status of certified translation in preparation for Toshiba depositions (0.50); teleconference with N. Cihlar regarding contacting translation company based on fee estimates and estimated time to deliver rough translations (0.50); e-mails with G. Zeldin to discuss rush request of certified translation (0.40); teleconference with G. Zeldin	425.00	8.20	3,485.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	regarding same (0.50); teleconference with R. Noh to discuss finalizing and prioritizing certified translations in order of upcoming depositions (0.50); search for and review [redacted] documents (1.50).				
8/18/2015 206452	Richard Noh WORK Prepare foreign documents for translation (4.10); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding the same (0.20); save and organize recently certified translations (0.30); update translation status per the request of S. Kim-Helms (0.30).	145.00	6.50	942.50	Billable
8/19/2015 206433	Shinae Kim-Helms WORK E-mails with G. Zeldin regarding status of certified translations for Toshiba depositions (0.40); prepare certified translation chart per G. Zeldin (0.80); teleconference with N. Cihlar regarding same (0.50); teleconference with R. Noh regarding prioritizing translations to be certified in preparation for Toshiba depositions and zip of informal translations prepared by translation company (0.60); e-mails with J. Moy regarding wording to be corrected in translations and status of certified translations to be finalized in preparation for Toshiba depositions (0.40); review revisions to rough translations prepared by DPPs (1.20); e-mails with N. Cihlar regarding new Korean lang reviewer (0.70); e-mails with A. Lunzer regarding certified translations served by Defendants (0.50); review revisions to draft translations prepared by DPPs (0.10); e-mail same to translation company (0.40).	425.00	5.60	2,380.00	Billable
8/19/2015 206453	Richard Noh WORK Update master translation tracking list with recent translations (2.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.80); email correspondence with translation company regarding the same (0.50); save and organize recently certified translations (0.50); update translation status per the request of S. Kim-Helms (0.40).	145.00	7.00	1,015.00	Billable
8/20/2015 206434	Shinae Kim-Helms WORK E-mails with R. Noh regarding formatting of certified translations of Excel documents (0.80); e-mails with M. Pilotin regarding steps and time frame to prepare certified translations (0.80); e-mails with J. Choi and J. Jeong regarding search terms in Korean and issues of wildcard searches in Korean in Catalyst (1.00); join weekly managers teleconference, run by S. Scarlett to discuss updates in document production, status of document review in preparation for Toshiba depositions and other related issues (1.20); e-mail to Korean language review team regarding [redacted] (0.40); e-mails with Japanese language reviewers regarding availability to proofread rough translations (1.00); e-mails with G. Zeldin regarding attachments to documents requested for translation (0.80); e-mails with Japanese language review team regarding availability to proofread rough translations (0.80).	425.00	6.80	2,890.00	Billable
8/20/2015 206454	Richard Noh WORK Prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translation (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.80); update translation status per the request of S. Kim-Helms (0.50).	145.00	7.00	1,015.00	Billable
8/21/2015 206435	Shinae Kim-Helms WORK Search for and review documents relating [redacted] (1.20); review and revise [redacted] index (1.20); e-mail same to S. Scarlett (0.40); e-mails with R. Noh regarding status of certified translations to be finalized in preparation for Toshiba depositions (0.40); review draft translations prepared by translation company (1.20); email same to DPPs to proofread (0.40); e-mails with Japanese language reviewers regarding draft translations to proofread (0.40); e- mails with G. Zeldin regarding status of certified translations in preparation for Toshiba depositions (0.40); e-mails with A. Elder regarding search terms to include family members in results (0.40); e- mails with S. Scarlett regarding need to add Japanese and Chinese language reviewers [redacted] (0.40).	425.00	6.40	2,720.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/21/2015 206455	Richard Noh WORK Update master translation tracking list with recent translations (4.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.30); save and organize recently certified translations (0.20); update translation status per the request of S. Kim-Helms (0.50).	145.00	6.50	942.50	Billable
8/24/2015 206436	Shinae Kim-Helms WORK Teleconference with Y. Rha to discuss [redacted] document review (0.50); review Translation Protocol Order (0.80); e-mails with N. Cihlar regarding same (0.40); e-mails with DPPs regarding revisions to rough translations (0.40); e-mails with V. Glaze and N. Cihlar regarding liaison counsel from each party (0.40); e-mails with N. Ahuja regarding updating translation of [redacted] (0.40); e-mails with R. Noh regarding informal translations of same (0.40); run searches [redacted] in Catalyst (0.20); populate batches based on said searches (0.20); e-mails with Y. Rha regarding same (0.40); assign Y. Rha to review said batch regarding [redacted] (0.20); e-mails with R. Noh regarding comparison of [redacted] (0.40); e-mails with G. Zeldin regarding status of translations for Toshiba depositions (0.20); review status of certified translations to be finalized in preparation for Toshiba depositions (0.20); e-mails with R. Noh regarding same (0.20); review documents requested for rushed translation by D. Lambrinos (0.40); search for duplicates with translation available (0.40); e-mails with R. Noh and N. Cihlar regarding same (0.20).	425.00	6.30	2,677.50	Billable
8/24/2015 206457	Richard Noh WORK Update master translation tracking list with recent translations (4.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20); save and organize recently certified translations (0.20); update translation status per the request of S. Kim-Helms (0.50); analyze updated informal document for changes in text per the request of S. Kim-Helms (1.00).	145.00	7.20	1,044.00	Billable
8/24/2015 206480	Anna Gooding WORK Pull translation protocol per request of N. Cihlar (0.20).	145.00	0.20	29.00	Billable
8/25/2015 206458	Richard Noh WORK Prepare foreign documents for translation (3.50); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.40); save and organize recently certified translations (0.20); update translation status per the request of S. Kim-Helms (0.30); tag translations on Catalyst per the request of S. Kim-Helms (1.00).	145.00	7.50	1,087.50	Billable
8/25/2015 206481	Shinae Kim-Helms WORK Review documents requested for translation by D. Lambrinos (1.20); search for duplicate and near duplicate documents with translation available (1.00); e-mails with N. Cihlar and R. Noh regarding same (0.40); discuss whether to send translation requests on rush basis with D. Lambrinos (0.40); review list of documents requested for translation by D. Lambrinos (1.20); follow-up teleconference with N. Cihlar and R. Noh (0.50); e-mail with R. Noh regarding status of certified translations prepared for Toshiba depositions (0.40); e-mail with D. Lambrinos and N. Cihlar to cull down translation list for Kubo deposition (0.40); review documents on translation list and select documents (1.20); search for packers related documents tagged as hot on Catalyst (0.40); prepare index of said documents (0.90).	425.00	8.00	3,400.00	Billable
8/26/2015 206482	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding documents requested for rush translation in preparation for Kubo (0.50); e-mails with S. Nagano regarding culled down list of documents for translation in preparation for Kubo deposition (0.40); teleconference with translation company regarding rush requests of translations for Kubo deposition (0.60); teleconference with A. Gooding regarding translation related matter (0.50); review e-mails from D. Lambrinos requesting certified translations previously finalized (2.60); send translation requests to translation company (0.20); e-mails with	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Japanese language reviewer regarding availability to proofread draft translations (0.40); e-mails with H. Rim regarding correction to be made to potential [redacted] exhibit (0.40); e-mail to A. Gooding regarding same (0.40); review and circulate updated informal translation of [redacted] to DPPs and IPPs translation management team (1.20).				
8/26/2015 206491	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (3.20); email correspondence with translation company regarding the same (0.20).	145.00	4.00	580.00	Billable
8/27/2015 206483	Shinae Kim-Helms WORK Review rough translations from translation company (3.10); assign same to DPPs and IPPs to proofread (0.20); e-mails with DPPs translation management team regarding proofreading draft translations and time frame (0.40); e-mails with A. Gooding to finalize certified translations (0.40); teleconference with A. Gooding regarding same (0.60); e-mails with A. Gooding regarding updating translation tracking chart (0.40); e-mails with T. Lee and S. Nagano regarding draft translations to proofread (0.40); e-mail with Y. Rha regarding Korean code language (0.40); e-mail with A. Gooding regarding request by M. Pilotin for copy of certified translation (0.40); e-mails with foreign language review team regarding compiling packers related documents (0.80); e-mails with D. Lambrinos regarding documents requested for rushed translation (0.40).	425.00	7.50	3,187.50	Billable
8/27/2015 206492	Anna Gooding WORK Update master translation tracking list with recent translations (1.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (4.20); email correspondence with translation company regarding the same (0.50).	145.00	6.30	913.50	Billable
8/28/2015 206484	Shinae Kim-Helms WORK Teleconferences with A. Gooding to discuss translation related matter and coding translation field in Catalyst (0.50); review rough translations from translation company (2.70); assign same to DPPs and IPPs to proofread (0.30); e-mails with DPPs translation management team regarding proofreading draft translations and time frame (0.40); e-mail with T. Lee regarding compiling key English translations to be circulated to translation company (0.80); e-mails with J. Moy and J. Manning regarding documents for urgent translation in preparation for Eguchi deposition (0.70); teleconference with J. Moy regarding same (0.40); e- mails with A. Gooding regarding formatting excel to be used as exhibit at depositions (0.50); teleconference with A. Gooding regarding same (1.20); review draft email to be circulated to deposition team and translation management team prepared by A. Gooding (0.40); e-mails with A. Gooding regarding same (0.80).	425.00	8.70	3,697.50	Billable
8/28/2015 206493	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (6.10); email correspondence with translation company regarding the same (0.40).	145.00	7.30	1,058.50	Billable
8/30/2015 206485	Shinae Kim-Helms WORK Review informal translation prepared by DPPs in preparation for Eguchi deposition (0.20); send out rush translation request to translation company (0.10); review revisions to draft translations prepared by DPPs (0.10); forward same to translation company (0.10).	425.00	0.50	212.50	Billable
8/31/2015 206486	Shinae Kim-Helms WORK E-mails with T. Lee regarding task descriptions (0.40); review draft revisions prepared by translation company (0.50); e-mails with DPPs regarding same (0.40); circulate draft translations to DPPs translation team (1.20); e-mails draft translations to S. Nagano and T. Lee to proofread (1.20); e-mails with S. Nagano regarding same (0.40); e-mails with translation company regarding rush translation request (0.40); teleconference regarding same (0.50); e-mails with A. Gooding regarding hidden rows in certified translation (0.40); follow-up teleconference with A. Gooding regarding same (0.50); e-mails with D. Lambrinos regarding status of certified translations to be entered at Kubo deposition (0.30); e-mails with A. Gooding regarding formatting certified translations (0.30); reformat	425.00	7.80	3,315.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	draft translation in Excel to be certified (0.20); e-mails with J. Moy regarding rush translation request to be entered at Eguchi deposition (0.30); e-mails with S. Scarlett regarding Kubo deposition schedule (0.30); review Court Order regarding Kubo deposition schedule (0.20); e-mail to translation company to change rush request to non-rush (0.30).				
8/31/2015 206494	Anna Gooding WORK Update master translation tracking list with recent translations (1.40); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (7.10); email correspondence with translation company regarding the same (0.30); tag translations on Catalyst per the request of S. Kim-Helms (0.40).	145.00	9.50	1,377.50	Billable
9/1/2015 206512	Shinae Kim-Helms WORK E-mails with J. Moy regarding draft translations to proofread (0.40); e-mails with J. Moy regarding urgent translation request for Eguchi deposition (0.40); e-mails with S. Nagano and T. Lee regarding revising draft translations (0.40); e-mails with D. Lambrionos regarding status of certified translations in preparation for Kubo deposition (0.40); [redacted] (1.20); [redacted] (1.60); review draft email prepared by A. Gooding (1.20); e-mails with A. Gooding regarding certified translations to be finalized (0.40); search for and review [redacted] documents in Catalyst (1.80); code relevant documents and prepare [redacted] index (1.50).	425.00	9.30	3,952.50	Billable
9/1/2015 206538	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (5.40); email correspondence with translation company regarding the same (0.50).	145.00	7.00	1,015.00	Billable
9/2/2015 206513	Shinae Kim-Helms WORK E-mails with A. Gooding regarding certified translation related matters (0.40); teleconference with A. Gooding regarding same (0.50); search for and review [redacted] documents in Catalyst (1.20); code relevant documents (2.20); prepare [redacted] index (1.20); e-mails with D. Lambrinos regarding documents to be requested for translation (0.40); review hot documents submitted by J. Choi (1.40); receive and review translation request [redacted] (0.50).	425.00	7.80	3,315.00	Billable
9/2/2015 206539	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (5.10); email correspondence with translation company regarding the same (0.30).	145.00	6.00	870.00	Billable
9/2/2015 206564	Richard Noh WORK Update master translation tracking list with recent translations (1.70); format foreign originals to match translations per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.30).	145.00	2.50	362.50	Billable
9/3/2015 206514	Shinae Kim-Helms WORK E-mails with S. Scarlett regarding translation requests [redacted] (0.40); e-mails with J. Choi regarding translation assignment (0.40); e-mails with A. Gooding regarding formatting of certified translations in excel (0.40); review Translation Protocol (0.80); e-mails with A. Gooding regarding same (0.40); e-mails with J. Choi regarding coding issues (0.40); search for and review [redacted] (2.20); code relevant documents (2.50); prepare [redacted] index (1.00).	425.00	8.50	3,612.50	Billable
9/3/2015 206540	Anna Gooding WORK Update master translation tracking list with recent translations (1.60); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (3.20); email correspondence with translation company regarding the same (0.50).	145.00	5.80	841.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/4/2015 206515	Shinae Kim-Helms WORK Receive request of copies of certified translation from D. Lambrinos (0.30); teleconference with A. Gooding regarding same (0.50); check status of certified translations per D. Lambrinos (0.70); receive and review draft translations from translation company (0.50); e-mails with DPPs to split draft translations to proofread (0.50); e-mails with A. Gooding regarding documents to be tagged in the translation field in Catalyst (0.40); review [redacted] hot document chart prepared by Y. Rha (1.50); e-mails with S. Scarlett regarding same (0.40); search for and review [redacted] documents in Catalyst (1.20); update and revise packers chron index (2.20); circulate [redacted] to S. Scarlett and Korean language review team (1.20).	425.00	9.40	3,995.00	Billable
9/4/2015 206541	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (5.20); email correspondence with translation company regarding the same (0.60).	145.00	6.80	986.00	Billable
9/8/2015 206516	Shinae Kim-Helms WORK Review Y. Rhas [redacted] memo per S. Scarlett (2.70); review hot documents discovered by Y. Rha (1.60); e-mails with S. Scarlett regarding same (0.40); [redacted] (1.00); teleconference with M. Pilotin regarding searching for documents [redacted] (0.70); search database for [redacted] documents [redacted] (1.30); e-mails with M. Pilotin regarding same (0.60); e-mails with A. Gooding regarding formatting of certified translations and near duplicate documents requested for translation (0.40).	425.00	8.70	3,697.50	Billable
9/8/2015 206542	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (4.00); email correspondence with translation company regarding the same (0.30).	145.00	5.00	725.00	Billable
9/9/2015 206517	Shinae Kim-Helms WORK E-mails with A. Gooding regarding status of certified translations and availability of other paralegals (0.40); continue to search database for [redacted] (8.00); e-mails with M. Pilotin regarding same (0.40).	425.00	8.80	3,740.00	Billable
9/9/2015 206543	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.10).	145.00	2.00	290.00	Billable
9/10/2015 206518	Shinae Kim-Helms WORK Continue to search database for [redacted] (2.80); update [redacted] (2.10); finalize said list and forward to M. Pilotin (0.60); e-mails with M. Pilotin regarding same (0.40); teleconference with M. Day regarding translation related matter (0.50); e-mails with M. Pilotin regarding urgent translation request of document entered at Eguchi deposition (0.40); e-mail with J. Moy regarding same (0.20); e-mail to translation company requesting certified translation (0.40); receive and review revised translation of document entered at Eguchi deposition (0.20); e-mails with J. Manning regarding same (0.40).	425.00	8.00	3,400.00	Billable
9/11/2015 206519	Shinae Kim-Helms WORK E-mails with S. Scarlett regarding [redacted] document review (0.40); circulate [redacted] to S. Scarlett and M. Pilotin (0.30); e-mails with A. Gooding regarding status of certified translations in preparation for upcoming depositions (0.40); review draft translations prepared by Consortra (0.40); e-mail to DPPs translation management team assigning draft translations to proofread (0.40); e-mails with S. Nagano regarding review of Korean documents [redacted] (0.40); search for documen [redacted] (2.20); review said documents	425.00	7.50	3,187.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(1.20); prepare [redacted] (1.80).				
9/14/2015 206520	Shinae Kim-Helms WORK Receive and analyze documents D. Lambrinos requested for translation for Fukai deposition (0.60); e- mails with D. Lambrinos regarding same (0.40); e-mail to A. Gooding instructing to send out new translation request (0.40); continue to search for document [redacted] (3.10); review said documents (1.20); [redacted] (1.20); circulate [redacted] to S. Scarlett and M. Pilotin (0.40); e-mails with A. Gooding regarding certified translation status (0.40); teleconference with A. Gooding regarding same (0.50).	425.00	8.20	3,485.00	Billable
9/14/2015 206544	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (5.00); email correspondence with translation company regarding the same (0.10).	145.00	5.80	841.00	Billable
9/14/2015 206565	Richard Noh WORK Update master translation tracking list with recent translations (1.30); format foreign originals to match translations per the request of S. Kim-Helms (0.20); format excel translations per the request of S. Kim-Helms (0.70).	145.00	2.20	319.00	Billable
9/15/2015 206522	Shinae Kim-Helms WORK Review order compelling Kwaks deposition (0.30); e-mails with M. Pilotin regarding translation tracking chart in shared site (0.40); e-mails with S. Nagano regarding Korean documents reviewed per experts request (0.20); review Toshiba deposition notices (0.40); e-mails with A. Gooding regarding status of certified translations (0.40); review draft translations (1.20); assign draft translations to proofread to DPPs and IPPs (0.40); search for [redacted] per S. Scarletts request (0.40); prepare chart and circulate same (0.50); review and analyze documents requested for certified translation by D. Lambrinos (0.90); e-mails with R. Noh and A. Gooding regarding same (0.40); teleconference with V. Glaze regarding use of shared site for certified translations (0.50); review Korean document identified by S. Nagano to be reviewed (0.60); continue to search [redacted] related documents in database (1.00); update [redacted] and circulate to S. Scarlett and M. Pilotin (0.40).	425.00	8.00	3,400.00	Billable
9/15/2015 206545	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (3.80); email correspondence with translation company regarding the same (0.20).	145.00	4.50	652.50	Billable
9/15/2015 206566	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (1.50); format excel translations per the request of S. Kim-Helms (1.40); update case files with recent certified translations (0.30).	145.00	3.20	464.00	Billable
9/16/2015 206523	Shinae Kim-Helms WORK Receive and review draft translations from translation company (2.20); split draft translations with DPPs (0.20); e-mails with Japanese language reviewers to assign draft translations to proofread (0.80); teleconference with A. Gooding and R. Noh regarding shared site for finalized certified translations (0.60); e-mails with M. Pilotin regarding logistics of using shared site for finalized certified translations and uploading translation tracking chart (0.70); teleconference with M. Pilotin regarding same (0.50); review business plan documents requested for certified translation by D. Lambrinos (2.40); e-mails with D. Lambrinos regarding same (0.40); e-mails with A. Gooding regarding status of translations of [redacted] (0.40); e-mails with S. Scarlett and S. Nagano regarding Korean documents that need to be reviewed [redacted] (0.40).	425.00	8.60	3,655.00	Billable
9/16/2015 206546	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for	145.00	3.80	551.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	formatting accuracy (2.20); email correspondence with translation company regarding the same (0.50).				
9/16/2015 206567	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (2.00); format excel translations per the request of S. Kim-Helms (1.00); update case files with recent certified translations (0.50); upload certified translations and foreign originals for other counsel per the request of S. Kim-Helms (1.00).	145.00	4.50	652.50	Billable
9/17/2015 206524	Shinae Kim-Helms WORK Review and analyze documents D. Lambrinos requested for certified translation in preparation for [redacted] (0.60); search for duplicate and near duplicate documents with available translations (0.40); teleconference with R. Noh regarding checking attachments and cover emails to documents requested for certified translation in preparation for Fukai deposition (0.50); review translation protocol (0.70); teleconference with D. Lambrinos regarding documents necessary for certified translation (0.70); receive and review document DPPs requested for certified translation in preparation [redacted] (1.20); e-mails with A. Gooding regarding same (0.40); e-mails with G. Zeldin regarding [redacted] translation request (0.40); e-mails with J. Choi regarding proofreading draft translation (0.40); e-mails with M. Pilotin regarding [redacted] (0.40); e-mails with A. Elder regarding searching for [redacted] (0.40); e-mails with M. Pilotin regarding coding said documents (0.40); check status of finalized certified translations (0.60); e-mails with R. Noh and A. Gooding regarding uploading finalized certified translations (0.40); e-mails with A. Gooding regarding status of Kubo certified translations (0.40).	425.00	7.90	3,357.50	Billable
9/17/2015 206547	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (3.50); email correspondence with translation company regarding the same (0.20).	145.00	4.50	652.50	Billable
9/17/2015 206568	Richard Noh WORK Upload certified translations and foreign originals for other counsel per the request of S. Kim-Helms (1.50); update translation status per the request of S.Kim-Helms (0.80); format foreign originals to match translations per the request of S. Kim-Helms (1.20).	145.00	3.50	507.50	Billable
9/18/2015 206525	Shinae Kim-Helms WORK Search for [redacted] (3.80); update chart per M. Pilotin (1.80); review draft translations prepared by translation company (1.40); coordinate review of draft translations among DPPs and IPPs Japanese language review team (0.40); e-mails with C. Nishimura and S. Nagano regarding same (0.40).	425.00	7.80	3,315.00	Billable
9/18/2015 206548	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.20).	145.00	2.00	290.00	Billable
9/18/2015 206569	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.40); prepare foreign documents for translation (3.30); email correspondence with translation company regarding the same (0.30).	145.00	4.00	580.00	Billable
9/21/2015 206526	Shinae Kim-Helms WORK Continue to search for [redacted] (2.30); update chart per M. Pilotin (0.70); review draft translations prepared by translation company (1.20); assign draft translations to be proofread to DPPs and IPPs Japanese language review team (1.20); e-mails with C. Nishimura and S. Nagano	425.00	6.70	2,847.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	regarding same (0.40); e-mails with J. Moy regarding informal translations needed for Panasonic documents (0.40); teleconference with R. Noh regarding status of certified translations (0.50).				
9/21/2015 206549	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.20).	145.00	2.00	290.00	Billable
9/21/2015 206570	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); format foreign originals to match translations per the request of S. Kim-Helms (3.20).	145.00	3.50	507.50	Billable
9/22/2015 206527	Shinae Kim-Helms WORK E-mails with M. Pilotin regarding newly produced Toshiba documents (0.40); search database for said Toshiba documents (1.30); e-mails with M. Pilotin regarding request for certified translation of Toshiba document [redacted] (0.40); e-mails with A. Gooding and R. Noh regarding status of certified translations [redacted] (0.40); e-mails with S. Nagano regarding group call (0.40); e-mails with J. Choi and A. Elder regarding proofreading draft translation (0.40); continue to search [redacted] (1.80); prepare and finalize chart listing bates numbers of said documents (0.80); code said documents in database (1.00).	425.00	6.90	2,932.50	Billable
9/22/2015 206550	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same per request of N. Cihlar (0.20).	145.00	2.00	290.00	Billable
9/22/2015 206571	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (2.50); format excel translations per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding revisions to translations (0.20); prepare translations for re-certification (0.30).	145.00	4.00	580.00	Billable
9/23/2015 206528	Shinae Kim-Helms WORK E-mails with M. Pilotin and S. Nagano regarding Toshibas new production (0.40); receive and analyze documents requested for translation by DPPs [redacted] (1.20); search for duplicate and near duplicate documents with translation available (2.20); e-mails with DPPs regarding same (0.40); instruct A. Gooding and R. Noh to send out request for said translations (0.50); search for [redacted] in database (0.50); review and code said documents (0.50); e-mails with S. Scarlett regarding hot documents in general (0.40); prepare chart for hot documents per S. Scarlett (0.50).	425.00	6.60	2,805.00	Billable
9/23/2015 206551	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.80); email correspondence with translation company regarding the same per request of N. Cihlar (0.30).	145.00	3.00	435.00	Billable
9/23/2015 206572	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.30); prepare translations for re-certification (1.20).	145.00	3.50	507.50	Billable
9/24/2015 206529	Shinae Kim-Helms WORK E-mails with M. Pilotin and S. Nagano regarding Toshibas new production (0.40); search [redacted] (0.80); e-mails with A. Gooding and R. Noh regarding status of certified translations to be finalized in	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	preparation for depositions (0.40); review and analyze documents requested for certified translation by DPPs in preparation for Matsumoto deposition (0.60); search for duplicate and near duplicate documents with translation available (1.20); e-mail correspond with J. Moy regarding same (0.40); e-mails with A. Gooding regarding translation status of said documents requested for translation (0.40); e-mails with N. Cihlar regarding Japanese interpreters provided by Defendants in depositions (0.40); review and analyze documents requested for certified translation by DPPs in preparation for Donny Lee deposition (1.20); search for duplicate and near duplicate documents with translation available (1.00); e-mail correspond with J. Moy regarding same (0.40).				
9/24/2015 206552	Anna Gooding WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same per request of N. Cihlar (0.50).	145.00	6.00	870.00	Billable
9/24/2015 206573	Richard Noh WORK Prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.00); format foreign originals to match translations per the request of S. Kim-Helms (0.80); update master translation tracking list with recent translations (0.10).	145.00	4.30	623.50	Billable
9/25/2015 206530	Shinae Kim-Helms WORK E-mail with A. Gooding regarding translation status of documents requested for translation by DPPs in preparation for Donny Lee deposition (0.40); e-mails with A. Gooding regarding formatting error in certified translations (0.40); follow-up teleconference with A. Gooding regarding same (0.50); review draft translations prepared by translation company and assign same to DPPs and IPPs (1.70); e-mails with Japanese language reviewer regarding proofreading draft translations (0.80).	425.00	3.80	1,615.00	Billable
9/25/2015 206553	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same per request of N. Cihlar (0.50).	145.00	5.00	725.00	Billable
9/25/2015 206574	Richard Noh WORK Format excel translations per the request of S. Kim-Helms (1.50); email correspondence with translation company regarding revisions to translations (0.30); prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20).	145.00	3.00	435.00	Billable
9/28/2015 206531	Shinae Kim-Helms WORK Receive and review documents requested for rush translation by D. Lambrinos in preparation for Fukai deposition (1.20); search for duplicate and near duplicate documents with translation (1.10); e-mail with D. Lambrinos regarding same (0.40); email to translation company to request certified translations of said documents (0.40); e-mails with J. Moy regarding draft translations to proofread (0.80); [redacted] (0.50) [redacted] (0.70); review e-mails from J. Moy with documents requested for translation (0.40); e-mails with R. Noh and A. Gooding regarding translation requests to be sent out (0.40).	425.00	5.90	2,507.50	Billable
9/28/2015 206575	Richard Noh WORK Prepare foreign documents for translation (3.50); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); format foreign originals to match translations per the request of S. Kim-Helms (1.40).	145.00	6.50	942.50	Billable
9/29/2015 206532	Shinae Kim-Helms WORK E-mails with R. Noh regarding certified translation shared site (0.40); e- mails with G. Zeldin regarding access to said shared site (0.40); e-mails with M. Caylao regarding status of certified translation for Kondo (0.40); e-mails with D. Lambrinos regarding documents requested for	425.00	7.60	3,230.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translation in preparation for Kondo and Kubo depositions (0.40); review and analyze said documents requested for translation (0.50); search for duplicate and near duplicate documents with translation available (1.50); e-mails with A. Gooding regarding translation status of said documents requested for translation (0.40); e-mails with J. Moy regarding estimated time for finalization of Matsumoto certified translations (0.40); e-mails with J. Moy regarding documents requested for translation in preparation for Kondo deposition (0.40); review and analyze said documents requested for translation (0.80); search for duplicate and near duplicate documents with translation available (1.10); e-mails with A. Gooding and R. Noh regarding translation status of said documents requested for translation (0.40); teleconference with A. Gooding regarding same (0.50).				
9/29/2015 206554	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.50).	145.00	3.50	507.50	Billable
9/29/2015 206581	Richard Noh WORK Prepare foreign documents for translation (2.50); email correspondence with translation company regarding the same (0.20); format excel translations per the request of S. Kim-Helms (1.00); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding revisions to translations (0.30).	145.00	4.50	652.50	Billable
9/30/2015 206533	Shinae Kim-Helms WORK E-mails with R. Noh regarding availability of native file of document requested for translation (0.40); search for duplicate or near duplicate document with native file available (2.00); e-mails with R. Noh regarding estimated cost of preparing certified translation (0.40); e-mail communications with D. Lambrinos regarding cost of preparing certified translation of document as requested (0.40); review draft translations prepared by translation company (1.20); e-mails with revisors regarding proofreading same (0.40); e-mails with J. Moy regarding urgent translation request in preparation for Matsumoto deposition (0.40); review and analyze documents requested for translation (1.00); search for duplicate and near duplicate documents with translation available (1.20); e-mail to A. Gooding to send out translation request to translation company (0.40).	425.00	7.80	3,315.00	Billable
9/30/2015 206583	Richard Noh WORK Prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (0.50); format excel translations per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.30).	145.00	6.00	870.00	Billable
10/1/2015 206534	Shinae Kim-Helms WORK E-mails with S. Scarlett and H. Rim regarding documents to be reviewed in preparation for DW Lee deposition (0.40); populate batches for review (0.40); assign documents for review to J. Choi (0.10); teleconference with J. Choi to discuss said document review project (0.40); review draft translations prepared by translation company (2.00); assign same to DPPs and IPPs (0.10); e-mails with Japanese language review team (0.40); review [redacted] (1.20); code same in database (1.60).	425.00	6.60	2,805.00	Billable
10/1/2015 206753	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.50).	145.00	3.00	435.00	Billable
10/1/2015 207247	Richard Noh WORK Prepare foreign documents for translation (4.50); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.70); update master translation tracking list with recent translations (0.40).	145.00	6.00	870.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/2/2015 206535	Shinae Kim-Helms WORK E-mail to DPPs regarding near duplicate documents requested for translation (0.40); review email from B. Troxel regarding newly uploaded LGC production (0.40); search said documents in database(1.00); e-mails with B. Troxel regarding same (0.40); e-mails with J. Choi and S. Scarlett regarding coding of documents in preparation for DW Lee deposition (0.40); review draft translations prepared by translation company (0.40); coordinate among DPPs and IPPs on accuracy review (0.80); e-mails with Japanese language review team (1.20); review and analyze documents requested by DPPs for translation in preparation for Kubo and DW Lee depositions (0.20); search for duplicate and near duplicate documents with translation available (1.00); e-mails with J. Moy regarding said DPPs translation request (0.40); e-mail to R. Noh to request certified translation of said documents (0.40); [redacted] (0.20); code same in database (1.00).	425.00	8.20	3,485.00	Billable
10/2/2015 206754	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.50).	145.00	2.00	290.00	Billable
10/2/2015 207248	Richard Noh WORK Prepare foreign documents for translation (2.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.60); email correspondence with translation company regarding the same (0.40).	145.00	5.00	725.00	Billable
10/4/2015 206536	Shinae Kim-Helms WORK E-mails with J. Moy regarding translation request for DW Lee deposition (0.20); review and forward revisions prepared by DPPs to translation company (0.20); e-mail to A. Gooding and R. Noh regarding [redacted] translations to be finalized (0.20).	425.00	0.60	255.00	Billable
10/5/2015 206537	Shinae Kim-Helms WORK E-mails with S. Scarlett regarding indexing issues with Korean language documents (0.40); review search strings prepared by DPPs (0.50); e-mails with C. Smith and B. Clark regarding same (0.40); run searches based on search strings provided by DPPs (1.20); modify said searches to correct errors (0.40); prepare chart with results (1.20); circulate said chart to C. Smith, B. Clark and S. Scarlett (0.50); review draft translations prepared by translation company (1.20); coordinate among DPPs and IPPs for accuracy review (0.20); e-mails with Japanese language review team (0.40); e-mails with G. Zeldin regarding certified translations requested for Fukai deposition (0.40); e-mails with D. Lambrinos regarding status of certified translations prepared for Fukai deposition (0.40); e-mails with A. Lunzer regarding status of certified translation requested and request for translations for Matsumoto deposition (0.40); review and analyze documents requested for translation by DPPs in preparation for Matsumoto and DW Lee depositions (1.00); search for duplicate and near duplicate documents with translation available (0.50); e-mails with L. Amanda and V. Glaze regarding said DPPs translation requests (0.20); e-mails with A. Gooding regarding status of Matsumoto certified translations and availability of translations for said documents requested for DW Lee deposition (0.30); search for [redacted] per S. Scarlett (0.20); e-mail to S. Scarlett with result (0.20).	425.00	10.00	4,250.00	Billable
10/5/2015 206755	Anna Gooding WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy (2.40); email correspondence with translation company regarding the same (0.60).	145.00	4.50	652.50	Billable
10/5/2015 207249	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); format foreign originals to match translations per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (0.30).	145.00	2.00	290.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/6/2015 206949	Shinae Kim-Helms WORK E-mails with G. Zeldin regarding certified translations requested and finalized in preparation for Fukai deposition (1.00); e-mails with J. Choi to assess draft translations (0.50); review and revise draft translations for DW Lee deposition (0.50); teleconferences with A. Gooding regarding urgent translation request for Matsumoto deposition (0.40); e-mails with A. Gooding regarding status of Matsumoto certified translations (0.40); teleconference with A. Gooding regarding certified translation for Fukai deposition (0.20); receive and review urgent translation request for Fukai deposition by D. Lambrinos (0.30); e-mails with C. Nishimura and S. Scarlett regarding availability of Japanese translator to prepare said informal translation (0.50).	425.00	3.80	1,615.00	Billable
10/6/2015 207055	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.50); update Catalyst with recent certified translations per request of S. Kim-Helms (0.50).	145.00	4.00	580.00	Billable
10/6/2015 207250	Richard Noh WORK Prepare foreign documents for translation (3.10); email correspondence with translation company regarding the same (0.30); update translation status per the request of S. Kim-Helms (0.40); email correspondence with translation company regarding revisions to translations (0.20).	145.00	4.00	580.00	Billable
10/7/2015 206950	Shinae Kim-Helms WORK Review and revise draft translations in preparation for DW Lee deposition (0.40); e-mails with A. Elder regarding urgent informal translation requested by D. Lambrinos (0.40); review e-mails by J. Choi regarding errors found in draft translations (0.80); check status of Matsumoto translations (0.50); e- mails with A. Gooding regarding same (0.40); e-mails with M. Pilotin regarding available Japanese language reviewer to proofread draft translations prepared by translation company (0.40); review draft translations prepared by translation company (1.00); assign same to DPPs and IPPs (0.40); e-mails with Japanese and Korean language reviewers regarding proofreading said draft translations (0.40); review and revise informal translations prepared by A. Elder (0.50); prepare informal translation of Korean document as requested by D. Lambrinos (1.20); receive and analyze documents requested for translation in preparation for Kondo deposition by V. Glaze (1.00); search for duplicate documents and near duplicate documents with translation (1.50); e-mails with V. Glaze regarding duplicate documents and hidden tabs to be translated (0.40); e-mails with R. Noh regarding status of certified translations (0.40); e-mails with J. Moy regarding redlined revisions to be prepared by revisors (0.40).	425.00	10.10	4,292.50	Billable
10/7/2015 207057	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.50); update Catalyst with recent certified translations per request of S. Kim-Helms (1.00).	145.00	5.00	725.00	Billable
10/7/2015 207251	Richard Noh WORK Prepare foreign documents for translation (1.60); format foreign originals to match translations per the request of S. Kim-Helms (0.40); format excel translations per the request of S. Kim-Helms (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding the same (0.10).	145.00	3.00	435.00	Billable
10/8/2015 206951	Shinae Kim-Helms WORK E-mails with C. Nishimura and S. Nagano regarding availability to proofread draft translations (0.50); e-mails with A. Gooding regarding status of certified translations finalized for Matsumoto depositions (0.40); check said status (0.30); receive review rush request of certified translation for Matsumoto deposition from J. Moy (1.20); search for duplicate and near duplicate documents of same with translation (2.20); e-mails with J. Moy regarding more inclusive version with translation (0.40); analyze document requested for translation for Fukai deposition (1.20); e-mails with A. Gooding regarding finalized certified translation uploaded to shared site (0.40); e-mail to deposition teams regarding status of certified translations (0.40); review and code documents in preparation for DW	425.00	7.80	3,315.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Lee (0.80).				
10/8/2015 207059	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.50); update Catalyst with recent certified translations per request of S. Kim-Helms (1.00).	145.00	5.00	725.00	Billable
10/8/2015 207252	Richard Noh WORK Prepare foreign documents for translation (1.10); email correspondence with translation company regarding the same (0.20); update translation status per the request of S-Kim-Helms (0.30); format foreign originals to match translations per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.40); update master translation tracking list with recent translations (0.30).	145.00	3.00	435.00	Billable
10/9/2015 206952	Shinae Kim-Helms WORK Review draft translations prepared by translation company (0.40); coordinate among DPPs and IPPs to review for accuracy (0.20); e-mails with Japanese and Korean language reviewers regarding proofreading said draft translations (0.20); review and code documents in preparation for DW Lee deposition (0.90); prepare quick report on said documents (1.20); e-mails with S. Scarlett regarding progress [redacted] (0.40); prepare summary of [redacted] documents and circulate same (1.30); e-mails with J. Moy regarding urgent translation request for Matsumoto deposition (0.40); e-mail to R. Noh regarding same (0.40); e-mails with J. Choi regarding status of proofreading draft translations (0.20); proofread draft translation requested for Matsumoto deposition (0.40); teleconference with R. Noh regarding status of Matsumoto translations (0.50); emails to Matsumoto and Kubo deposition teams regarding status of certified translations requested for each deposition (0.40).	425.00	6.90	2,932.50	Billable
10/9/2015 207061	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); update Catalyst with recent certified translations per request of S. Kim-Helms (0.10).	145.00	1.50	217.50	Billable
10/9/2015 207253	Richard Noh WORK Prepare foreign documents for translation (4.50); email correspondence with translation company regarding the same (0.20); update translation status per the request of S-Kim-Helms (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.50); update master translation tracking list with recent translations (0.50).	145.00	7.00	1,015.00	Billable
10/11/2015 206953	Shinae Kim-Helms WORK Review request by D. Lambrinos for translation of document (0.10); review said document (0.10); search for duplicates and near duplicates with translation available (0.20); send request for certified translation to translation company (0.20); e-mails with J. Moy regarding draft translations to proofread (0.20).	425.00	0.80	340.00	Billable
10/12/2015 206954	Shinae Kim-Helms WORK E-mails with H. Rim regarding most up-to-date translation tracking chart and translation status of document requested for translation (0.20); forward revisions to draft translations prepared by DPPs and IPPs translation team to translation company (0.40); review documents requested for translation by H. Rim in preparation for Takeshima deposition and by DPPs in preparation for Donny Lee deposition (1.00); review said documents (0.70); search for duplicate and near duplicate documents with translation (1.00); email to R. Noh and A. Gooding with instructions to send translation request (0.20).	425.00	3.50	1,487.50	Billable
10/13/2015 206955	Shinae Kim-Helms WORK E-mails with R. Noh regarding status of certified translations requested for Matsumoto and Kubo depositions (0.40); e-mails with S. Scarlett regarding [redacted] (0.40); e-mails with	425.00	4.80	2,040.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	R. Noh regarding same (0.40); check status of documents requested for Matsumoto deposition and Donny Lee depositions (0.40); e-mails with S. Nozaki regarding draft translations to proofread (0.40); e-mails with D. Lambrinos regarding status of informal translation requested (0.40); review documents requested for translation for Kondo and Takeshima depositions by D. Lambrinos and H. Rim (1.20); search for duplicate and near duplicates with translations (0.40); e-mails with H. Rim and D. Lambrinos regarding same (0.40); e-mails with S. Scarlett regarding status of draft translations to be proofread by Korean language review team (0.40).				
10/13/2015 Richard Noh 207254 WORK	Prepare foreign documents for translation (4.50); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.40); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.40).	145.00	7.00	1,015.00	Billable
10/14/2015 Shinae Kim-Helms 206956 WORK	E-mails with R. Noh regarding native version of documents requested for translation and status of certified translations finalized for Kubo deposition (0.40); e-mail to Kubo deposition team regarding same (0.40); receive and review documents requested for translation in preparation for Kondo, Takeshima and Donny Lee depositions (0.40); search for duplicate and near duplicate documents with translation (0.50); e-mails with D. Lambrinos, H. Rim and DPPs regarding same (0.40); e-mails with S. Scarlett regarding availability of Korean language review team (0.40); proofread draft translations to be used for Donny Lee deposition (1.20).	425.00	3.70	1,572.50	Billable
10/14/2015 Richard Noh 207255 WORK	Prepare foreign documents for translation (3.80); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (0.50); format excel translations per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.50).	145.00	6.70	971.50	Billable
10/15/2015 Shinae Kim-Helms 206957 WORK	E-mails with R. Noh regarding issues with document production (0.50); review and assign draft translations to DPPs and IPPs teams (1.00); e-mails with Japanese language review team regarding same (0.50); e-mails with S. Nagano regarding draft translations to proofread (0.50).	425.00	2.50	1,062.50	Billable
10/15/2015 Richard Noh 207256 WORK	Update translation status per the request of S-Kim-Helms (0.50); format foreign originals to match translations per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); update master translation tracking list with recent translations (0.80).	145.00	4.00	580.00	Billable
10/16/2015 Shinae Kim-Helms 206958 WORK	Review documents requested for translation by DPPs for Kondo deposition and by H. Rim for Takeshima deposition (1.00); search near duplicate and duplicate documents with translation (1.10); e-mail to R. Noh to send out translation requests (0.40); check status of certified translations to be finalized for Kondo deposition (0.70); proofread Korean -> English draft translations for Donny Lee deposition (4.60).	425.00	7.80	3,315.00	Billable
10/16/2015 Richard Noh 207257 WORK	Update translation status per the request of S-Kim-Helms (1.00); prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (2.00); format excel translations per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30).	145.00	7.00	1,015.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/19/2015 206959	Shinae Kim-Helms WORK Proofread Korean -> English draft translations for Donny Lee deposition (4.40); e-mails with M. Pilotin regarding availability of Korean language review team (1.20); e-mails with S. Nozaki regarding draft translation to proofread (1.20); review Deposition Protocol (1.20); e-mails with R. Noh regarding same (0.40); e-mails with B. Troxel regarding issue with NEC production (0.40).	425.00	8.80	3,740.00	Billable
10/19/2015 207258	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (0.50); format excel translations per the request of S. Kim-Helms (0.60); email correspondence with translation company regarding revisions to translations (0.20).	145.00	3.50	507.50	Billable
10/20/2015 206960	Shinae Kim-Helms WORK Review email correspondences between R. Noh / A. Gooding and Consortra (0.40); e-mails with V. Glaze and J. Moy regarding translation requests and draft translation to proofread (0.40); confer with R. Noh and A. Gooding regarding certified translation status (0.50); review said status (1.20); e-mails with D. Lambrinos regarding translation status (0.40); e-mails with Y. Rha and H. Rim regarding availability of Korean language review team (1.20); review draft translations prepared translation company (1.20); coordinate among DPPs and IPPs to ensure accuracy (0.20); review and code documents identified by DPPs in preparation for Donny Lee deposition (2.40).	425.00	7.90	3,357.50	Billable
10/20/2015 207260	Richard Noh WORK Prepare foreign documents for translation (4.00); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (0.50); format excel translations per the request of S. Kim-Helms (0.50); update master translation tracking list with recent translations (0.50).	145.00	6.70	971.50	Billable
10/21/2015 206962	Shinae Kim-Helms WORK Review rush translation request by M. Caylao (0.30); analyze documents requested for rush translation (0.30); e-mails with N. Cihlar and R. Noh regarding same (0.20); check translation status (0.30); review email correspondences between R. Noh / A. Gooding and Consortra (0.30).	425.00	1.40	595.00	Billable
10/21/2015 207261	Richard Noh WORK Update translation status per the request of V. Glaze (1.00); review re-certified translations for accuracy per the request of N. Cihlar (0.30); prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.20); format excel translations per the request of S. Kim-Helms (1.00); email correspondence with translation company and DPPs regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.20).	145.00	7.20	1,044.00	Billable
10/22/2015 207072	Anna Gooding WORK Update master translation tracking list with recent translations (0.10); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.20); update Catalyst with new certified translations per request of S. Kim-Helms (0.30).	145.00	2.00	290.00	Billable
10/22/2015 207262	Richard Noh WORK Update translation status per the request of B. Troxel (0.50); prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (2.50); format excel translations per the request of S. Kim-Helms (1.00); email correspondence with translation company and DPPs regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.20).	145.00	7.50	1,087.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/23/2015 206964	Shinae Kim-Helms WORK Review email correspondences between R. Noh / A. Gooding and Consortra (0.20); teleconference with A. Gooding regarding urgent translation requests and draft translations to proofread (0.40); receive email by S. Scarlett regarding translation status (0.10); check said status (0.30); respond to same (0.40); e-mails with V. Glaze regarding outstanding draft translation to proofread (0.40).	425.00	1.80	765.00	Billable
10/23/2015 207074	Anna Gooding WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (3.20); email correspondence with translation company regarding the same (0.30); update Catalyst with new certified translations per request of S. Kim-Helms (0.50).	145.00	5.00	725.00	Billable
10/26/2015 206965	Shinae Kim-Helms WORK Review email correspondences between A. Gooding and Consortra (0.10); e-mails with C. Lovell regarding translation status (0.20); e-mails with A. Gooding regarding status of urgent translation requests and other translation related issues (0.20).	425.00	0.50	212.50	Billable
10/26/2015 207076	Anna Gooding WORK Update master translation tracking list with recent translations (1.50); email correspondence with translation company regarding revisions to translations (0.60); review certified translations for formatting accuracy (3.20); email correspondence with translation company regarding the same; update Catalyst with new certified translations per request of S. Kim-Helms (0.50).	145.00	5.80	841.00	Billable
10/27/2015 207077	Anna Gooding WORK Update master translation tracking list with recent translations (1.50); email correspondence with translation company regarding revisions to translations (1.20); review certified translations for formatting accuracy (2.50); email correspondence with translation company regarding the same (0.30).	145.00	5.50	797.50	Billable
10/27/2015 207286	Shinae Kim-Helms WORK E-mails with C. Lovell and M. Caylao regarding translation status (0.40); review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.30); e-mails with A. Gooding and R. Noh regarding translation status (0.40); review PowerPoint documents with technical issues, sent by Y. Rha (0.70); receive translation requests from J. Moy for Kondo deposition (0.50); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.50); [redacted] (0.50); review requested documents and search for duplicates and near duplicates with available translation (0.50); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.50).	425.00	6.80	2,890.00	Billable
10/28/2015 207079	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.50); email correspondence with translation company regarding the same (0.30).	145.00	3.50	507.50	Billable
10/28/2015 207289	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from J. Moy for Tachihara deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); e-mails with V. Glaze regarding outstanding revisions assigned to DPPs (0.40); e-mails with S. Nagano and Y. Rha regarding draft translations to proofread (1.00).	425.00	4.20	1,785.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/28/2015 207297	Richard Noh WORK Format excel translations per the request of S. Kim-Helms (2.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.50).	145.00	4.50	652.50	Billable
10/29/2015 207081	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10).	145.00	1.50	217.50	Billable
10/29/2015 207291	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.30); update status in translation request chart (0.30); e-mails with A. Gooding and R. Noh regarding translation status (0.30); e-mails with V. Glaze regarding outstanding revision assigned to DPPs (0.30).	425.00	1.20	510.00	Billable
10/29/2015 207298	Richard Noh WORK Update translation status per the request of V. Glaze (0.50); format foreign originals to match translations per the request of S. Kim-Helms (2.00); format excel translations per the request of S. Kim-Helms (3.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30).	145.00	7.50	1,087.50	Billable
10/30/2015 207084	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.50).	145.00	3.00	435.00	Billable
10/30/2015 207292	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); e-mails with A. Gooding and R. Noh regarding translation status (0.40); teleconference with R. Noh regarding image quality in translations to be certified by translation company (0.50); e-mails with D. Lambrinos regarding status of certified translations requested for Kondo deposition (0.40); receive translation requests from J. Moy for Kondo and Tachihara depositions (0.50); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with A. Kikuchi regarding near duplicate documents with certified translation (0.40); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.30).	425.00	5.10	2,167.50	Billable
10/30/2015 207299	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (1.70); format excel translations per the request of S. Kim-Helms (1.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.50).	145.00	5.00	725.00	Billable
11/2/2015 207085	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.20); email correspondence with translation company regarding the same (0.50).	145.00	3.00	435.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/2/2015 207295	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.70); update status in translation request chart (0.70); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from J. Moy for Tachihara and Sumoto depositions (0.70); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); e-mail to Donny Lee deposition team status of certified requested for Lee deposition (0.40); receive translation requests from C. Lovell for WY Chung deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.00); e-mails with C. Lovell regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); [redacted] (0.40).	425.00	7.50	3,187.50	Billable
11/2/2015 207300	Richard Noh WORK Prepare foreign documents for translation (2.70); email correspondence with translation company regarding the same (0.20); format excel translations per the request of S. Kim-Helms (1.00); format foreign originals to match translations per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding revisions to translations (0.30); review re-certified translations to ensure all changes were implemented (1.00); update master translation tracking list with recent translations (0.50).	145.00	6.70	971.50	Billable
11/3/2015 207580	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (1.00); update status in translation request chart (1.00); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive and review draft translations prepared by translation company (1.40); coordinate among DPPs and IPPs translation teams to proofread (0.20); e-mails with S. Nagano and S. Nozaki regarding availability to proofread and to assign said draft translations (0.50); receive translation requests from J. Moy [redacted] (0.50); review requested documents and search for duplicates and near duplicates with available translation (1.00); e-mails with J. Moy regarding same (0.40); e- mails with R. Noh regarding translation status of said documents (0.40); e-mail to translation company to request rush translations (0.40).	425.00	7.20	3,060.00	Billable
11/3/2015 207605	Anna Gooding WORK Prepare foreign documents for translation request (1.00); update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding the same (0.10).	145.00	2.00	290.00	Billable
11/3/2015 207698	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.50); save and organize deposition exhibits (1.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.20); prepare foreign documents for translation (1.00); format excel translations per the request of S. Kim-Helms (1.00).	145.00	6.00	870.00	Billable
11/4/2015 207582	Shinae Kim-Helms WORK E-mails [redacted] (0.40); receive and review draft translations prepared by translation company (0.80); coordinate with DPPs and IPPs on managing review of the same (0.20); review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.20); e-mails with A. Gooding and R. Noh regarding translation status (0.40); e-mails with S. Nagano and S. Nozaki regarding draft translations to proofread (0.60); [redacted] and e-mails exchanges regarding same (0.70); receive translation requests from M. Caylao and J. Moy for Kondo deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with M. Caylao and J. Moy regarding same (0.40); receive translation requests from J. Moy [redacted] (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with J. Moy regarding same (0.20); instruct A. Gooding/R. Noh to send documents for translation (0.20); receive translation requests from D. Lambrinos for Sumoto deposition (0.20); review requested documents and search	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	for duplicates and near duplicates with available translation (0.20); e-mails with D. Lambrinos regarding same and instruct A. Gooding/R. Noh to send documents for translation (0.10).				
11/4/2015 207607	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.50).	145.00	2.00	290.00	Billable
11/4/2015 207699	Richard Noh WORK Prepare foreign documents for translation (3.50); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.70); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.50).	145.00	5.50	797.50	Billable
11/5/2015 207583	Shinae Kim-Helms WORK E-mails with S. Nozaki and S. Nagano regarding draft translations to proofread (0.40); [redacted] per C. Lovell and exchange emails regarding same (1.30); receive translation requests from M. Caylao for Kondo deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); instruct A. Gooding/R. Noh to send documents for translation (0.20); e-mails with S. Scarlett regarding [redacted] document review and translation status (0.40); receive and review draft translations prepared by translation company (0.40); coordinate with DPPs on managing review of the same (0.20); e-mails with V. Glaze regarding [redacted] (0.40); e- mails with R. Noh to [redacted] (0.40); e-mail to [redacted] deposition team regarding status of [redacted] translations (0.40); receive translation requests from J. Moy for [redacted] (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.50); e-mails with J. Moy regarding same (0.40).	425.00	7.00	2,975.00	Billable
11/5/2015 207609	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.20).	145.00	3.00	435.00	Billable
11/5/2015 207700	Richard Noh WORK Prepare translations for correction (2.30); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.50); format excel translations per the request of S. Kim-Helms (0.50).	145.00	5.00	725.00	Billable
11/6/2015 207584	Shinae Kim-Helms WORK Coordinate S. Nagano and S. Nozaki to translate portion untranslated by translation company (1.00); review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); teleconference with A. Gooding regarding incompletely translated portion by translation company (0.50); review draft translations from translation company (1.20); coordinate with DPPs on management and strategy for review of the same (0.20); e-mails with S. Scarlett regarding availability of Japanese language reviewers to proofread draft translations (0.40); e-mails with S. Scarlett and J. Choi regarding issues [redacted] (0.40); run searches for same (1.70); review documents resulted from said results (0.40).	425.00	7.00	2,975.00	Billable
11/6/2015 207613	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same	145.00	3.00	435.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.20).				
11/6/2015 207701	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.50); format foreign originals to match translations per the request of S. Kim-Helms (1.00).	145.00	5.00	725.00	Billable
11/9/2015 207585	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); e-mails with S. Nagano [redacted] (0.40); run searches for same in database (0.40); receive translation requests from V. Glaze for Kondo deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with V. Glaze regarding same (0.40); review draft translations prepared by translation company (0.90); coordinate with DPPs on management and strategy for review of the same (0.20); e-mails with Japanese language review team to assign draft translations to proofread (0.40); e-mails with Consortra regarding priority of outstanding translations to be finalized (0.40); search for documents [redacted] (1.00); e-mail summary of hot documents to S. Scarlett (0.40).	425.00	6.50	2,762.50	Billable
11/9/2015 207615	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.20).	145.00	3.00	435.00	Billable
11/9/2015 207702	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.30); format excel translations per the request of S. Kim-Helms (2.20).	145.00	5.50	797.50	Billable
11/10/2015 207586	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.50); e-mails with A. Gooding and R. Noh regarding translation status and formatting of excel documents [redacted] (0.40); e-mail with J. Moy regarding same (0.40); receive and review draft translations prepared by translation company (0.50); coordinate with DPPs on management and strategy for review of the same (0.20); emails with IPPs Japanese review team to assign said draft translations to proofread and correspondence with M. Caylao and D. Lambrinos regarding status of certified translations for Sumoto deposition (1.60); receive translation requests from D. Lambrinos and M. Caylao for Kondo and Sumoto depositions (0.50); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with D. Lambrinos and M. Caylao regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.20); e-mail with translation company regarding cancellation of existing request (0.40); search for documents [redacted] (1.00); review and code same (1.20).	425.00	8.90	3,782.50	Billable
11/10/2015 207703	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.50); email correspondence with translation company regarding the same (0.20); prepare foreign documents for translation (1.80); email correspondence with translation company regarding the same (0.10); format excel translations per the request of S. Kim-Helms (1.70).	145.00	7.00	1,015.00	Billable
11/11/2015 207587	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize	425.00	4.00	1,700.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translations requested for various depositions (0.60); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status and large excel files with multiple tabs (0.50); receive and briefly review draft translations prepared by translation company (0.40); coordinate same to DPPs and IPPs translation teams (0.10); emails with IPPs Japanese review team regarding [redacted] (0.40); [redacted] (1.20); e-mail to DPPs regarding status of certified translations [redacted] (0.40).				
11/11/2015 Anna Gooding 207617 WORK	Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.20).	145.00	3.00	435.00	Billable
11/11/2015 Richard Noh 207704 WORK	Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translation (0.30); format foreign originals to match translations per the request of S. Kim-Helms (1.50); format excel translations per the request of S. Kim-Helms (1.00).	145.00	4.50	652.50	Billable
11/12/2015 Shinae Kim-Helms 207589 WORK	Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.50); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive and review draft translations prepared by translation company (0.30); coordinate among DPPs and IPPs translation teams (0.20); emails with IPPs Japanese review team to ensure accuracy of said draft translations to proofread (0.20); receive email from M. Perona regarding revisions needed to existing informal translations (0.40); e-mail to DPPs and IPPs Japanese review team to ensure accuracy of informal translations (0.20); e-mails with V. Glaze regarding [redacted] document list (0.40); receive translation requests from H. Rim for Tachihara deposition (0.20); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with H. Rim regarding same (0.40); search for potential YW Chung exhibits in database (0.40).	425.00	4.20	1,785.00	Billable
11/12/2015 Anna Gooding 207618 WORK	Prepare foreign documents for translation request (1.50); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.20).	145.00	4.50	652.50	Billable
11/12/2015 Richard Noh 207705 WORK	Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.70); format excel translations per the request of S. Kim-Helms (2.00).	145.00	6.00	870.00	Billable
11/13/2015 Shinae Kim-Helms 207591 WORK	Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.20); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from V. Glaze and A. Sheanin for Sumoto deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with V. Glaze regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.20); search [redacted] (1.00); review same (1.00); [redacted] (0.50); circulate same to S. Scarlett and J. Choi (0.20).	425.00	6.00	2,550.00	Billable
11/13/2015 Anna Gooding 207619 WORK	Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for	145.00	2.00	290.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	formatting accuracy (0.50); email correspondence with translation company regarding the same (0.50).				
11/13/2015 207706	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.80); format foreign originals to match translations per the request of S. Kim-Helms (2.00); prepare foreign documents for translation (0.90); email correspondence with translation company regarding the same (0.10).	145.00	4.00	580.00	Billable
11/16/2015 207593	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from H. Rim for Tachihara deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.60); e-mails with H. Rim regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.20); search for Chung phone records per S. Scarlett (2.80).	425.00	6.80	2,890.00	Billable
11/16/2015 207620	Anna Gooding WORK Prepare foreign documents for translation request (2.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same (0.50).	145.00	6.50	942.50	Billable
11/16/2015 207707	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); format foreign originals to match translations per the request of S. Kim-Helms (0.50); prepare foreign documents for translation (0.30); email correspondence with translation company regarding the same (0.10).	145.00	1.00	145.00	Billable
11/17/2015 207595	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive and briefly review draft translations prepared by translation company (0.40); coordinate strategy to DPPs translation management team (0.20); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (1.20); search for [redacted] per S. Scarlett (0.40); [redacted] (0.20); receive translation requests from V. Glaze and H. Rim for Takeshima and Tachihara depositions (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.00); instruct A. Gooding/R. Noh to send documents for translation (0.20); [redacted] (2.40).	425.00	7.80	3,315.00	Billable
11/17/2015 207708	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); prepare foreign documents for translation (0.50); email correspondence with translation company regarding the same (0.10); format excel translations per the request of S. Kim-Helms (1.10).	145.00	3.00	435.00	Billable
11/17/2015 207729	Anna Gooding WORK Update master translation tracking list with recent translations (1.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	145.00	4.50	652.50	Billable
11/18/2015 207597	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.20); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from V. Glaze, J. Moy and H. Rim for Takeshima and Tachihara depositions (0.20); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with V. Glaze, H. Rim. J. Moy regarding same (0.20); instruct A. Gooding/R. Noh to send documents for translation (0.20); [redacted] (0.40); review e-mails between J. Shannon, S. Scarlett and J. Choi regarding [redacted] (0.40); [redacted] (0.80); e-mails with S. Scarlett regarding [redacted] (0.40); search documents [redacted] (1.00); review same (0.40); e-mails with S. Scarlett regarding [redacted] (0.40); proofread LGC draft translations to be used in YW Chung deposition (0.40); e-mails with H. Rim and L. Chan regarding time frame to finalize Takeshima depositions (0.40); discuss potential [redacted] exhibits with J. Choi and S. Scarlett (0.40); teleconference with A. Kikuchi regarding making revision to existing certified translation (0.40).				
11/18/2015 207709	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (1.70); format excel translations per the request of S. Kim-Helms (1.00).	145.00	4.00	580.00	Billable
11/18/2015 207730	Anna Gooding WORK Prepare foreign documents for translation request (1.50); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	145.00	6.00	870.00	Billable
11/19/2015 207710	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.50); format foreign originals to match translations per the request of S. Kim-Helms (3.40); format excel translations per the request of S. Kim-Helms (2.00).	145.00	6.00	870.00	Billable
11/19/2015 207734	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	145.00	2.50	362.50	Billable
11/20/2015 207600	Shinae Kim-Helms WORK Review email correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); receive and briefly review draft translations prepared by translation company (1.20); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (1.20); receive translation requests from J. Moy, H. Rim, and S. Scarlett for Tachihara, Takeshima and YW Chung depositions (0.40); review requested documents & search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy, H. Rim, and S. Scarlett regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); teleconference with L. Chan to discuss certified translation process (0.50); [redacted] (1.00); send summaries of same to S. Scarlett (0.30); emails with S. Nagano regarding same (0.40); prepare list of potential YW Chung deposition exhibits and [redacted] (0.20); circulate same to S. Scarlett and J. Choi (0.40); search database for hot documents (0.40); email [redacted] to J. Moy (0.40); email with J. Moy regarding same (0.20); proofread LGC draft translations to be used in YW Chung deposition (0.40).	425.00	10.00	4,250.00	Billable
11/20/2015 207711	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.60); email correspondence with translation company regarding revisions to translations (0.10); format foreign originals to match translations per the request of S. Kim-Helms (2.50); format excel translations per the request of S. Kim-Helms (1.80).	145.00	5.00	725.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/20/2015 207735	Anna Gooding WORK Prepare foreign documents for translation request (2.00); update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	145.00	7.00	1,015.00	Billable
11/21/2015 207601	Shinae Kim-Helms WORK Review revisions prepared by DPPs to draft translations for Sumoto and Tachihara depositions (0.40); e-mail same to translation company for second revisions (0.40); e-mails with H. Rim regarding correction to be made to finalized certified translations for Tachihara deposition (0.30).	425.00	1.10	467.50	Billable
11/22/2015 207602	Shinae Kim-Helms WORK Receive translation requests from J. Moy for Tachihara deposition (0.20); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with J. Moy regarding same (0.20); send out rush translation request to translation company (0.20).	425.00	0.80	340.00	Billable
11/23/2015 207603	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive and review draft translations prepared by translation company (0.50); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (1.20); receive translation correction requests from H. Rim for Tachihara deposition (0.40); e mails with M. Perona regarding informal translations prepared by DPPs (1.20); receive translation requests from J. Moy, D. Lambrinos and V. Glaze for Tachihara and Sumoto depositions (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy, D. Lambrinos, and V. Glaze regarding same (0.40); send translation request to translation company (0.40); [redacted] (0.40).	425.00	7.30	3,102.50	Billable
11/23/2015 207712	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); format excel translations per the request of S. Kim-Helms (0.80); prepare foreign documents for translation (1.50); update master translation tracking list with recent translations (0.70).	145.00	3.20	464.00	Billable
11/23/2015 207738	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (1.00).	145.00	4.00	580.00	Billable
11/24/2015 207713	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.30); email correspondence with translation company regarding the same (0.30); prepare foreign documents for translation (0.90); format excel translations per the request of S. Kim-Helms (2.20); update translation status per the request of S. Kim-Helms (1.10).	145.00	6.90	1,000.50	Billable
11/24/2015 207716	Shinae Kim-Helms WORK Review e-mails between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); teleconference with translation company regarding priority translations to finalize (0.50); e- mails with S. Scarlett regarding status of certified translations requested (0.40); e-mails with A.Gooding and R. Noh regarding translation status (0.40); e-mail to Sumoto and Tachihara deposition teams regarding status of certified translations for said depositions (0.40); receive and briefly review draft translations prepared by translation company (1.20); e-mails with Korean language review team regarding draft translations for YW Chung depo to proofread (0.40); proofread said LGC draft translation (0.40); [redacted] (1.50); receive translation requests from L. Chan for Takeshima deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with L. Chan	425.00	8.80	3,740.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); e-mails with V. Glaze [redacted] (0.40); review said translations (0.40); teleconference with C. Voigt regarding same (0.40).				
11/24/2015 207741	Anna Gooding WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.10).	145.00	4.40	638.00	Billable
11/25/2015 207714	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); update translation status per the request of S. Kim-Helms (0.50); format foreign originals to match translations per the request of S. Kim-Helms (1.50); format excel translations per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (0.60).	145.00	4.50	652.50	Billable
11/25/2015 207718	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive and briefly review draft translations prepared by translation company (1.20); coordinate strategy with DPPs translation management team (0.40); e-mails with IPPs revisors - S. Nagano, S. Nozaki, H. Rim, H. Hsu, J. Jeong and J. Choi - to proofread draft translations assigned to IPPs (1.20); proofread translations to be used for YW Chung deposition (1.60); receive rush translation requests from D. Lambrinos for Sumoto deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); e-mails with translation company regarding priority translations and time line to finalize said priority translations (0.40); e-mail to Sumoto and Tachihara deposition teams regarding updated status of translations to be finalized for said depositions (0.40).	425.00	8.80	3,740.00	Billable
11/25/2015 207743	Anna Gooding WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (2.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.20).	145.00	5.00	725.00	Billable
11/29/2015 207720	Shinae Kim-Helms WORK Briefly review revisions to draft translations prepared by IPPs and DPPs translation team (0.50); forward same to translation company (0.10).	425.00	0.60	255.00	Billable
11/30/2015 207715	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy; email correspondence with translation company regarding the same (2.80); update translation status per the request of S. Kim-Helms (0.20); format foreign originals to match translations per the request of S. Kim-Helms (1.00); format excel translations per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (0.30).	145.00	5.50	797.50	Billable
11/30/2015 207722	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (1.00); update status in translation request chart (1.00); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from S. Scarlett for YW Chung deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (2.50); e-mail to S. Scarlett regarding same (0.40); e-mails with translation company to correct finalized certified translation (0.60); e- mails with L. Chan regarding status of translations requested for Tachihara deposition (0.40).	425.00	6.70	2,847.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/1/2015 207936	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); teleconference with R. Noh regarding same (0.40); receive and briefly review draft translations prepared by translation company (1.20); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (1.20); proofread draft translation of YW Chung deposition exhibit (0.40); e-mails with L. Chan regarding Tachihara translations (0.40); receive translation requests from M. Caylao and D. Lambrinos for Sumoto deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with Caylao and D. Lambrinos regarding same (0.40); e-mail rush translation request to translation company (0.40); e-mails with translation company for formatting issues (0.40); review draft translations (0.40); e-mails with N. Cihlar regarding translations entered by DAPs (0.30).	425.00	7.50	3,187.50	Billable
12/1/2015 207967	Anna Gooding WORK Update master translation tracking list with recent translations (2.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.30).	145.00	4.00	580.00	Billable
12/1/2015 208062	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.80); email correspondence with translation company regarding the same (0.10); format excel translations per the request of S. Kim-Helms (2.90); update translation status per the request of S. Kim-Helms (0.30)	145.00	5.20	754.00	Billable
12/2/2015 207938	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (1.20); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from J. Moy and H. Rim for Takeshima, and Kondo depositions (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy and H. Rim regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.60); e-mails with D. Lambrinos regarding status of certified translations (1.00);receive and briefly review draft translations prepared by translation company (0.40); coordinate strategy with DPPs translation management team (0.10); e-mails with IPPs revisors - S. Nagano, H. Rim, and S. Nozaki - to proofread draft translations assigned to IPPs (0.30).	425.00	6.40	2,720.00	Billable
12/2/2015 207968	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.30).	145.00	3.00	435.00	Billable
12/2/2015 208063	Richard Noh WORK Prepare foreign documents for translation (1.60); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.10); format foreign originals to match translations per the request of S. Kim-Helms (0.90); format excel translations per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (0.40); update translation status per the request of S. Kim-Helms (0.30).	145.00	5.00	725.00	Billable
12/3/2015 207939	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (1.20); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from L. Chan and H. Rim for Tachihara deposition (1.00); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with L. Chan and H. Rim regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation	425.00	8.10	3,442.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.20); e-mails with D. Lambrinos regarding status of certified translations (0.40); receive and briefly review draft translations prepared by translation company (0.90); e-mails with IPPs revisor - T. Lee- to proofread draft translations assigned to IPPs (0.80); e-mails with L. Chan, H. Rim and J. Moy regarding translations entered by DAPs (0.40); e-mails with S. Scarlett regarding exhibit list (0.40); compare two competing versions of translations per S. Scarlett and provide analysis (0.40).				
12/3/2015 207970	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.90); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.10).	145.00	1.40	203.00	Billable
12/3/2015 208064	Richard Noh WORK Prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.70); format excel translations per the request of S. Kim-Helms (1.20); update master translation tracking list with recent translations (0.30); update translation status per the request of S. Kim-Helms (0.40).	145.00	6.90	1,000.50	Billable
12/4/2015 207941	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (1.20); update status in translation request chart (0.70); e-mails with A. Gooding and R. Noh regarding translation status (0.40); teleconference w/ R. Noh regarding issues with finalized certified translations (0.50); e-mails with S. Scarlett regarding similar named individuals in different Defendant companies (0.40); e-mails with S. Scarlett regarding YW Chung custodian file and potential exhibits (0.40); search database for potential YW Chung exhibit per S. Scarlett (0.40); e-mails with C. Lin regarding backup vendor (0.40); e-mails with DPPs regarding Takeshima deposition exhibits (0.40); check translation of grandfathered translation to be used as YW Chung deposition exhibit per S. Scarlett (0.40); e-mails with S. Scarlett regarding last minute LGC production related to YW Chung (0.40); review said production per S. Scarlett (0.40); review and analyze entries identifying as YW Chung as meeting attendee in LGC Supplemental Responses to Plaintiffs Interrogatories (1.50); search for documents identifying matching meetings (1.00); prepare analysis accordingly (1.00).	425.00	9.50	4,037.50	Billable
12/4/2015 207973	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00).	145.00	1.50	217.50	Billable
12/4/2015 208065	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.40); format excel translations per the request of S. Kim-Helms (1.60); update master translation tracking list with recent translations (0.80).	145.00	2.90	420.50	Billable
12/5/2015 207942	Shinae Kim-Helms WORK Continue to review said LGC production (1.20); e-mails with S. Scarlett regarding same (0.40); prepare summary of important documents produced in said LGC production (1.20); circulate same to S. Scarlett and team (0.40); prepare full translation of YW Chung resume per S. Scarlett (1.20); search for potential Chung exhibit in database per S. Scarlett (2.00).	425.00	6.40	2,720.00	Billable
12/6/2015 207943	Shinae Kim-Helms WORK Receive translation requests from J. Moy and S. Scarlett for Kondo and YW Chung depositions, respectively (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with J. Moy regarding same (0.40); proofread LGC grandfathered translation (0.40); prepare informal translation of YW Chung document (1.20); e-mail to translation company rush translation requests (0.40); e-mails with N. Cihlar regarding secondary translation vendor (0.40); e-mails with L. Chan regarding status of Takeshima translations (0.40).	425.00	4.80	2,040.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/7/2015 207944	Shinae Kim-Helms WORK	425.00	7.50	3,187.50	Billable
	E-mails with S. Nagano regarding certified translations entered at Tachihara depositions (0.40); review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for various depositions (0.40); teleconference with R. Noh regarding same (0.50); update status in translation request chart (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); e-mails with S. Scarlett regarding status of certified translations to be finalized for YW Chung deposition (0.40); e-mails with H. Rim regarding Tachihara translations and corrections that need to be made to same (0.40); proofread Korean -> English translation to be used at YW Chung deposition (1.00); prepare revision to same (1.20); review J. Chois analysis of LGC document (1.20); search for relevant documents and prepare analysis (1.20).				
12/7/2015 208066	Richard Noh WORK	145.00	3.90	565.50	Billable
	Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00); format foreign originals to match translations per the request of S. Kim-Helms (1.80); format excel translations per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (0.10); update translation status per the request of S. Kim-Helms (0.20).				
12/8/2015 207946	Shinae Kim-Helms WORK	425.00	6.50	2,762.50	Billable
	Review e-mail correspondences between translation company and A. Gooding/R. Noh to finalize translations requested for YW Chung, Tachihara and Kondo depositions (0.40); update status in translation request chart (0.10); e-mails with A. Gooding and R. Noh regarding translation status (0.40); receive translation requests from M. Caylao and D. Lambrinos for Kondo deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.10); e-mails with M. Caylao and D. Lambrinos regarding same (0.40); instruct A. Gooding/R. Noh to send documents for translation (0.40); e-mails with S. Scarlett regarding status of rush translations (0.40); revise translation status chart accordingly (0.10); receive translation requests from J. Moy, M. Caylao, D. Lambrinos for Kondo deposition (0.10); review requested documents and search for duplicates and near duplicates with available translation (0.30); e-mails with J. Moy, M. Caylao, D. Lambrinos regarding same (0.40); review translation list forwarded by S. Scarlett (1.20); e-mails with R. Noh to update translation status (0.40); search for duplicates and near duplicates with available translation (0.10); e-mail finalized list to S. Scarlett (0.30).				
12/8/2015 207975	Anna Gooding WORK	145.00	1.00	145.00	Billable
	Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.30); email correspondence regarding the same per request of S. Kim-Helms (0.10).				
12/8/2015 208067	Richard Noh WORK	145.00	6.50	942.50	Billable
	Prepare foreign documents for translation (3.10); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.50); update translation status per the request of S. Kim-Helms (0.50).				
12/9/2015 207947	Shinae Kim-Helms WORK	425.00	7.50	3,187.50	Billable
	Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (1.00); update status in translation request chart (0.60); e-mails with R. Noh regarding translation status (0.40); receive translation requests and translation correction requests from D. Lambrinos, H. Rim and L. Chan for Kondo deposition (1.00); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with D. Lambrinos, H. Rim and L. Chan regarding same (0.40); instruct R. Noh to send documents for translation (0.40); e-mails with S. Scarlett regarding deposition translation requests (0.80); receive and briefly review draft translations prepared by translation company (1.20); coordinate strategy to DPPs translation management team (0.10); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (0.40).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/9/2015 208069	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.10); format foreign originals to match translations per the request of S. Kim-Helms (1.30); format excel translations per the request of S. Kim-Helms (1.50); update master translation tracking list with recent translations (0.40).	145.00	5.50	797.50	Billable
12/10/2015 207948	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); e-mails and teleconferences with R. Noh regarding translation status (0.50); receive and briefly review draft translations prepared by translation company (1.20); coordinate strategy with DPPs translation management team (0.10); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (0.50); e-mails with V. Glaze regarding status of proofreading (0.40); review JJ Joe documents in database (1.50); prepare brief background memorandum on JJ Joe of LGC (1.20); e-mail to Kondo deposition team with status of certified translations requested for Kondo (0.40).	425.00	6.80	2,890.00	Billable
12/10/2015 208070	Richard Noh WORK Format foreign originals to match translations per the request of S. Kim-Helms (3.20); format excel translations per the request of S. Kim-Helms (2.50); update master translation tracking list with recent translations (0.30).	145.00	6.00	870.00	Billable
12/11/2015 207949	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.50); e-mails and teleconferences with R. Noh regarding translation status (0.50); receive and briefly review draft translations prepared by translation company (0.50); coordinate strategy with DPPs translation management team (0.10); e-mails with S. Nagano, T. Lee and S. Nozaki to proofread draft translations assigned to IPPs (1.20); review JJ Joe documents in database (1.20); prepare brief background memorandum on JJ Joe of LGC (1.20); e-mail to Kondo deposition team with status of certified translations requested for Kondo (0.40); review documents relating to MH Kim of LGC available in database per S. Scarlett (1.20).	425.00	7.20	3,060.00	Billable
12/11/2015 208071	Richard Noh WORK Prepare foreign documents for translation (2.90); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.80); update master translation tracking list with recent translations (0.80).	145.00	6.90	1,000.50	Billable
12/14/2015 207950	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.50); update status in translation request chart (0.50); e-mails &conferences with R. Noh regarding translation status (0.20); receive and briefly review draft translations prepared by translation company (0.50); coordinate strategy with DPPs translation management team (0.10); e-mails with S. Nagano to proofread draft translations assigned to IPPs (0.50); receive translation requests from S. Scarlett [redacted] (1.20); review requested documents and search for duplicates and near duplicates with available translation (1.00); provide S.Scarlett with results of searches (0.20).	425.00	4.70	1,997.50	Billable
12/14/2015 208072	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.50); format foreign originals to match translations per the request of S. Kim-Helms (1.50); format excel translations per the request of S. Kim-Helms (1.40); update master translation tracking list with recent translations (0.30).	145.00	4.80	696.00	Billable
12/15/2015 207952	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.30); update status in translation request chart (0.30); e-mails	425.00	3.50	1,487.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	with R. Noh regarding translation status (0.40); e-mails with IPPs revisors - S. Nagano and S. Nozaki - to proofread draft translations assigned to IPPs (0.40); receive translation requests from D. Lambrinos for Kondo deposition (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with D. Lambrinos and M. Caylao regarding same (0.40); e-mails with J. Moy regarding issues with certified translations (0.40); prepare partial translation of Panasonic document (0.10); e-mail to Kondo deposition team status of certified translations requested for Kondo deposition (0.40).				
12/15/2015 208073	Richard Noh WORK Prepare foreign documents for translation and exchange emails regarding same (3.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.90); format foreign originals to match translations per the request of S. Kim-Helms (1.20); format excel translations per the request of S. Kim-Helms (0.30); update master translation tracking list with recent translations (0.20).	145.00	5.90	855.50	Billable
12/16/2015 207954	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and Kondo deposition (0.20); update status in translation request chart (0.20).	425.00	0.40	170.00	Billable
12/16/2015 208074	Richard Noh WORK Review certified translations for formatting accuracy (2.40); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.40).	145.00	3.00	435.00	Billable
12/17/2015 207956	Shinae Kim-Helms WORK E-mails with R. Noh regarding status of last certified translation to be finalized for Kondo deposition (0.40); e-mails with J. Moy, S. Scarlet and A. Sheanin regarding Defendants request of full translation of SDI documents (0.40); e-mails with S. Scarlett regarding SDI document to be informally translated (0.40); search database for duplicate document in native version (0.40); e-mail to Japanese language review team to assign full translation of said SDI document per S. Scarlett (0.90).	425.00	2.50	1,062.50	Billable
12/17/2015 208076	Richard Noh WORK Update master translation tracking list with recent translations (1.00); tag translations on Catalyst per the request of S. Kim-Helms (2.00).	145.00	3.00	435.00	Billable
12/18/2015 207960	Shinae Kim-Helms WORK E-mails with S. Nozaki and S. Nagano regarding translation assignment (0.20); e-mails with Consortra regarding potential translation request and fee estimates (0.20); e-mails with S. Scarlett regarding exhibit list (0.10).	425.00	0.50	212.50	Billable
12/18/2015 208078	Richard Noh WORK Save and organize deposition exhibits per the request of S. Kim-Helms (0.90); update master translation tracking list with recent translations (0.10).	145.00	1.00	145.00	Billable
12/20/2015 207962	Shinae Kim-Helms WORK Receive translation requests from S. Scarlett [redacted] (0.10); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with S. Scarlett regarding same (0.10).	425.00	0.40	170.00	Billable
12/21/2015 207963	Shinae Kim-Helms WORK E-mails with V. Glaze regarding Panasonics retrieval of documents (0.50); check translation status (0.80); teleconference with N. Cihlar, R. Noh and A. Gooding regarding updating exhibit list and collecting translations entered by Defendants and DAPs (1.20); search for and review JJ Joe documents (2.00).	425.00	4.50	1,912.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/21/2015 208079	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30); tag translations on Catalyst per the request of S. Kim-Helm (1.50).	145.00	4.00	580.00	Billable
12/22/2015 207981	Anna Gooding WORK Update deposition exhibit index with foreign entered exhibits from docket per request of S. Kim-Helms.	145.00	1.50	217.50	Billable
12/22/2015 208054	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with R. Noh regarding translation status (0.40); receive and briefly review draft translations prepared by translation company (0.40); e- mails with IPPs reviewers - T. Lee and S. Nozaki - to proofread draft translations assigned to IPPs (1.60); e-mails with S. Scarlett regarding time line to finalize said certified translations (0.40); receive translation requests from V. Glaze for class certification brief (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with V. Glaze regarding same (0.40); instruct R. Noh to send documents for translation (0.40); e-mails with V. Glaze regarding destroying Panasonic claw back documents (0.20); destroy same (0.20); proofread English translation of LGC document drafted by translation company (0.20); prepare revision to same (0.20).	425.00	6.80	2,890.00	Billable
12/22/2015 208081	Richard Noh WORK Prepare foreign documents for translation (1.10); email correspondence with translation company regarding the same (0.10); delete and edit translations due to Defendant clawback per the request of S. Kim-Helms (1.70); update master translation tracking list with recent translations (0.10).	145.00	3.00	435.00	Billable
12/23/2015 208056	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.40); e-mails with R. Noh regarding translation status (0.40); receive and briefly review draft translations prepared by translation company (1.20); e- mails with T. Lee to proofread draft translations assigned to IPPs (0.40); proofread English translation of LGC document drafted by translation company (2.00); prepare revision to same (0.70).	425.00	5.50	2,337.50	Billable
12/24/2015 208058	Shinae Kim-Helms WORK Receive and briefly review draft translations prepared by translation company (0.30); coordinate with T. Lee regarding draft translation to proofread (0.20).	425.00	0.50	212.50	Billable
12/28/2015 208083	Richard Noh WORK Review certified translations for formatting accuracy and email correspondence with translation company regarding the same (2.70); update master translation tracking list with recent translations (1.30).	145.00	4.00	580.00	Billable
12/29/2015 208059	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.40); update status in translation request chart (0.20); e-mails with R. Noh regarding translation status (0.20); receive translation requests from A. Kikuchi for class certification brief (0.20); review requested documents and search for duplicates and near duplicates with available translation (0.20); e-mails with A. Kikuchi regarding same (0.20); send translation request to Consortra (0.40); e-mails with L. Chan regarding destruction of Panasonic claw back documents and translations thereof (0.40).	425.00	2.20	935.00	Billable
12/30/2015 208060	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for various depositions (0.20); update status in translation request chart (0.20); e-mails with R. Noh regarding translation status (0.40); e-mails with S. Scarlett regarding status of certified translations requested [redacted] (0.30); prepare zip folder of finalize translations per S. Scarlett	425.00	2.50	1,062.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.20); e-mails with DPPs regarding status of proofreading of draft translations (1.20).				
12/30/2015 208084	Richard Noh WORK Prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.90); email correspondence with translation company regarding the same (0.10); update translation status per the request of S. Kim-Helms (0.30); update master translation tracking list with recent translations (0.50).	145.00	6.00	870.00	Billable
1/3/2016 208246	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding status of master exhibit list (0.10); e-mails to R. Noh and A. Gooding regarding same (0.10); e-mails with L. Chan regarding corrections needed to finalized certified translations (0.10); receive translation requests from J. Moy for class certification brief (0.10); review requested documents and search for duplicates and near duplicates with available translation and exchange e-mails with J. Moy regarding same (0.30); send certified translation request to translation company (0.10).	425.00	0.80	340.00	Billable
1/4/2016 208085	Richard Noh WORK Review certified translations for formatting accuracy (3.10); update master translation tracking list with recent translations (0.70).	155.00	3.80	589.00	Billable
1/4/2016 208247	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.10); update status in translation request chart (0.40); e-mails with R. Noh regarding translation status (0.40); e-mails with L. Chan and H. Rim regarding updated versions of finalized certified translations (0.40); teleconference with R. Noh regarding same (0.50); receive and briefly review draft translations prepared by translation company (1.20); per H. Rims request, search for and review documents relating Nokias customers in 2008 (0.40); e-mails with H. Rim and L. Chan regarding same (0.40); proofread draft translation of LGC document prepared by Consortra (1.20).	425.00	6.00	2,550.00	Billable
1/5/2016 208249	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.20); update status in translation request chart (0.40); e-mails with R. Noh regarding translation status (0.40); receive and briefly review draft translations prepared by translation company (1.20); e-mails with S. Nozaki to proofread draft translations assigned to IPPs (1.20); e-mails with R. Noh regarding exhibit list (0.40); receive translation requests from D. Lambrinos for class cert brief (0.40); review requested documents and search for duplicates and near duplicates with available translation (0.40); e-mails with D. Lambrinos regarding length of document and cost (0.40); search for and review JJ Joe documents in database (0.40).	425.00	6.40	2,720.00	Billable
1/5/2016 208478	Richard Noh WORK Prepare foreign documents for translation (3.40); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.60); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30); update master exhibit list (0.30).	155.00	6.00	930.00	Billable
1/6/2016 208252	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.20); update status in translation request chart (0.70); e-mails with R. Noh regarding translation status (0.40); e-mails with D. Lambrinos regarding potential document requested for certified translation (0.40); e-mails with L. Chan regarding request to fix bates numbers in old certified translations (0.40); e-mail instructions to R. Noh regarding same (0.30); receive translation requests from J. Moy for class cert brief (0.50); review requested documents (1.00); e-mails with J. Moy regarding same (0.40); send translation request to translation company (0.10); proofread Korean to English draft translations (1.00).	425.00	6.40	2,720.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/6/2016 208479	Richard Noh WORK Prepare foreign documents for translation (1.70); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.80); update master exhibit list (1.00).	155.00	3.80	589.00	Billable
1/6/2016 208498	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.50).	155.00	2.30	356.50	Billable
1/7/2016 208255	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.20); update status in translation request chart (0.40); e-mails with R. Noh regarding translation status (0.40); e-mails with D. Lambrinos regarding translation of lengthy document, cost and time (0.40); e-mails with A. Gooding and R. Noh regarding status of master exhibit list (0.40); proofread Korean to English draft translations (2.00); search for JJ Joe documents and review same in database (2.00).	425.00	6.80	2,890.00	Billable
1/7/2016 208480	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (3.30); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.50); update master exhibit list (0.60).	155.00	4.60	713.00	Billable
1/7/2016 208500	Anna Gooding WORK Update master translation tracking list with recent translations(0.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.10).	155.00	1.00	155.00	Billable
1/8/2016 208256	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.80); update status in translation request chart (1.00); receive and briefly review draft translations prepared by translation company (1.50); e-mails with T. Lee and S. Nagano to proofread draft translations assigned to IPPs (1.20); e-mail status of certified translations requested for class certification brief to IPPs and DPPs translation management teams (0.40); e-mails with R. Noh regarding status of master exhibit list (0.40).	425.00	6.30	2,677.50	Billable
1/8/2016 208481	Richard Noh WORK Update master exhibit list.	155.00	4.00	620.00	Billable
1/8/2016 208501	Anna Gooding WORK Find foreign exhibits from docket and creating master exhibit list per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
1/9/2016 208258	Shinae Kim-Helms WORK Receive translation requests from J. Moy for class certification brief (0.10); review requested documents (0.20); e-mails with J. Moy regarding same (0.10); send said translation request to translation company (0.10).	425.00	0.50	212.50	Billable
1/11/2016 208259	Shinae Kim-Helms WORK E-mails with R. Noh regarding status of master exhibit list (0.40); review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.20); update status in translation request chart (0.40); receive translation requests from V. Glaze for class certification brief (0.40); review requested documents and search for duplicates and near duplicates with available translation (1.20); e-mails with V. Glaze regarding same (0.40); proofread Korean to English draft translation prepared by translation company (3.00).	425.00	7.00	2,975.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/11/2016 208482	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.80); email correspondence with translation company regarding the same (0.10); format excel translations per the request of S. Kim-Helms (1.00); update master exhibit list (2.00).	155.00	6.00	930.00	Billable
1/11/2016 208503	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	155.00	4.00	620.00	Billable
1/12/2016 208262	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (0.40); update status in translation request chart (0.40); receive translation requests from V. Glaze for class certification brief (0.40); review requested documents (1.00); e-mails with V. Glaze regarding same (0.40); e-mail to R. Noh regarding same (0.40); e-mails with R. Noh regarding redacted versions of exhibits in docket, status of exhibit list, and translations entered by Defendants and DAPs to be uploaded to shared site (0.40); e-mails with V. Glaze to discuss LGC document potentially requested for certified translation in preparation for class certification brief (0.40); review and revise draft translation of LGC document prepared by translation company (2.20); review documents cited in class certification brief and check translation status thereof per D. Lambrinos (2.00); e-mails with D. Lambrinos regarding same (0.20).	425.00	8.20	3,485.00	Billable
1/12/2016 208483	Richard Noh WORK Prepare foreign documents for translation (1.50); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (1.50); update master exhibit list (1.00).	155.00	5.40	837.00	Billable
1/13/2016 208265	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.50); update status in translation request chart (0.40); receive and briefly review draft translations prepared by translation company (1.20); e-mails with reviewers to proofread draft translations assigned to IPPs (1.20); e-mails with R. Noh and A. Gooding regarding master exhibit chart (0.40); e-mails with N. Cihlar and R. Noh regarding scope of exhibits found in docket (0.40); e-mail to IPPs and DPPs translation management team regarding status of certified translations requested for class certification brief (0.40); e-mails with B. Miller for correct bates numbers of documents to be cited in class certification brief (0.40); e-mails with L. Chan regarding unredacted versions of exhibits filed in dockets (0.40).	425.00	6.30	2,677.50	Billable
1/13/2016 208484	Richard Noh WORK Prepare foreign documents for translation (1.10); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (1.00); update master exhibit list (1.50).	155.00	4.00	620.00	Billable
1/14/2016 208267	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh to finalize translations requested for class certification brief (1.20); update status in translation request chart (0.40); e- mails with R. Noh and A. Gooding regarding master exhibit chart (0.40); e-mails with C. Lovell regarding unredacted version of exhibits (0.40); review and revise master exhibit list (1.20).	425.00	3.60	1,530.00	Billable
1/14/2016 208485	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.70); update master translation tracking list with recent translations (1.60); update master exhibit list (1.30).	155.00	4.90	759.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/14/2016 208509	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50).	155.00	1.70	263.50	Billable
1/15/2016 208486	Richard Noh WORK Update master exhibit list.	155.00	4.00	620.00	Billable
1/15/2016 208511	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email exchanges with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.30); correspondence with translation company regarding the same per request of S. Kim-Helms (0.10).	155.00	1.00	155.00	Billable
1/18/2016 208487	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.00); format excel translations per the request of S. Kim-Helms (3.00); update master exhibit list (0.80).	155.00	5.90	914.50	Billable
1/19/2016 208488	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.10); format excel translations per the request of S. Kim-Helms (2.90); update master exhibit list (0.70).	155.00	4.90	759.50	Billable
1/19/2016 208515	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	3.00	465.00	Billable
1/20/2016 208489	Richard Noh WORK Update master exhibit list (1.50); update master translation tracking list with recent translations (1.50).	155.00	3.00	465.00	Billable
1/20/2016 208517	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	2.50	387.50	Billable
1/21/2016 208490	Richard Noh WORK Update master exhibit list (1.40); update master translation tracking list with recent translations (1.20); save and organize new exhibits per the request of S. Kim-Helms (1.40).	155.00	4.00	620.00	Billable
1/22/2016 208491	Richard Noh WORK Save and organize new exhibits per the request of S. Kim-Helms (0.80); update master translation tracking list with recent translations (0.30); tag translations on Catalyst per the request of S. Kim-Helms (0.90).	155.00	2.00	310.00	Billable
1/22/2016 208519	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
1/25/2016 208492	Richard Noh WORK Update master translation tracking list with recent translations.	155.00	1.00	155.00	Billable
1/26/2016 208494	Richard Noh WORK Prepare foreign documents for translation (0.40); email correspondence with translation company regarding the same (0.10).	155.00	0.50	77.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/26/2016 208569	Shinae Kim-Helms WORK Receive and review documents requested for certified translation by V. Glaze (0.20); search for duplicates and near duplicates with translation available in database (0.20); e-mails with V. Glaze regarding same (0.20); e-mail R. Noh instruction to send request for said certified translation (0.20).	425.00	0.80	340.00	Billable
1/28/2016 208496	Richard Noh WORK Update master translation tracking list with deposition exhibits.	155.00	3.00	465.00	Billable
1/28/2016 208574	Shinae Kim-Helms WORK Prepare informal translation of LGC document [redacted] (4.70); briefly review draft translations prepared by translation company (1.20); split said translations with DPPs for proofreading (0.20); e-mails T. Lee to proofread said translations assigned to IPPs (0.40).	425.00	6.50	2,762.50	Billable
1/29/2016 208497	Richard Noh WORK Update master translation tracking list with deposition exhibits (0.60); delete and edit translations due to Defendant clawback per the request of S. Kim-Helms (2.30); email correspondence with translation company regarding the same (0.10).	155.00	3.00	465.00	Billable
1/29/2016 208576	Shinae Kim-Helms WORK Circulate informal translation of LGC document to translation management team (0.20); e-mails with V. Glaze regarding Toshiba production issues (0.20); e-mails with R. Noh regarding translation status (0.20); e-mails with V. Glaze regarding clawed back documents (0.40).	425.00	1.00	425.00	Billable
2/1/2016 208579	Shinae Kim-Helms WORK Review e-mail correspondences between translation company and R. Noh regarding deletion of clawed back documents and finalization of certified translations requested for Noll report (2.00); e-mails with B. Miller and B. Troxel regarding issues with Toshiba production (0.40); review Korean language documents listed Shimizu hot document index prepared by Sawa (2.10).	425.00	4.50	1,912.50	Billable
2/1/2016 209051	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.80); update master translation tracking list with recent translations (0.50).	155.00	2.40	372.00	Billable
2/2/2016 209018	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	155.00	3.00	465.00	Billable
2/2/2016 209052	Richard Noh WORK Prepare foreign documents for translation (2.20); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (1.00); update translation status per the request of S. Kim-Helms (0.80).	155.00	4.50	697.50	Billable
2/2/2016 209085	Shinae Kim-Helms WORK E-mails with DPPs regarding translations to be proofread for Knoll report (0.40); conduct searches for LGC and SDI documents implicating Shimizu of Panasonic (0.40); review results from said searches (1.20); receive request for certified translation of said results from D. Lambrinos in preparation for Shimizu deposition (0.80); e-mails with D. Lambrinos and S. Nagano regarding same (0.40); e-mail A. Gooding and R. Noh instructions to request said certified translation (0.40); e-mails with V. Glaze, B. Miller and B. Troxel regarding issues with Toshiba production (0.40); e-mails with B. Clark regarding translation status of documents to be translated in preparation for Sawai deposition (0.40); e-mail instructions to check translation status of said documents to R. Noh and A. Gooding (0.40); receive and review documents requested for rush certified translation in preparation	425.00	8.00	3,400.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	for JJ Joe deposition from S. Scarlett (1.20); review said documents and search for near duplicates and duplicates with translation available (1.20); e-mails with S. Scarlett regarding attachments of said documents (0.40); e-mail rush request of said translations to Consortra (0.40).				
2/3/2016 209055	Richard Noh WORK Prepare foreign documents for translation (1.50); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (1.10).	155.00	3.00	465.00	Billable
2/3/2016 209086	Shinae Kim-Helms WORK Receive and review documents requested for certified translation by S. Scarlett for deposition of JJ Joe (0.60); check translation status and search for documents with duplicates and near duplicates (0.60); review said documents (0.60); e-mail correspondences with S. Scarlett regarding same (0.40); e-mail Consortra (0.20); request to translate and certify said documents (0.40); e-mails with B. Troxel regarding issues with upload of LGC native files (0.40); review e-mail correspondences between R. Noh/A. Gooding and Consortra to finalize documents requested for Noll report (1.00); search and review e-mails related to JW Huh of LGC per D. Lambrinos and exchange e-mails with D. Lambrinos, S. Nagano and C. Hammarskjold regarding documents implicating JW Huh (2.10).	425.00	6.30	2,677.50	Billable
2/4/2016 209056	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.90); update master exhibit list (0.90).	155.00	5.00	775.00	Billable
2/4/2016 209090	Shinae Kim-Helms WORK Receive and briefly review draft translations prepared by Consortra (1.20); e-mails with DPPs regarding half of said translations to be proofed by DPPs (0.40); e-mails with R. Noh regarding certified translation request for native files (0.40); receive and review document requested for certified translation by D. Lambrinos for JW Huh deposition (1.20); search for near duplicate and duplicate documents in database (0.40); email R. Noh/A. Gooding instructions to send out translation request (0.40); e-mails with J. Moy regarding cell phone record storage period in Korea (0.40); receive and review email from D. Lambrinos regarding Defendants documents produced in multiple languages (0.40); teleconference with N. Cihlar (0.50); receive and review documents requested for certified translation by B. Clark for Sawai deposition (0.40); search for duplicate and near duplicate documents in database (0.40); e-mails with B. Clark regarding same (0.20); e-mail R. Noh and A. Gooding instructions to send out documents to Consortra for translation (0.20).	425.00	6.50	2,762.50	Billable
2/5/2016 209021	Anna Gooding WORK Check translation status and prepare foreign documents for translation (1.00), email correspondence with translation company regarding the same (0.50); update master tracking list with recent translations per request of S. Kim-Helms (1.50).	155.00	3.00	465.00	Billable
2/5/2016 209058	Richard Noh WORK Update master translation tracking list with recent translations (1.20); update master exhibit list (1.30).	155.00	2.50	387.50	Billable
2/5/2016 209092	Shinae Kim-Helms WORK Receive and briefly review draft translations prepared by Consortra for JJ Joe deposition (0.40); review e-mail correspondences between Consortra and A. Gooding/R. Noh to finalize outstanding translations (1.00); update translation chart accordingly (0.50); proofread draft translation of LGC document (3.80).	425.00	5.70	2,422.50	Billable
2/8/2016 209023	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); tag translations of Catalyst per request of S. Kim-Helms (1.00).	155.00	2.00	310.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/8/2016 209094	Shinae Kim-Helms WORK Proofread draft translations of LGC document requested for JJ Joe deposition (4.10); review e-mail correspondences between Consortra and A. Gooding/R. Noh to finalize outstanding translations (0.50); update translation chart accordingly (1.00).	425.00	5.60	2,380.00	Billable
2/9/2016 209025	Anna Gooding WORK Update master translation tracking list with translation descriptions per request of C. Voigt.	155.00	1.00	155.00	Billable
2/9/2016 209097	Shinae Kim-Helms WORK Review email correspondences between R. Noh/A. Gooding and Consortra to finalize certified translations requested in preparation for JJ Joe deposition (0.40); receive and briefly review draft translations prepared by Consortra (0.40); e-mails with DPPs to split proofreading (0.40); proofread draft translations of LGC documents (1.30); e-mails with A. Gooding regarding status of translations to be finalized (0.40); update translation tracking chart (0.40).	425.00	3.30	1,402.50	Billable
2/10/2016 209027	Anna Gooding WORK Review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	155.00	1.00	155.00	Billable
2/10/2016 209063	Richard Noh WORK Review certified translations for formatting accuracy (3.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.80).	155.00	4.00	620.00	Billable
2/10/2016 209100	Shinae Kim-Helms WORK Review email correspondences between R. Noh/A. Gooding and Consortra to finalize certified translations requested in preparation for JJ Joe and Sawai depositions (0.30); proofread draft translations of LGC documents requested in preparation of JJ Joe deposition (0.20).	425.00	0.50	212.50	Billable
2/11/2016 209102	Shinae Kim-Helms WORK Review email correspondences between R. Noh/A. Gooding and Consortra to finalize certified translations requested in preparation for JJ Joe and Sawai depositions (0.60); receive and review documents requested for translation by B. Clark in preparation for Sawai deposition (1.20); search for duplicates and near duplicates in database (0.40); instructions to A. Gooding/R. Noh to send out non-rush translation request to Consortra (0.40); proofread draft translations of LGC documents requested in preparation of JJ Joe deposition (1.20).	425.00	3.80	1,615.00	Billable
2/12/2016 209030	Anna Gooding WORK Review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable
2/12/2016 209066	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.00); update master translation tracking list with recent translations (0.70).	155.00	4.90	759.50	Billable
2/12/2016 209104	Shinae Kim-Helms WORK E-mails with C. Smith regarding draft translations of LGC documents to be proofread (0.40); proofread draft translations of LGC documents requested in preparation of JJ Joe deposition (2.40); receive and briefly review draft translations prepared by Consortra (1.20); email with DPPs regarding coordination and management issues for proofreading the same (0.40); e-mails with C. Brian regarding status of certified translations requested for Sawai deposition (0.40).	425.00	4.80	2,040.00	Billable
2/16/2016 209033	Anna Gooding WORK Review certified translations for formatting accuracy (1.00); email correspondence with translation	155.00	2.00	310.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	company regarding the same (0.10); update master tracking list with recent translations per request of S. Kim-Helms (0.90).				
2/16/2016 209068	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.40); format excel translations per the request of S. Kim-Helms (3.10); update master translation tracking list with recent translations (0.50).	155.00	4.00	620.00	Billable
2/16/2016 209111	Shinae Kim-Helms WORK E-mails with S. Scarlett regarding status of certified translations requested for JJ Joe deposition (0.30); review email correspondences between Consortra and A. Gooding/ Richard Noh to finalize translations requested for Sawai deposition (0.70); update translation tracking chart according (0.40).	425.00	1.40	595.00	Billable
2/17/2016 209036	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.50); finalize translations and tag on Catalyst per request of S. Kim-Helms (1.00).	155.00	2.70	418.50	Billable
2/17/2016 209070	Richard Noh WORK Update master translation tracking list with recent translations.	155.00	0.50	77.50	Billable
2/17/2016 209114	Shinae Kim-Helms WORK Review email correspondences between Consortra and A. Gooding/ Richard Noh to finalize translations requested for Sawai deposition (0.60); update translation tracking chart according (0.40); e-mails with A. Gooding and R. Noh regarding translation status (0.40); e-mails with C. Lovell regarding deposition exhibit chart (0.40); put together certified translations requested for JJ Joe deposition (0.40); forward same to S. Scarlett (0.40); receive and review documents requested for non-rush translation by B. Clark in preparation for Sawai deposition (1.20); search for duplicates and near duplicates in database (0.40); e-mail R. Noh/A. Gooding instructions to request said translations (0.40).	425.00	4.60	1,955.00	Billable
2/18/2016 209038	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (2.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); format foreign originals of recently certified excel documents per request of S. Kim-Helms (0.70).	155.00	3.90	604.50	Billable
2/18/2016 209072	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (4.00); update master translation tracking list with recent translations (0.20); format excel translations per the request of S. Kim-Helms (1.30); update master exhibit list per the request of S. Kim-Helms (0.30).	155.00	5.90	914.50	Billable
2/18/2016 209117	Shinae Kim-Helms WORK Receive and review requests for certified translation by B. Clark for Sawai deposition (0.60); search for duplicates and near duplicates in database (0.50); instructions to A. Gooding/R. Noh to send out said translation request (0.20); e-mails with R. Noh regarding status of outstanding certified translations requested for JJ Joe deposition and Sawai deposition (0.40); receive and review draft translations prepared by Consortra (0.60); emails with DPPs and T. Lee regarding coordination on proofreading said draft translations (0.80); teleconference with N. Cihlar regarding deposition exhibit charts and translations entered with Plaintiffs briefs (0.50).	425.00	3.60	1,530.00	Billable
2/19/2016 209040	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.00); correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.10).	155.00	1.80	279.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/19/2016 209074	Richard Noh WORK Prepare foreign documents for translation (2.60); email correspondence with translation company regarding the same (0.10); email correspondence with translation company and V. Glaze regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.00); update master translation tracking list with recent translations (1.10).	155.00	5.90	914.50	Billable
2/19/2016 209120	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding rush translation request for exhibit entered without certified translation (0.50); teleconference with R. Noh and A. Gooding regarding translations entered as exhibits to briefs and [redacted] reports (0.60).	425.00	1.10	467.50	Billable
2/22/2016 209041	Anna Gooding WORK Update master translation tracking list with docket exhibits (3.00); delete recently clawed back documents and correspond with translation company regarding the same per request of S. Kim-Helms (2.00).	155.00	5.00	775.00	Billable
2/22/2016 209075	Richard Noh WORK Update master exhibit list per the request of S. Kim-Helms (0.60); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); delete translations due to Defendant clawback per the request of S. Kim-Helms (0.80); email correspondence with translation company regarding the same (0.20); format excel translation per the request of S. Kim-Helms (0.60).	155.00	2.90	449.50	Billable
2/22/2016 209124	Shinae Kim-Helms WORK E-mails with R. Noh regarding updated deposition exhibit list (0.40); review, analysis, and update the same (1.50); e-mails with A. Gooding regarding translations entered as exhibits to briefs (0.40); e-mails with J. Moy and D. Lambrinos regarding documents clawed back by Panasonic (0.40); instructions to A. Gooding regarding same (0.40); e-mails with H. Rim regarding status of master translation tracking chart (0.20).	425.00	3.30	1,402.50	Billable
2/23/2016 209077	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.30); format excel translations per the request of S. Kim-Helms (0.60); update master translation tracking list with recent translations (0.70).	155.00	2.80	434.00	Billable
2/23/2016 209127	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.90); e-mails with T. Lee regarding translation of Japanese phrase (0.40); e-mails with J. Lee and L. Chan regarding potential exhibits for Sawai deposition (0.40).	425.00	1.70	722.50	Billable
2/24/2016 209043	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
2/24/2016 209078	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.90); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (2.50); update master translation tracking list with recent translations (1.60).	155.00	5.20	806.00	Billable
2/24/2016 209130	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.40) ; receive and review document requested for translation by B. Clark in preparation for Sawai deposition (1.20); search for duplicates and near duplicates (1.10); e-mail with B. Clark regarding same (0.40); e-mail Consortra	425.00	5.50	2,337.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	to request translation for Sawai deposition (0.40); e-mails with R. Noh regarding Sawai translation status (0.40); e-mail status of Sawai translations to Sawai deposition team (0.40); e-mails with J. Moy regarding documents clawed back by Panasonic (0.40); receive email by B. Clark regarding document to be requested for translation (0.40); e-mail with A. Gooding regarding same (0.40).				
2/25/2016 209044	Anna Gooding WORK Update master translation tracking list with foreign docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
2/25/2016 209133	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.40); e-mails with V. Glaze to discuss basic guidelines for proofreading to be provided to reviewers (0.80); e-mails with A. Gooding regarding exhibits entered with briefs (0.40).	425.00	1.60	680.00	Billable
2/26/2016 209047	Anna Gooding WORK Update master translation tracking list with foreign docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
2/26/2016 209081	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.20); update master translation tracking list with recent translations (0.80); format excel translations per the request of S. Kim-Helms (1.30).	155.00	3.40	527.00	Billable
2/26/2016 209136	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.40); e-mails with R. Noh and A. Gooding regarding status of outstanding certified translations (0.20); update translation tracking chart (0.40); e-mails with A. Gooding regarding translations entered with briefs (0.40); e-mails with J. Moy and L. Chan regarding documents clawed back by Panasonic (0.40); follow up email with A. Gooding regarding same (0.40).	425.00	2.20	935.00	Billable
2/28/2016 209139	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.40); e-mails with R. Noh and A. Gooding regarding status of outstanding certified translations (0.40); update translation tracking chart (0.40); e-mails with DPPs regarding Japanese interpreter (0.40); teleconference with N. Cihlar regarding same (0.50); receive and review documents requested for translation by A. Kikuchi in preparation for Sawai deposition (1.20); check translation status and search for duplicates and near duplicates (0.40); e-mail said translation request to Consortra (0.40).	425.00	4.10	1,742.50	Billable
2/29/2016 209049	Anna Gooding WORK Update master translation tracking list with foreign docket exhibits (2.00); email correspondence with translation company regarding revisions to translations (0.50); review translations for accuracy per request of S. Kim-Helms (1.50).	155.00	4.00	620.00	Billable
2/29/2016 209083	Richard Noh WORK Review certified translations for formatting accuracy (1.10); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.70).	155.00	2.00	310.00	Billable
3/1/2016 209439	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (0.80); e-mails with R. Noh and A. Gooding regarding status of outstanding certified translations (0.40); update translation tracking chart (0.40); e-mails with R. Noh regarding formatting certified translations (0.40); e-mails with B. Clark regarding status of outstanding translations requested for Sawai deposition (0.40); e-mail DPPs and IPPs Sawai deposition teams status of translations requested for Sawai deposition (0.40).	425.00	2.80	1,190.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/1/2016 209520	Anna Gooding WORK Update master translation tracking list with recently filed foreign docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
3/1/2016 209631	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.10); update master translation tracking list with recent translations (0.70); update master exhibit list (0.90).	155.00	2.90	449.50	Billable
3/2/2016 209442	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (1.20); e-mails with R. Noh and A. Gooding regarding status of outstanding certified translations (0.40); update translation tracking chart (0.50); receive and review document requested for Sawai deposition by J. Moy (1.20); instruction to A. Gooding to send out translation request (0.40).	425.00	3.70	1,572.50	Billable
3/2/2016 209632	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.50); update master translation tracking list with recent translations (0.50).	155.00	2.30	356.50	Billable
3/3/2016 209445	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai deposition (1.20); e-mails with R. Noh and A. Gooding regarding status of outstanding certified translations (0.70); update translation tracking chart (0.80).	425.00	2.70	1,147.50	Billable
3/3/2016 209633	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.50); update master translation tracking list with recent translations (0.20); update master exhibit list (0.10).	155.00	0.90	139.50	Billable
3/4/2016 209448	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai and Shimizu depositions (0.40); receive translation requests from J. Moy for Shimizu deposition (0.40); review documents requested for translation (1.00); search for duplicates and near duplicates in database (0.40); e-mails with J. Moy regarding said translation requests (0.40); receive translation requests from V. Glaze for documents cited in Class Cert Brief (0.40); review documents requested for translation (0.40); search for duplicates and near duplicates in database (0.40); e-mails with V. Glaze regarding said translation requests (0.40).	425.00	4.20	1,785.00	Billable
3/7/2016 209451	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested in preparation for Sawai and Shimizu depositions (0.70); search for native file of document requested for translation for Shimizu deposition (2.50).	425.00	3.20	1,360.00	Billable
3/8/2016 209454	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in class cert brief and Shimizu deposition (0.40); update translation tracking chart (0.40); e-mails with C. Lovell regarding translation searching in Catalyst (0.20); receive translation requests by V. Glaze for documents cited in Expert Report in Class Cert Brief (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with V. Glaze regarding said requests, time frame, and whether to translate in entirety (0.20); proofread SDI translations requested for documents cited in Class cert brief (0.40); receive translation requests by C. Hammarskjold in preparation for Sawai deposition (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with C. Hammarskjold regarding said request (0.20); send translation requests to Consortra (0.20).	425.00	4.40	1,870.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/8/2016 209529	Anna Gooding WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
3/9/2016 209457	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in class cert brief and Shimizu deposition (1.20); update translation tracking chart (0.60); proofread SDI translations requested for documents cited in Class cert brief (0.40); e-mails with R. Noh and A. Gooding to coordinate draft translations with DPPs and IPPs reviewers for proofreading (0.40); proofread LGC translation requested for documents cited in Class Cert Brief (1.50).	425.00	4.10	1,742.50	Billable
3/9/2016 209635	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.60).	155.00	3.00	465.00	Billable
3/10/2016 209461	Shinae Kim-Helms WORK E-mails with DPPs regarding documents clawed back by Panasonic (0.40); follow-up emails with R. Noh and A. Gooding regarding same (0.20); proofread SDI and LGC translations requested for documents cited in Class cert brief (0.40); receive translation requests by S. Scarlett in preparation for JJ Joe deposition (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with S. Scarlett regarding said requests and time frame (0.40); e-mails with R. Noh regarding translation status (0.20);e-mail to Consortra to request said certified translations (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in class cert brief and Shimizu deposition (0.40); update translation tracking chart (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in class cert brief and Shimizu deposition (0.40); update translation tracking chart (0.40).	425.00	4.80	2,040.00	Billable
3/10/2016 209532	Anna Gooding WORK Compile list of all clawed back translations and correspond with translation company regarding newly clawed back documents per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
3/10/2016 209636	Richard Noh WORK Prepare foreign documents for translation (1.30); update translation status per the request of S. Kim-Helms (0.50); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.40); format excel translations per the request of S. Kim-Helms (0.70).	155.00	3.00	465.00	Billable
3/11/2016 209464	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in class cert brief and Shimizu deposition (0.40); update translation tracking chart (0.40); e-mails with A. Gooding regarding documents and translations clawed back by Sanyo (0.20); e-mails with S. Scarlett regarding various searches to be done for translations prepared for certain witnesses (0.40); conduct searches in database for said purposes (0.40); receive translation requests by J. Moy in preparation for DS Lee deposition (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with J. Moy regarding said requests and time frame (0.40); e-mails with R. Noh regarding said translation requests (0.40).	425.00	3.80	1,615.00	Billable
3/11/2016 209608	Carla Voigt WORK Review emails from N. Cihlar regarding class certification translations (0.50); conferences with paralegal staff regarding collecting translations used as IPP class certification exhibits (0.10); review folder containing same and route to N. Cihlar (0.10); draft email with summary of issues related to the translations to send to S. Scarlett (0.40); route to S. Kim-Helms (0.20).	300.00	1.30	390.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/11/2016 209637	Richard Noh WORK Prepare foreign documents for translation (2.00); update translation status per the request of S. Kim-Helms (0.80); email correspondence with translation company regarding the same (0.20); email correspondence with translation company and V. Glaze regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.90).	155.00	4.00	620.00	Billable
3/11/2016 215401	Anna Gooding WORK Update master translation tracking list with new translations (0.50); prepare and send foreign documents for translation per request of S. Kim-Helms (1.00).	155.00	1.50	232.50	Billable
3/14/2016 209468	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive translation requests by V. Glaze in preparation for Sawai deposition (0.40); review said documents (0.80); search for duplicates and near duplicates in database (0.40); e-mails with V. Glaze regarding said requests and time frame (0.40); e-mails with A. Gooding regarding said translation requests (0.40).	425.00	3.20	1,360.00	Billable
3/14/2016 209638	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.30).	155.00	0.50	77.50	Billable
3/15/2016 209492	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.90); update translation tracking chart (0.60); e-mails with R. Noh and A. Gooding regarding exhibit chart (0.30); circulate same to S. Scarlett and C. Lovell (0.20).	425.00	2.00	850.00	Billable
3/15/2016 209540	Anna Gooding WORK Prepare foreign documents for translation and check for duplicates (1.00); update master translation tracking list with recent translations and foreign docket exhibits per request of S. Kim-Helms (1.00).	155.00	2.00	310.00	Billable
3/15/2016 209639	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.40); update master translation tracking list with recent translations (0.50); update master exhibit list per the request of S. Kim-Helms (0.60).	155.00	1.50	232.50	Billable
3/16/2016 209495	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50); e-mails with R. Noh and A. Gooding regarding status of outstanding translations (0.50).	425.00	1.50	637.50	Billable
3/16/2016 209640	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.00); update master translation tracking list with recent translations (1.00); format excel translations per the request of S. Kim-Helms (2.00); update translation status per the request of S. Kim-Helms (0.80).	155.00	5.90	914.50	Billable
3/17/2016 209498	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50); proofread LGC translations requested for JJ Joe depositions (0.50); receive translation requests by D. Lambrinos in preparation for Shimizu deposition (0.50); review said documents (0.90); search for duplicates and near duplicates in database (0.50); e-mails with D. Lambrinos regarding said requests and time frame (0.40); e-mails with A. Gooding and R.	425.00	4.20	1,785.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Noh regarding said translation requests (0.40).				
3/17/2016 209641	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (0.60).	155.00	1.80	279.00	Billable
3/18/2016 209501	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.30); update translation tracking chart (0.30); proofread LGC translations requested for JJ Joe depositions (0.20); receive translation requests by J. Moy in preparation for DS Lee deposition (0.20); review said documents (0.20); search for duplicates and near duplicates in database (0.20); e-mails with R. Noh regarding same (0.20); e-mails with J. Moy regarding said requests and time frame (0.20); e-mails with A. Gooding and R. Noh regarding said translation requests (0.20); receive translation requests by D. Lambrinos in preparation for Shimizu deposition (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.40); e-mails with D. Lambrinos regarding said requests and time frame (0.40).	425.00	4.00	1,700.00	Billable
3/18/2016 209545	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.30); coding newly certified translations on Catalyst per request of S. Kim-Helms (1.00).	155.00	2.90	449.50	Billable
3/18/2016 209642	Richard Noh WORK Prepare translations for recertification (1.30); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.50).	155.00	2.00	310.00	Billable
3/21/2016 209504	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.20); proofread LGC translations requested for JJ Joe depositions (0.20); e-mails with A. Kikkuchi regarding status of translation to be revised (0.20); review correspondence by Panasonic/Sanyo regarding clawed back documents (0.40); e-mails with J. Moy and D. Lambrinos regarding same (0.20); e-mails with A. Gooding and R. Noh regarding same (0.40); receive translation requests by J. Moy in preparation for Shimizu deposition (0.40); review said documents (0.40); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.40); e-mails with D J. Moy regarding said requests and time frame (0.40); e-mails with A. Gooding and R. Noh regarding said translation requests (0.40).	425.00	4.20	1,785.00	Billable
3/21/2016 209643	Richard Noh WORK Assist S. Kim-Helms with correcting deposition exhibits (1.00); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.40).	155.00	1.50	232.50	Billable
3/22/2016 209507	Shinae Kim-Helms WORK E-mails with D. Lambrinos and J. Moy regarding cost of translation of clawed back documents (0.40); e-mails with R. Noh and A. Gooding regarding bates numbers of said clawed back documents (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.60); proofread LGC translations requested for JJ Joe depositions (0.40); receive translation requests from J. Moy in preparation for Sawai deposition (0.40); e-mails with R. Noh regarding same (0.40).	425.00	3.80	1,615.00	Billable
3/22/2016 209548	Anna Gooding WORK Correspondence with translation company regarding new clawed back document request by defendants (1.50); update master translation tracking list with recent translations (2.00); email	155.00	4.00	620.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.50).				
3/22/2016 209644	Richard Noh WORK Review recertified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.10); review certified translations for formatting accuracy (0.40); format excel translations per the request of S. Kim-Helms (0.70); update master translation tracking list with recent translations (0.20).	155.00	2.90	449.50	Billable
3/23/2016 209510	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.30); update translation tracking chart (0.40); receive translation requests from L. Chan in preparation for Nakae deposition (0.40); review documents requested for translation (0.40); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.20); check status of translations requested for JJ Joe deposition with R. Noh (0.40); circulate JJ Joe certified translations to JJ Joe deposition team (0.20); teleconference with A. Gooding regarding translation status of clawed back documents (0.20).	425.00	2.90	1,232.50	Billable
3/23/2016 209551	Anna Gooding WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy per request of S. Kim-Helms (0.70).	155.00	1.00	155.00	Billable
3/23/2016 209645	Richard Noh WORK Prepare foreign documents for translation (2.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.10); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.50); update translation status per the request of S. Kim-Helms (0.50).	155.00	4.80	744.00	Billable
3/24/2016 209513	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.00); update translation tracking chart (0.70); proofread Korean to English translation requested for Shimizu deposition (0.70); request from D. Lambrinos regarding translation cost (0.40); e-mails with Consortra regarding same (0.40).	425.00	3.20	1,360.00	Billable
3/24/2016 209554	Anna Gooding WORK Email correspondence with translation company regarding revisions to translation (0.30); review formatting accuracy of revised translations per request of S. Kim-Helms (0.70).	155.00	1.00	155.00	Billable
3/25/2016 209516	Shinae Kim-Helms WORK Translate meta data in Japanese to English per D. Lambrinos (0.40); run searches in database for file path names (0.40); summarize search results and email said summary to D. Lambrinos (0.40); e-mails with D. Lambrinos and S. Nagano regarding software programs used by Panasonic (0.40); receive translation requests from J. Moy and V. Glaze in preparation for DS Lee and Shimizu depositions (0.30); review documents requested for translation (1.20); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.40); send translation request to Consortra (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40).	425.00	5.10	2,167.50	Billable
3/25/2016 209557	Anna Gooding WORK Email correspondence with translation company regarding revisions to translation (0.30); review formatting accuracy of revised translations per request of S. Kim-Helms (0.70).	155.00	1.00	155.00	Billable
3/28/2016 209518	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding	425.00	2.10	892.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive translation requests from J. Moy and V. Glaze in preparation for DS Lee and Shimizu depositions (0.40); review documents requested for translation (0.30); search for duplicates and near duplicates in database (0.20); e-mails with R. Noh regarding same (0.20); send translation request to Consortra (0.20).				
3/28/2016 209560	Anna Gooding WORK Email correspondence with translation company regarding revisions to translation (0.50); review formatting accuracy of revised translations per request of S. Kim-Helms (1.50).	155.00	2.00	310.00	Billable
3/28/2016 209647	Richard Noh WORK Prepare translations for recertification (1.00); draft email correspondence to translation company regarding the same (0.30); prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.70).	155.00	3.00	465.00	Billable
3/29/2016 209564	Anna Gooding WORK Email correspondence with translation company regarding revisions to translation (0.50); review formatting accuracy of revised translations per request of S. Kim-Helms (1.50).	155.00	2.00	310.00	Billable
3/29/2016 209648	Richard Noh WORK Format excel translations per the request of S. Kim-Helms.	155.00	1.00	155.00	Billable
3/29/2016 209660	Shinae Kim-Helms WORK Teleconference with R. Noh regarding status of outstanding translations (0.30); e-mails with J. Moy regarding Shimizu deposition schedules (0.30); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.20).	425.00	1.00	425.00	Billable
3/30/2016 209566	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.80); coding newly certified translations on Catalyst per request of S. Kim-Helms (1.20).	155.00	2.80	434.00	Billable
3/30/2016 209649	Richard Noh WORK Format excel translations per the request of S. Kim-Helms.	155.00	2.00	310.00	Billable
3/30/2016 209663	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.50); e-mails with V. Glaze regarding status of translations requested for Sawai deposition (0.50); e-mails with S. Nagano, A. Kikuchi and J. Moy regarding additional portions to be translated in translation requested for Sawai deposition (0.50).	425.00	2.10	892.50	Billable
3/31/2016 209568	Anna Gooding WORK Email correspondence with translation company regarding revisions to translation (0.50); review formatting accuracy of revised translations per request of S. Kim-Helms (1.50).	155.00	2.00	310.00	Billable
3/31/2016 209650	Richard Noh WORK Prepare foreign documents for translation (1.50); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations and recertified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (1.00); update translation status per the request of S. Kim-Helms (1.00).	155.00	4.90	759.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
3/31/2016 209665	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.40); e-mails with S. Nagano, J. Moy and A. Kikuchi regarding additional pages to be translated for Sawai deposition (0.20); e-mails with A. Gooding regarding competing translations for overlapping portion (0.20); e-mail to Consortra regarding same (0.20); receive request by L. Chan for copies of finalized translations for Sawai deposition (0.40); e-mails with R. Noh regarding same (0.30); receive translation requests from J. Moy and V. Glaze in preparation for DS Lee and Shimizu depositions (0.40); review documents requested for translation (0.40); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.40); teleconference with N. Cihlar regarding status of translation requests (0.40); search for JJ Joe related documents in database per S. Scarlett (0.40); review and code relevant/hot documents (0.40); provide S. Scarlett with summaries of relevant documents (0.40).	425.00	5.10	2,167.50	Billable
4/1/2016 210010	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with V. Glaze regarding status of certified translation requested for Sawai deposition (0.40); receive translation requests from V. Glaze and D. Lambrinos in preparation for DS Lee and Shimizu depositions (0.40); review documents requested for translation (0.70); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh regarding same (0.40).	425.00	3.10	1,317.50	Billable
4/1/2016 210142	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.10); update master translation tracking list with recent translations (0.20).	155.00	1.40	217.00	Billable
4/4/2016 210012	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.40); receive translation requests from D. Lambrinos and H. Rim in preparation for Shimizu and Nakae depositions (0.40); review documents requested for translation (1.20); search for duplicates and near duplicates in database (0.40); e-mails to R. Noh and A. Gooding re: request to be sent out (0.40); e-mails with V. Glaze regarding status of certified translations requested for Sawai deposition (0.60).	425.00	4.20	1,785.00	Billable
4/4/2016 210097	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10); code newly certified translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	1.90	294.50	Billable
4/5/2016 210063	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.40); receive translation requests from M. Caylao and D. Lambrinos in preparation for Shimizu depositions (0.40); review documents requested for translation (1.20); search for duplicates and near duplicates in database (0.40); e-mails to R. Noh and A. Gooding re: request to be sent out (0.40); e-mails with J. Anderson regarding certified translations finalized for Sawai deposition (0.40).	425.00	4.00	1,700.00	Billable
4/5/2016 210101	Anna Gooding WORK Review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.30); finalize certified translations (0.10); code newly certified translations on Catalyst (0.10); update master tracking chart per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/5/2016 210143	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.90); update master translation tracking list with recent translations (0.70).	155.00	1.80	279.00	Billable
4/6/2016 210064	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); proofread SDI translation requested in preparation for DS Lee deposition (0.40); proofread SDI translation requested in preparation for DS Lee deposition (0.40); review [redacted] (1.00); e-mails with S. Scarlett regarding same (0.20); email to R. Noh with instruction to send translation request (0.20); receive translation request from H. Rim in preparation for Nakae deposition (0.20); review said document (0.40); search for duplicates and near duplicates with translation available (0.40); e-mails with R. Noh approving said translation request (0.20).	425.00	4.20	1,785.00	Billable
4/6/2016 210105	Anna Gooding WORK Prepare foreign documents for translation (1.50); update master translation tracking list with recent translations per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable
4/6/2016 210144	Richard Noh WORK Review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.40).	155.00	1.50	232.50	Billable
4/7/2016 210065	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.50); receive translation request from V. Glaze in preparation for Shimizu deposition (0.40); review said document (0.40); search for duplicates and near duplicates with translation available (0.40); e-mails with R. Noh approving said translation request (0.40).	425.00	3.30	1,402.50	Billable
4/7/2016 210145	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.30); update master translation tracking list with recent translations (0.30).	155.00	1.80	279.00	Billable
4/8/2016 210067	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.10); update translation tracking chart (0.10); receive translation request from Nakae deposition (0.10); review said documents (0.20); search for duplicates and near duplicates with translation available (0.10); e-mails with R. Noh and A. Gooding approving said translation request (0.10).	425.00	0.70	297.50	Billable
4/8/2016 210108	Anna Gooding WORK Review certified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.30).	155.00	2.00	310.00	Billable
4/8/2016 210146	Richard Noh WORK Review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.20).	155.00	1.00	155.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/9/2016 210068	Shinae Kim-Helms WORK E-mails with Consortra regarding rush translation requested in preparation for DS Lee (0.50); proofread SDI document (1.00).	425.00	1.50	637.50	Billable
4/11/2016 210069	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); teleconference with A. Gooding regarding translation status (0.40); run searches for document with missing attachments in preparation for JJ Joe deposition per R. Scarlett (1.20); e-mails with S. Scarlett regarding same (0.40); e-mails with L. Chan and A. Gooding regarding clawed back documents (0.40).	425.00	3.20	1,360.00	Billable
4/11/2016 210112	Anna Gooding WORK Review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding revisions to translations (0.30); update master tracking list with recent translations and docket exhibits per request of S. Kim-Helms (1.30).	155.00	2.00	310.00	Billable
4/12/2016 210071	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50).	425.00	1.00	425.00	Billable
4/12/2016 210114	Anna Gooding WORK Review certified translations for formatting accuracy (0.30); finalize translations per request of S. Kim-Helms (0.20).	155.00	0.50	77.50	Billable
4/13/2016 210072	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.40); e-mails with S. Nagano regarding DS Lees name in Korean (0.40); proofread SDI draft translation in preparation for IS Jeon deposition (1.20).	425.00	2.80	1,190.00	Billable
4/13/2016 210147	Richard Noh WORK Email correspondence with S. Nagano and V. Glaze regarding revisions to translations.	155.00	0.50	77.50	Billable
4/14/2016 210073	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40).	425.00	0.80	340.00	Billable
4/14/2016 210149	Richard Noh WORK Review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30).	155.00	1.00	155.00	Billable
4/15/2016 210074	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.10); update translation tracking chart (0.10); receive translation request from H. Rim in preparation for Nakae deposition (0.10); review document (0.30); search for duplicates and near duplicates (0.30); email to R. Noh and A. Gooding approving said translation request (0.10).	425.00	1.00	425.00	Billable
4/18/2016 210076	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive translation requests from H. Rim, S. Scarlett, L.	425.00	2.80	1,190.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Chan and V. Glaze in preparation for various upcoming depositions (0.40); briefly review documents (0.40); check duplicates and near duplicates in database with available translation (0.40); e-mails with A. Gooding and R. Noh authorizing said translation requests (0.40); e-mails with A. Gooding regarding status of outstanding translations to be proofed (0.40).				
4/18/2016 210119	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy per request of S. Kim-Helms (0.30).	155.00	2.00	310.00	Billable
4/18/2016 210150	Richard Noh WORK Prepare foreign documents for translation (1.60); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20).	155.00	2.00	310.00	Billable
4/19/2016 210077	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.60); e-mails with A. Gooding regarding status of certified translations requested for Shimizu deposition (0.40); e-mails with DPPs and S. Nagano regarding status of revisions to draft translations (0.40); receive translation request from H. Rim and D. Lambrinos in preparation for Nakae and Shimizu depositions (0.50); review said documents (0.50); search for duplicates and near duplicates in database (0.50); e-mails to A. Gooding and R. Noh authorizing said non-rush translation request (0.40).	425.00	3.70	1,572.50	Billable
4/19/2016 210121	Anna Gooding WORK Review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding revisions to translations (0.20); update master tracking list per request of S. Kim-Helms (0.50).	155.00	1.00	155.00	Billable
4/19/2016 210151	Richard Noh WORK Prepare foreign documents for translation (3.00); email correspondence with translation company regarding the same (0.50); format excel translations per the request of S. Kim-Helms (3.00).	155.00	6.50	1,007.50	Billable
4/20/2016 210078	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.30); receive translation request from H. Rim in preparation for Nakae deposition (0.40); review said documents (1.20); search for duplicates and near duplicates in database (0.40); e-mails to A. Gooding and R. Noh authorizing said non-rush translation request (0.40).	425.00	3.10	1,317.50	Billable
4/20/2016 210124	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10); coding newly certified translations on Catalyst per request of S. Kim-Helms (0.30).	155.00	2.00	310.00	Billable
4/20/2016 210152	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding revisions to translations (0.10); format excel translations per the request of S. Kim-Helms (1.50); update master translation tracking list with recent translations (0.30).	155.00	3.90	604.50	Billable
4/21/2016 210079	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); e-mails with A. Gooding regarding status of certified	425.00	3.80	1,615.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translations requested for Shimizu deposition (0.40); e-mail said status to D. Lambrinos and Shimizu deposition team (0.40); e-mails with C. Lovell regarding LGC document to be translated for experts (0.40); review said document (1.20); search for duplicates and near duplicates in database (0.40).				
4/21/2016 210126	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.30); finalize translations; coding newly certified translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
4/22/2016 210080	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.70); update translation tracking chart (0.70); e-mails with S. Nagano and T. Lee regarding status of proofreading draft translations to be finalized for Shimizu deposition (0.80); e-mails with R. Noh regarding status of certified translations requested for Shimizu deposition (0.80); e-mails with V. Glaze and A. Gooding regarding status of revisions prepared by DPPs (0.50).	425.00	3.50	1,487.50	Billable
4/22/2016 210130	Anna Gooding WORK Review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding revisions to translations (0.60); update master tracking list per request of S. Kim-Helms (0.40).	155.00	2.00	310.00	Billable
4/22/2016 210153	Richard Noh WORK Format excel translations per the request of S. Kim-Helms (1.50); format foreign originals to match translations per the request of S. Kim-Helms (1.30); review certified translations for formatting accuracy (0.90); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.70).	155.00	4.50	697.50	Billable
4/25/2016 210082	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.50); update translation tracking chart (2.20); e-mails with S. Nagano regarding status of draft translations to be proofread (0.80); e-mails with M. Kuzma and A. Gooding regarding changes to be made to translation tracking chart (0.80); e-mails with A. Gooding regarding status of translations requested for Shimizu deposition (0.50).	425.00	5.80	2,465.00	Billable
4/25/2016 210133	Anna Gooding WORK Review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding revisions to translations (0.20); update master tracking list with recent translations and docket exhibits per request of S. Kim-Helms (0.30).	155.00	1.00	155.00	Billable
4/25/2016 210154	Richard Noh WORK Format excel and powerpoint translations per the request of S. Kim-Helms (2.00); format foreign originals to match translations per the request of S. Kim-Helms (1.90); email correspondence with translation company regarding revisions to translations (0.10).	155.00	4.00	620.00	Billable
4/26/2016 210083	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.40); teleconference with A. Gooding and R. Noh regarding status of translations requested for Shimizu deposition (0.50); e-mails with Transperfect regarding same (0.40); e-mails with D. Lambrinos regarding status of Shimizu translations (0.40); e-mails with R. Noh regarding same (0.40); proofread draft translations of SDI documents requested for IS Jeon deposition (2.20).	425.00	5.50	2,337.50	Billable
4/26/2016 210135	Anna Gooding WORK Format foreign original excels into PDF format for recently finalized translations (5.00); finalizing	155.00	7.00	1,085.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translations (1.00); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding revisions to translations (0.10); update master tracking list with recent translations per request of S. Kim-Helms (0.60).				
4/26/2016 210155	Richard Noh WORK Format excel and powerpoint translations per the request of S. Kim-Helms (3.50); format foreign originals to match translations per the request of S. Kim-Helms (3.40); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.60).	155.00	8.80	1,364.00	Billable
4/27/2016 210085	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); e-mails with S. Nagano regarding last minute Panasonic production to be used for Shimizu exhibits (0.40); receive and review document requested for translation by H. Rim for Nakae deposition (1.20); search database for duplicates and near duplicates (0.40); email to R. Noh/A. Gooding authorizing said translation request (0.40); e-mail with A. Gooding and review teams regarding status of outstanding revisions (0.40).	425.00	3.80	1,615.00	Billable
4/27/2016 210137	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations and docket exhibits (1.00); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.20); finalize translations (0.30); coding newly certified translations on Catalyst per request of S. Kim-Helms (0.10).	155.00	3.00	465.00	Billable
4/27/2016 210156	Richard Noh WORK Format excel and powerpoint translations per the request of S. Kim-Helms (2.50); format foreign originals to match translations per the request of S. Kim-Helms (2.50).	155.00	5.00	775.00	Billable
4/28/2016 210086	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with H. Rim regarding [redacted] production (0.40); receive urgent translation request from D. Lambrinos for Shimizu deposition (0.40); review requested document (0.70); search for duplicates and near duplicates (0.40); request certified translation of said document to Consortra (0.40); e-mails with T. Lee regarding availability to proofread (0.40).	425.00	3.50	1,487.50	Billable
4/28/2016 210157	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (1.80); update master translation tracking list with recent translations (0.60).	155.00	2.80	434.00	Billable
4/29/2016 210090	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.00); update translation tracking chart (0.40); e-mails with S. Scarlett regarding status of IS Jeon translations (0.40); e-mails with A. Gooding regarding same (0.40).	425.00	2.20	935.00	Billable
4/29/2016 210141	Anna Gooding WORK Review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding revisions to translations (0.20); update master tracking list with recent translations and docket exhibits per request of S. Kim-Helms (2.00).	155.00	3.00	465.00	Billable
4/29/2016 210158	Richard Noh WORK Review recertified translation to ensure all changes were implemented per the request of S. Kim-Helms (2.00); format excel translations per the request of S. Kim-Helms (2.00); update master translation tracking list with recent translations (0.50).	155.00	4.50	697.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/2/2016 210092	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.30).	425.00	0.50	212.50	Billable
5/3/2016 210636	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.50); finalize translations (0.40); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
5/3/2016 210675	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.60).	425.00	1.20	510.00	Billable
5/4/2016 210639	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00).	155.00	1.70	263.50	Billable
5/4/2016 210678	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with S. Nagano regarding search methods for business card documents in database (0.20); e-mails with M. Caylao regarding printing options in Catalyst (0.30); search database for business card documents produced by various Defendants perD. Lambrinos (0.40); e-mails with D. Lambrinos and S. Nagano regarding same (0.40); receive translation request from S. Nagano and D. Lambrinos (0.40); review requested documents (0.40); search database for duplicates and near duplicates (0.40); email to R. Noh and A. Gooding to oversee said translation request (0.20).	425.00	3.50	1,487.50	Billable
5/4/2016 210726	Richard Noh WORK Prepare foreign documents for translation (1.40); email correspondence with translation company regarding the same (0.10); check defendant re-certified translations to ensure all changes have been made correctly (1.00); update master translation tracking list with recent translations (0.50).	155.00	3.00	465.00	Billable
5/5/2016 210642	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.60); finalize translations and code recently finalized translations on Catalyst per request of S. Kim-Helms (0.30).	155.00	2.00	310.00	Billable
5/5/2016 210680	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive and review documents requested for translation by H. Rim in preparation for Nakae deposition (0.40); review said documents (1.00); search for duplicates and near duplicates (0.40); e-mail to R. Noh authorizing said translation request (0.40).	425.00	3.00	1,275.00	Billable
5/5/2016 210727	Richard Noh WORK Review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.20).	155.00	1.00	155.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/6/2016	Shinae Kim-Helms	425.00	1.50	637.50	Billable
210683	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.30); receive and review documents requested for translation by H. Rim in preparation for Nakae deposition (0.30); review said documents (0.30); search for duplicates and near duplicates (0.30); e-mail to R. Noh authorizing said translation request (0.10).				
5/6/2016	Richard Noh	155.00	2.00	310.00	Billable
210728	WORK				
	Prepare foreign documents for translation (1.30); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.50).				
5/9/2016	Shinae Kim-Helms	425.00	1.60	680.00	Billable
210686	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.70); e-mails with S. Scarlett regarding exhibit marked in Sawai deposition (0.10).				
5/9/2016	Richard Noh	155.00	1.50	232.50	Billable
210729	WORK				
	Review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.50).				
5/10/2016	Anna Gooding	155.00	0.80	124.00	Billable
210646	WORK				
	Prepare foreign documents for translation (0.20); update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20).				
5/10/2016	Shinae Kim-Helms	425.00	1.00	425.00	Billable
210689	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50).				
5/11/2016	Anna Gooding	155.00	0.90	139.50	Billable
210650	WORK				
	Prepare foreign documents for translation (0.30); update master translation tracking list with recent translations (0.20); review certified translations for formatting accuracy (0.20); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.20).				
5/11/2016	Shinae Kim-Helms	425.00	4.10	1,742.50	Billable
210692	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive and review documents requested by DPPs for JW Huh depositions (0.40); e-mails with A. Gooding and R. Noh regarding status of said translations (0.40); search for duplicates and near duplicates with available certified translations (0.40); e-mail to R. Noh authorizing said translation request (0.40); receive and review documents requested by H. Rim for Nakae depositions (0.90); search for duplicates and near duplicates with available certified translations (0.40); e-mail to R. Noh authorizing said translation request (0.40).				
5/12/2016	Shinae Kim-Helms	425.00	4.20	1,785.00	Billable
210695	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.60); receive and review documents requested by DPP counsel and H. Rim for Nakae depositions (1.20); e-mails with R. Noh regarding status of said translations (0.40); search for duplicates and near duplicates with available certified translations (0.60); e-mail to R. Noh authorizing said translation request (0.40); e-mails with H. Rim regarding transliterations of Japanese names (0.40).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/12/2016	Richard Noh	155.00	2.50	387.50	Billable
210731	WORK				
	Prepare foreign documents for translation (1.50); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30); update translation status per the request of S. Kim-Helms (0.50).				
5/13/2016	Anna Gooding	155.00	0.70	108.50	Billable
210653	WORK				
	Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20).				
5/13/2016	Shinae Kim-Helms	425.00	2.80	1,190.00	Billable
210698	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50); teleconference with R. Noh to discuss proposed changes to previously marked exhibits (0.50); review chart and said reformatted exhibits on server (0.40); e-mails with R. Noh regarding same (0.40); e-mail to DPP and EPP counsel to circulate chart listing proposed changes to said exhibits (0.50).				
5/13/2016	Richard Noh	155.00	1.00	155.00	Billable
210732	WORK				
	Email correspondence with translation company regarding revisions to translations (0.50); update master translation tracking list with recent translations (0.50).				
5/16/2016	Anna Gooding	155.00	0.80	124.00	Billable
210656	WORK				
	Update master translation tracking list with recent translations and docket exhibits (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20).				
5/16/2016	Shinae Kim-Helms	425.00	1.00	425.00	Billable
210701	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40).				
5/16/2016	Richard Noh	155.00	2.80	434.00	Billable
210733	WORK				
	Prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.30); review certified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (0.50).				
5/17/2016	Anna Gooding	155.00	0.90	139.50	Billable
210658	WORK				
	Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.40).				
5/17/2016	Shinae Kim-Helms	425.00	2.80	1,190.00	Billable
210704	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.40); e-mails with S. Nagano regarding Nakae deposition schedules (0.40); e-mails with A. Gooding regarding status of deposition exhibits entered past month (0.40); e-mails with V. Glaze regarding newly produced SDI documents (0.40).				
5/18/2016	Anna Gooding	155.00	0.80	124.00	Billable
210660	WORK				
	Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20).				
5/18/2016	Shinae Kim-Helms	425.00	4.70	1,997.50	Billable
210707	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); proofread LGC translations requested for JW Huh deposition (0.40); receive and review translation requests from V. Glaze for foreign language documents entered in Shimizu depositions (1.20); teleconference with V. Glaze regarding same (0.50); e-mail to A. Gooding authorizing said translation request (0.20); review documents entered without translation in Shimizu deposition per V. Glaze (1.20); e-mails with V. Glaze and R. Noh regarding said translation status (0.40).				
5/18/2016 210734	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.90); update master translation tracking list with recent translations (1.50); update deposition exhibit list per the request of S. Kim-Helms (2.10).	155.00	4.50	697.50	Billable
5/19/2016 210662	Anna Gooding WORK Update master translation tracking list with recent translations (1.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); finalize translations (0.20); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.10).	155.00	1.90	294.50	Billable
5/19/2016 210710	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with S. Nagano and R. Noh regarding Shimizu exhibits and certified translations thereof (0.40); proofread revisions to LGC draft translations requested for JW Huh deposition (1.20); receive and review documents requested for rush translation by S. Scarlett (1.20); search for duplicates and near duplicates in database (0.40); e- mail to A. Gooding and R. Noh authorizing rush translation request (0.40); proofread Korean portion in translations of Sanyo documents requested for translation (0.40).	425.00	4.80	2,040.00	Billable
5/20/2016 210663	Anna Gooding WORK Prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20); email correspondence with translation company regarding the same (0.10); finalize translations (0.10); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.10).	155.00	2.00	310.00	Billable
5/20/2016 210712	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); e-mails with A. Gooding regarding rush translation requested for JJ Joe (0.40); review exhibit chart shared by DPP counsel (1.20); e-mails with R. Noh regarding same (0.40); review master deposition exhibit chart prepared by R. Noh and circulate same to S. Scarlett and C. Lovell (1.20).	425.00	4.20	1,785.00	Billable
5/20/2016 210735	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (1.50); email correspondence regarding access to deposition exhibits (0.40); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.60); update master translation tracking list with recent translations (1.00).	155.00	4.50	697.50	Billable
5/23/2016 210664	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.80).	155.00	1.90	294.50	Billable
5/23/2016 210713	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.40); proofread revisions to LGC draft translations requested for	425.00	9.10	3,867.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	JJ Joe deposition (1.20); receive and review documents requested for translation by D. Lambrinos for [redacted] (1.20); search for duplicates and check translation status (0.40); e-mails with D. Lambrinos regarding same (0.40); e-mail to A. Gooding and R. Noh authorizing said translation requests (0.40); receive and review documents requested for translation by H. Rim for Nakae depositions (0.70); search for duplicates and check translation status (0.70); e-mails with H. Rim regarding same (0.40); e-mail to A. Gooding and R. Noh authorizing said translation requests (0.40); receive and review documents requested for translation by V. Glaze for JW Huh depositions and brief (0.40); search for duplicates and check translation status (0.70); e-mails with V. Glaze regarding same (0.40); e-mail to A. Gooding and R. Noh authorizing said translation requests (0.40); teleconference with L. Chan regarding translation status of apology letter documents relating to Tachihara (0.50).				
5/23/2016 210736	Richard Noh WORK Update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (3.00); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.60).	155.00	4.80	744.00	Billable
5/24/2016 210665	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50).	155.00	1.70	263.50	Billable
5/24/2016 210716	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh regarding outstanding translations requested for documents cited in various upcoming depositions (1.00); update translation tracking chart (0.40); proofread translation of Korean portion in Panasonic translation drafted by Consortra (1.20); e-mails with H. Rim regarding proposed correction to existing certified translation (0.40); e-mail to R. Noh authorizing said corrections (0.40); e-mails with R. Noh regarding rush translation for Shimizu deposition and status of JJ Jeong certified translations (0.40).	425.00	3.80	1,615.00	Billable
5/24/2016 210737	Richard Noh WORK Update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.40); update master translation tracking list with recent translations (0.50); update deposition exhibit list per the request of S. Kim-Helms (0.40).	155.00	5.80	899.00	Billable
5/25/2016 210719	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50).	425.00	1.00	425.00	Billable
5/25/2016 210738	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.20); prepare translation for re-certification (1.00); reformat deposition exhibit per the request of S. Kim-Helms (2.70); update deposition exhibit list per the request of S. Kim-Helms (1.00).	155.00	5.70	883.50	Billable
5/26/2016 210721	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh regarding outstanding translations requested for documents cited in various upcoming depositions (0.30); update translation tracking chart (0.30); e-mails with R. Noh regarding exhibits entered in Shimizu and Sawai depositions (0.30); review e-mail correspondences between R. Noh and V. Glaze regarding same (0.30); review revised deposition exhibit chart (0.30); circulate same to S. Scarlett and C. Lovell (0.30).	425.00	1.80	765.00	Billable
5/26/2016 210739	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms.	155.00	3.00	465.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/27/2016 210723	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.60); e-mails with L. Chan and H. Rim regarding Nakaes letters (0.40); e-mails with M. Caylao regarding review of Japanese documents (0.40); receive and review documents requested for translation by J. Moy for Nakae deposition(1.20); e-mail with R. Noh regarding same (0.40); search database for duplicates and near duplicates with translation available (0.40).	425.00	3.80	1,615.00	Billable
5/27/2016 210740	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (1.10).	155.00	3.40	527.00	Billable
5/31/2016 210741	Richard Noh WORK Assist S. Kim-Helms with deposition related matters.	155.00	1.00	155.00	Billable
6/1/2016 210955	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.20); update translation tracking chart (0.40); receive translation request from H. Rim in preparation for Nakae deposition (0.20); search database for near duplicates and duplicates (0.40); review said documents (0.40); e-mails with H. Rim regarding same (0.20).	425.00	1.80	765.00	Billable
6/1/2016 211037	Richard Noh WORK Review certified and recertified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.70).	155.00	3.00	465.00	Billable
6/2/2016 210958	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.40); receive and review requests by H. Rim and L. Chan to correct typos in existing translations (0.40); send said request to Consortra (0.40); proofread initial draft translations of LGC documents (1.20).	425.00	3.20	1,360.00	Billable
6/3/2016 210961	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.40); receive and review documents requested by V. Glaze for translation in preparation for JW Huh deposition (1.20); search for duplicates and near duplicates in database (0.40); email to R. Noh authorizing said request (0.40); continue to proofread initial draft translations of LGC documents (1.20).	425.00	4.80	2,040.00	Billable
6/3/2016 211039	Richard Noh WORK Prepare foreign documents for translation (1.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (2.00); update master translation tracking list with recent translations (0.50).	155.00	3.90	604.50	Billable
6/6/2016 210964	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive and review documents requested by J. Moy for translation (0.40); check translation status of check documents (0.80); e-mails with J. Moy regarding same (0.40); continue to proofread initial draft translations of LGC documents (0.40).	425.00	2.80	1,190.00	Billable
6/6/2016 211040	Richard Noh WORK Review certified translations for formatting accuracy (1.40); email correspondence with translation company and V. Glaze regarding revisions to translations (0.20); format powerpoint translation per	155.00	4.00	620.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	the request of S. Kim-Helms (2.00); update master translation tracking list with recent translations (0.40).				
6/7/2016 210968	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.60); receive and review documents requested for translation by V. Glaze in preparation for JW Huh and YA Oh depositions (1.20); search database for duplicates and near duplicates (0.60); e-mails with V. Glaze regarding near duplicate document of said document requested for translation (0.40); e-mail non-rush translation request to Consortra (0.40).	425.00	3.80	1,615.00	Billable
6/7/2016 211041	Richard Noh WORK Review certified translations for formatting accuracy (2.50); email correspondence with translation company regarding revisions to translations (0.20); update translation status per the request of S. Kim-Helms (0.30); prepare foreign documents for translation (1.00); update master translation tracking list with recent translations (0.80).	155.00	4.80	744.00	Billable
6/8/2016 210971	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.50); e-mails with R. Noh regarding DAPs translations to be uploaded (0.40); receive and review documents requested for translation by H. Rim (1.00); search database for duplicates and near duplicates (0.40); e-mail to A. Gooding authorizing said translation request (0.40); provide H. Rim with status of outstanding translations requested for Nakae deposition (0.40).	425.00	3.50	1,487.50	Billable
6/9/2016 210974	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.70); proofread Korean to English translations drafted by Consortra (1.20).	425.00	2.50	1,062.50	Billable
6/10/2016 210938	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (2.50); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.50); finalize translations (0.20); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	3.80	589.00	Billable
6/10/2016 210977	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.20); update translation tracking chart (0.40); receive and review documents requested for translation by H. Rim (0.40); search database for duplicates and near duplicates (0.40); e-mail to A. Gooding authorizing said translation request (0.40); e-mails with V. Glaze regarding status of outstanding translations requested for JW Huh and YA Ahn depositions (0.40); proofread LGC and SDI translations requested for JW Huh and YA Ahn depositions (2.50); e-mails with A. Gooding regarding operative versions of translations (0.40).	425.00	6.10	2,592.50	Billable
6/13/2016 210940	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.80); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
6/13/2016 210979	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.70); e-mails with T. Lee to assign initial draft translations to proofread (0.60); e-mails with H. Rim and L. Chan regarding correction to be made to existing translation to be used in Nakae deposition (0.60); e-mail to A. Gooding authorizing said correction	425.00	4.80	2,040.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	request (0.40); e-mails with V. Glaze regarding Korean to English draft translations to proofread (0.50); proofread SDI and LGC translations to be entered at YA Oh and JW Huh depositions (1.20).				
6/13/2016 211043	Richard Noh WORK Assist S. Kim-Helms with coding recent translations on Catalyst.	155.00	1.00	155.00	Billable
6/14/2016 210943	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); finalize translations (0.20); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.10).	155.00	0.90	139.50	Billable
6/14/2016 210984	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.70); e-mails with H. Rim regarding status of outstanding translations for Nakae depositions (0.40); review document requested by D. Lambrinos for experts report (0.40); e-mails with D. Lambrinos and J. Zahid to discuss importance of document (0.40); prepare informal translation of said document (1.20); e-mails with A. Gooding regarding duplicate revisions prepared by DPPs and IPPs (0.40).	425.00	4.10	1,742.50	Billable
6/14/2016 211044	Richard Noh WORK Review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.40).	155.00	2.00	310.00	Billable
6/15/2016 210945	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20).	155.00	1.60	248.00	Billable
6/15/2016 210987	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with R. Noh regarding status of outstanding translations requested for Nakae, JW Huh and YA Oh depositions (0.40); e-mails with R. Noh regarding deposition exhibit chart to be updated and JJ Joe exhibits (0.40); receive rush translation request from V. Glaze (0.40); e-mails with R. Noh regarding same (0.40); e-mails with R. Noh regarding deposition exhibit chart (0.40).	425.00	2.80	1,190.00	Billable
6/15/2016 211045	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (0.20); prepare foreign documents for translation (0.40); email correspondence with translation company regarding the same (0.10); email correspondence with translation company regarding revisions to translations (0.10); format excel translation per the request of S. Kim-Helms (0.50); review certified translations for formatting accuracy (0.40); update master translation tracking list with recent translations (0.20).	155.00	1.90	294.50	Billable
6/16/2016 210946	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.00); prepare documents for translation (0.40); email correspondence with translation company regarding revisions to translations (0.10); correspondence with DPP counsel regarding revisions per request of S. Kim-Helms (0.20).	155.00	1.70	263.50	Billable
6/16/2016 210989	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with D. Lambrinos regarding availability of Japanese language reviewers (0.40); e-mails with A. Gooding regarding status of outstanding translations	425.00	6.80	2,890.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	requested for YA Oh and JW Huh (0.40); receive and review document requested by D. Lambrinos for translation in preparation for experts report (0.80); review documents requested for translation in preparation for Masunaga deposition by B. Miller (1.20); e-mails with B. Miller regarding same (0.40); search for duplicates and near duplicates in database (0.40); e-mail to Consortra requesting said translations (0.20); proofread draft translation of LGC document requested for JW Hh (1.80); e-mails with S. Scarlett regarding potential YA Oh exhibits (0.20); email to Consortra requesting correction to be made to errors in existing translations (0.20).				
6/17/2016 210992	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with T. Lee regarding availability to proofread draft translations (0.30); review draft translations prepared by Consortra (1.10); forward same to T. Lee (0.30); e-mails with C. Lovell regarding foreign language exhibits and translations thereof entered in April and May (0.40); teleconference with R. Noh regarding status of deposition exhibit chart (0.40); emails with B. Miller regarding deposition schedule of Masunaga (0.30); review Notice of deposition of Masunaga (0.40); proofread draft translation of LGC translation requested as rush (0.50); e-mails with C. Lovell regarding status of outstanding translation requested for YA Oh (0.40); review DPPs revision to draft translation (1.10); e-mails with V. Glaze regarding same (0.40); emails with A. Gooding regarding exhibits to briefs filed in May and June for purpose of updating translation tracking chart (0.40); e-mails with B. Miller regarding status of translations requested for Masunaga depositions (0.40); e-mails with V. Glaze regarding status of translations requested for JW Huh depositions (0.40); receive and review documents requested for translation by D. Lambrinos for depositions of experts (0.90); teleconference with D. Lambrinos regarding same (0.40); review said documents and select portions to be translated (0.20); e-mail to Consortra requesting certified translations of said documents (0.20).	425.00	9.30	3,952.50	Billable
6/17/2016 211046	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (1.00); update master translation tracking list with recent deposition exhibits (1.00); assist S. Kim-Helms with coding recent translations on Catalyst (1.50); update translation status per the request of S. Kim-Helms (0.50).	155.00	4.00	620.00	Billable
6/18/2016 210993	Shinae Kim-Helms WORK E-mails with L. Chan regarding errors found in translations to be entered in Nakae depositions (0.70); e-mail to Consortra requesting said corrections (0.80); e-mails with V. Glaze, T. Lee and S. Nagano regarding said errors (0.50); e-mails with B. Miller regarding status of translations requested for Masunaga depositions (0.80); teleconference with B. Miller regarding same (0.70).	425.00	3.50	1,487.50	Billable
6/20/2016 210948	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding the same (0.10); format excel translations into PDF form (1.80); finalize translations (0.20); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.10).	155.00	3.00	465.00	Billable
6/20/2016 210994	Shinae Kim-Helms WORK E-mails with M. Smith regarding status of translations requested for Masunaga depositions (0.70); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.70); update translation tracking chart (1.10).	425.00	2.50	1,062.50	Billable
6/20/2016 211047	Richard Noh WORK Review certified translations for formatting accuracy (1.10); email correspondence with translation company regarding the same (0.40); format foreign originals to match translations per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (0.50).	155.00	3.00	465.00	Billable
6/21/2016 210998	Shinae Kim-Helms WORK E-mails with S. Nagano regarding corrections to be made to existing translations (0.40); receive and review rush translation request for YA Oh deposition by V. Glaze (0.40); e-mails with V. Glaze and C. Smith regarding same (0.40); search for duplicates and near duplicates in database (1.00); e-mail	425.00	3.60	1,530.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	to R. Noh authorizing said rush request (0.20); review and reformat LGC document to be used as exhibit per J. Lim and V. Glaze (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40).				
6/21/2016 211048	Richard Noh WORK Prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.10); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); format excel translation per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (0.80).	155.00	5.00	775.00	Billable
6/22/2016 210950	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
6/22/2016 211000	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with A. Gooding regarding translations that are entered as exhibits to briefs (0.40); proofread draft translation of LGC document (1.20); e-mails with R. Noh regarding format of said draft translation (0.40); e-mails with B. Miller regarding JJ Jeon exhibits (0.40); review documents requested for certified translations by B. Miller in preparation for YA Oh depositions (1.20); e-mails with B. Miller and S. Scarlett regarding same (0.40); prepare informal translations of documents to be entered in YA Oh depositions (2.30).	425.00	7.10	3,017.50	Billable
6/22/2016 211049	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); format excel translation per the request of S. Kim-Helms (1.80); update master translation tracking list with recent translations (0.70).	155.00	3.80	589.00	Billable
6/23/2016 211002	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); continue to prepare informal translations of documents to be entered in YA Oh depositions (1.20); e-mails with Consortra regarding ASAP translation requests (0.40); teleconference with Consortra regarding same (0.50); proofread revisions to informal translations redlined by Consortra (2.80); prepare second revisions (2.30); e-mails with Consortra regarding translation guidelines set forth in translation protocol (0.40).	425.00	8.40	3,570.00	Billable
6/23/2016 211050	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (1.00); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.90).	155.00	3.00	465.00	Billable
6/24/2016 211005	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); proofread informal translation of SDI document prepared by Consortra (1.20); e-mails with R. Noh regarding adoption of redlined revision by Consortra (0.40); e-mails with Consortra regarding same (0.40); prepare clean versions of second revision to Consortras redlined revisions (0.40); review finalized translations requested for YA Oh depositions (0.90); circulate finalized versions of certified translations to S. Scarlet and B. Miller (0.40); review e-mails between D. Lambrinos, T. Lee, and K. Quackenbush regarding ascertainability review project (0.40).	425.00	4.90	2,082.50	Billable
6/24/2016 211051	Richard Noh WORK Prepare foreign documents for translation (2.50); email correspondence with translation company regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.40); update master	155.00	5.20	806.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	translation tracking list with recent translations (0.70).				
6/27/2016 211008	Shinae Kim-Helms WORK E-mails with V. Glaze regarding draft translations to proofread (0.20); review emails between S. Nagano and D. Lambrinos regarding ascertainability review (0.30); review SDI documents missing attachments (0.20); search database for said attachments per D. Lambrinos (0.30).	425.00	1.00	425.00	Billable
6/27/2016 211052	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); update master translation tracking list with recent translations (0.60).	155.00	1.80	279.00	Billable
6/28/2016 210953	Anna Gooding WORK Check translation status (0.20); prepare documents for translation (0.20); email translation company regarding the same (0.20); update master translation tracking list with recent translations per request of S. Kim-Helms (0.40).	155.00	1.00	155.00	Billable
6/28/2016 211011	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with V. Glaze and M. Hirai regarding draft translations to proofread (0.70); e-mails with R. Noh, A. Gooding and B. Miller regarding exhibits entered into record in May and June (0.40); receive and review document requested for translation by J. Moy (0.70); search for duplicates and near duplicates (0.40); e-mail to A. Gooding authorizing said request (0.40); e-mails with A. Gooding and R. Noh regarding updating translation tracking chart with translations entered into record (0.40).	425.00	3.80	1,615.00	Billable
6/28/2016 211053	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms.	155.00	3.00	465.00	Billable
6/29/2016 210954	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.80); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
6/29/2016 211014	Shinae Kim-Helms WORK E-mails with A. Gooding regarding translation tracking chart (0.40); review said tracking chart (0.80); e-mails with D. Lambrinos and S. Nagano regarding translation of investigation (0.40); e-mails with A. Gooding regarding translation exhibits to briefs and experts reports filed in May and June (0.40); review and revise information on translated exhibits in translation tracking chart (1.20); e-mails with A. Gooding and R. Noh regarding same (0.40).	425.00	3.60	1,530.00	Billable
6/30/2016 211017	Shinae Kim-Helms WORK E-mails with H. Rim regarding operative versions of translations (0.40); review and competing versions of translations per H. Rim (0.40); review document requested for informal translation by D. Lambrinos (0.90); e-mails with D. Lambrinos regarding same (0.40); e-mails with C. Nishimura regarding assignment to prepare informal translation (0.40); e-mails with R. Noh regarding updated translation tracking chart (0.40); circulate updated exhibit index and translation tracking chart to S. Scarlett and C. Lovell (0.40); e-mails with S. Scarlett regarding repository for operative versions of translations (0.40); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40).	425.00	4.50	1,912.50	Billable
6/30/2016 211054	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.60); format excel translation per the request of S. Kim-Helms (3.40); update master translation tracking list with deposition dates per the request of S. Kim-Helms (1.00).	155.00	5.00	775.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/1/2016 211020	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.60); proofread Korean to English draft translation prepared by Consortra (1.20).	425.00	2.40	1,020.00	Billable
7/1/2016 211791	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy per request of S. Kim-Helms (0.10).	155.00	0.50	77.50	Billable
7/1/2016 211812	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.50); update master translation tracking list with recent translations (0.50).	155.00	3.00	465.00	Billable
7/5/2016 211813	Richard Noh WORK Review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.30); format excel translation per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (0.60).	155.00	3.90	604.50	Billable
7/5/2016 211831	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.50); proofread draft translation of LGC document prepared by Consortra (2.00); review e-mail correspondences between S. Nagano, T. Lee and D. Lambrinos regarding ascertainability review (0.40).	425.00	3.50	1,487.50	Billable
7/6/2016 211792	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10); check translation status per request of S. Kim-Helms (0.10).	155.00	0.50	77.50	Billable
7/6/2016 211834	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.50); e-mails with V. Glaze to follow up with revisions to be prepared by DPPs review team (0.40); review e-mail correspondences between S. Nagano, T. Lee and D. Lambrinos regarding ascertainability review (0.40).	425.00	1.70	722.50	Billable
7/7/2016 211793	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.20).	155.00	0.50	77.50	Billable
7/7/2016 211814	Richard Noh WORK Review certified translations for formatting accuracy (1.50); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.40).	155.00	2.00	310.00	Billable
7/7/2016 211837	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.30); update translation tracking chart (0.20).	425.00	0.50	212.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/8/2016 211815	Richard Noh WORK Review certified translations for formatting accuracy (1.70); email correspondence with translation company regarding the same (0.40); update master translation tracking list with recent translations (0.90); update translation status per the request of S. Kim-Helms (0.50).	155.00	3.50	542.50	Billable
7/8/2016 211839	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); receive and review documents requested for translation by H. Rim in preparation for Shimokomaki depositions (1.20); search database for duplicates and near duplicates (0.40); e-mail Consortra requesting said certified translations (0.40); e-mails with R. Noh regarding translation status (0.40); receive and review document requested for certified translation by D. Lambrionos in preparation for Horn deposition (1.20); receive and review 20 documents requested for translation by D. Lambrinos [redacted] (1.20); e-mails with R. Noh to check said translation status (0.40); search database for duplicates and near duplicates (0.40); e-mails with D. Lambrinos and M. Caylao regarding same (0.40); e-mail to Consortra inquiring of estimates (0.40).	425.00	7.40	3,145.00	Billable
7/11/2016 211794	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim Helms.	155.00	0.50	77.50	Billable
7/11/2016 211816	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (1.00); update master deposition exhibit list (2.00).	155.00	3.00	465.00	Billable
7/11/2016 211840	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (0.50); e-mails with M. Caylao and D. Lambrinos regarding documents to be translated for Horn deposition (0.40); e-mails with D. Lambrinos and S. Nagano regarding 20 documents requested for Horn depositions (0.40); prepare informal translations of potential exhibits for Horn depositions (4.40).	425.00	6.20	2,635.00	Billable
7/12/2016 211796	Anna Gooding WORK Update master translation tracking list with recently filed docket exhibits per request of S. Kim Helms.	155.00	1.00	155.00	Billable
7/12/2016 211844	Shinae Kim-Helms WORK E-mails with D. Lambrinos and M. Caylao regarding informal translation to prepare and priority thereof (0.40); e-mail to S. Nagano, C. Nishimura and T. Lee to assign documents to translate (0.40); prepare full translation of LGC documents (3.20); review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40).	425.00	4.80	2,040.00	Billable
7/13/2016 211797	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.40); format foreign original excel documents to PDF form per request of S. Kim-Helms (1.20).	155.00	4.00	620.00	Billable
7/13/2016 211817	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.80); update deposition exhibit list (1.20).	155.00	2.00	310.00	Billable
7/13/2016 211845	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); review informal translations prepared by T. Lee and S.	425.00	6.80	2,890.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Nagano (1.20); revise and update same (1.20); circulate finalized translations to D. Lambrinos and M. Caylao (0.40); e-mails with R. Noh and A. Gooding regarding same (0.40); prepare informal translation of LGC documents (1.20); receive and review document requested for translation by H. Rim (0.40); search database for duplicates and near duplicates of requested document (0.40); e-mail to A. Gooding and R. Noh authorizing said translation request (0.40); e-mails with H. Rim regarding availability of certified translation (0.40).				
7/14/2016 211798	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.40); format foreign original excel documents to PDF form (1.00); finalize translations per request of S. Kim-Helms (0.20).	155.00	3.80	589.00	Billable
7/14/2016 211818	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (2.00); email correspondence with translation company regarding revisions to translations (0.30); update master translation tracking list with recent translations (0.70).	155.00	3.00	465.00	Billable
7/14/2016 211847	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); review informal translations prepared by T. Lee and S. Nagano (1.00); revise and update same (1.20); circulate finalized translations to D. Lambrinos and M. Caylao (0.40); e-mails with R. Noh and A. Gooding regarding same (0.40); prepare informal translation of SDI documents (1.20).	425.00	5.00	2,125.00	Billable
7/15/2016 211799	Anna Gooding WORK Update master translation tracking list with recently filed docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
7/15/2016 211819	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (1.00); update translation status per the request of S. Kim-Helms (1.00); email correspondence regarding informal translations (0.50); format informal translations per the request of S. Kim-Helms (1.50).	155.00	4.00	620.00	Billable
7/15/2016 211849	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); review informal translations prepared by T. Lee and S. Nagano (1.10); revise and update same (1.20); circulate finalized translations to D. Lambrinos and M. Caylao (0.20); e-mails with R. Noh and A. Gooding regarding same (0.40); prepare informal translation of SDI documents (1.20); e-mails with R. Noh and A. Gooding regarding exhibit index (0.20); e-mail to B. Miller requesting missing deposition materials (0.20).	425.00	5.30	2,252.50	Billable
7/18/2016 211801	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.00); finalize translations (0.50); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable
7/18/2016 211820	Richard Noh WORK Prepare translations for recertification (2.00); email correspondence with translation company regarding the same (0.20); format foreign originals to match translations per the request of S. Kim-Helms (0.80); update master translation tracking list with recent translations (0.50); update deposition exhibit list per the request of S. Kim-Helms (0.50).	155.00	4.00	620.00	Billable
7/18/2016 211851	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); review draft translations prepared by Consortra (0.80);	425.00	3.80	1,615.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	assign same to DPPs and S. Nagano (0.20); e-mail with M. Caylao regarding status of requested certified translation (0.40); e-mails with B. Miller regarding deposition materials not available in repository site (0.40); continue to prepare informal translation of SDI document (1.20).				
7/19/2016 211802	Anna Gooding WORK Organize internal server (0.20); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.80).	155.00	1.00	155.00	Billable
7/19/2016 211821	Richard Noh WORK Update deposition exhibit list per the request of S. Kim-Helms (2.00); update master translation tracking list with recent deposition exhibits (2.00).	155.00	4.00	620.00	Billable
7/19/2016 211853	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); review updated deposition exhibit chart prepared by R. Noh (0.40); circulate same to S. Scarlett and C. Lovell (0.40); receive and review documents requested for Horn deposition by M. Cayla (0.40); search for duplicates and near duplicates in database (0.40); e-mail to R. Noh and A. Gooding authorizing said request (0.40).	425.00	2.80	1,190.00	Billable
7/20/2016 211803	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (0.80); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
7/20/2016 211822	Richard Noh WORK Prepare foreign documents for translation (0.90); email correspondence with translation company regarding the same (0.10).	155.00	1.00	155.00	Billable
7/20/2016 211854	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.20); e-mails with M. Caylao and D. Lambrinos regarding urgent translation request for Horn deposition (0.40); teleconference with R. Noh and A. Gooding regarding same (0.20); e-mails with reviewers regarding same (0.30); receive and review documents requested for Horn deposition by M. Caylao (0.30); search for duplicates and near duplicates in database (0.30); e-mail to R. Noh and A. Gooding authorizing said request (0.40).	425.00	2.70	1,147.50	Billable
7/21/2016 211804	Anna Gooding WORK Update master translation tracking list with recent translations (1.80); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
7/21/2016 211823	Richard Noh WORK Review certified translations for formatting accuracy (2.20); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.60); email correspondence with reviewers regarding revisions to translations (0.40).	155.00	3.50	542.50	Billable
7/21/2016 211855	Shinae Kim-Helms WORK E-mails with T. Lee regarding revision format (0.20); emails with C. Nishimura regarding informal translation assignments (0.30).	425.00	0.50	212.50	Billable
7/22/2016 211824	Richard Noh WORK Review certified translations for formatting accuracy (0.80); several email exchanges with translation company regarding revisions to translations and formatting issues (0.50); update master translation tracking list with recent translations (0.70); format excel translations per the request of S. Kim-Helms (1.40); format foreign originals to match translations per the request of S. Kim-Helms (1.60).	155.00	5.00	775.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/22/2016 211856	Shinae Kim-Helms WORK E-mails with A. Gooding and R. Noh regarding status of rush certified translations requested for Horn depositions.	425.00	0.20	85.00	Billable
7/25/2016 211805	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation (0.60); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
7/25/2016 211825	Richard Noh WORK Review certified translations and recertified translations for formatting accuracy (2.60); multiple email exchanges with translation company regarding the same, including revisions to translations (0.70); update master translation tracking list with recent translations (0.70); email correspondence regarding informal translations (0.20); format informal translations per the request of S. Kim-Helms (2.80).	155.00	7.00	1,085.00	Billable
7/26/2016 211806	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation (0.60); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
7/26/2016 211826	Richard Noh WORK Review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.80).	155.00	3.00	465.00	Billable
7/26/2016 211857	Shinae Kim-Helms WORK Receive e-mail from H. Rim regarding request for certified translation in preparation for H. Shimokomaki (0.20); e-mails with A. Gooding and R. Noh regarding same (0.10).	425.00	0.30	127.50	Billable
7/27/2016 211807	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); prepare foreign documents for translation per request of S. Kim-Helms (0.50).	155.00	1.00	155.00	Billable
7/27/2016 211827	Richard Noh WORK Email correspondence regarding informal translations (0.30); format informal translations per the request of S. Kim-Helms (1.70).	155.00	2.00	310.00	Billable
7/27/2016 211859	Shinae Kim-Helms WORK E-mails with R. Noh and A. Gooding regarding status of informal translations (0.20); e-mails with C. Nishimura regarding same (0.10).	425.00	0.30	127.50	Billable
7/27/2016 211887	Carla Voigt WORK Email exchange with S. Nagano regarding informal translation request (0.50); confer with staff regarding available reviewers and status of current assignments (0.40); email informal translation assignments to C. Nishimura and T. Lee (0.50); confer with R. Noh and A. Gooding regarding checking for duplicates (0.10).	300.00	1.50	450.00	Billable
7/28/2016 211809	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); check for duplicates on recently requested translations per request of S. Kim-Helms (0.80).	155.00	1.00	155.00	Billable
7/28/2016 211828	Richard Noh WORK Review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding the same (0.30); prepare foreign documents for translation (1.20); multiple email	155.00	5.00	775.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	correspondences with translation company regarding the same (0.20); format informal translations per the request of S. Kim-Helms (1.30).				
7/28/2016 211860	Shinae Kim-Helms WORK E-mails with C. Voigt regarding status of translation assignments.	425.00	0.20	85.00	Billable
7/28/2016 211873	Carla Voigt WORK Email exchange with D. Lambrinos and T. Lee regarding deadlines for informal translation assignments (0.30); route certified translation request from M. Caylao to R. Noh and A. Gooding (0.20).	300.00	0.50	150.00	Billable
7/29/2016 211811	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); check for duplicates on recently requested translations (1.20); prepare foreign documents for translation per request of S. Kim-Helms (0.40).	155.00	2.00	310.00	Billable
7/29/2016 211829	Richard Noh WORK Review certified translations for formatting accuracy (1.60); email correspondence with translation company regarding the same (0.20); email correspondence with reviewers regarding informal translations (0.20).	155.00	2.00	310.00	Billable
7/29/2016 211861	Shinae Kim-Helms WORK Receive and review document requested for Terado deposition by H. Rim (0.10); e-mails with A. Gooding regarding said request (0.10); e-mails with H. Rim regarding same (0.10); e-mails with T. Lee regarding informal translation assignment (0.20).	425.00	0.50	212.50	Billable
7/29/2016 211874	Carla Voigt WORK Review emails from T. Lee (0.10); email exchange with R. Noh regarding assigning informal translation to new reviewer (0.10).	300.00	0.20	60.00	Billable
8/1/2016 211863	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with C. Nishimura regarding outstanding informal translation assignments requested [redacted] (0.40); e-mails with R. Noh regarding exhibits yet to be added to deposition exhibit chart (0.40); e-mails with B. Troxel regarding status of new Toshiba production (0.40); receive and review document requested for Terado deposition by V. Glaze (1.20); e-mails with V. Glaze regarding same (0.40); search database for duplicates and near duplicates (1.00); e-mail to R. Noh authorizing said translation request (0.20).	425.00	4.80	2,040.00	Billable
8/1/2016 212290	Richard Noh WORK Update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (2.00); email correspondence with translation company regarding the same (0.40); assist S. Kim-Helms with coding recent translations on Catalyst (2.00); update master translation tracking list with recent translations (0.30); update deposition exhibit list (0.30).	155.00	6.00	930.00	Billable
8/2/2016 212261	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
8/2/2016 212291	Richard Noh WORK Review informal translations for formatting accuracy (2.10); format excel translation per the request of S. Kim-Helms (2.30); update master translation tracking list with recent translations (0.60); update deposition exhibit list (0.60); prepare foreign documents for translation (0.70); several email correspondences with translation company regarding the same (0.70).	155.00	7.00	1,085.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/2/2016 212313	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (1.00); e-mails with R. Noh regarding informal translations ready to be circulated (0.40); receive and review request for informal translation of documents [redacted] by M. Caylao (1.20); search for duplicates and near duplicates (1.00); assign said translation to Japanese review team (0.40); receive and review request for certified translation of documents [redacted] by M. Caylao (1.00); e-mails with M. Caylao regarding same (0.40); search for duplicates and near duplicates (1.00); e-mail to R. Noh authorizing said translation request (0.40).	425.00	7.60	3,230.00	Billable
8/3/2016 212292	Richard Noh WORK Prepare foreign documents for translation (0.50); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30).	155.00	1.00	155.00	Billable
8/3/2016 212315	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.50); update translation tracking chart (1.00); e-mails with S. Nagano regarding availability (0.40); e-mails with R. Noh regarding length of document requested for certified translation [redacted] (0.40); e-mails with Consortra to propose new method charge translations (0.40); deliver said conversation with Consortra to D. Lambrinos and team (0.30); teleconference with N. Cihlar regarding same (0.50); receive and review alternative documents proposed by S. Nagano (1.00); e-mails with S. Nagano and R. Noh regarding same (0.40); teleconference with S. Nagano to discuss possible option for partial translation (0.50); review and analyze documents requested for translation by D. Lambrinos [redacted] (0.70); assess need for certified translation (0.50); e-mails with D. Lambrinos, S. Nagano, and R. Noh regarding same (0.40).	425.00	7.00	2,975.00	Billable
8/4/2016 212263	Anna Gooding WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations per request of S. Kim-Helms (0.30).	155.00	1.00	155.00	Billable
8/4/2016 212293	Richard Noh WORK Review informal translations for formatting accuracy (1.00); format excel translation per the request of S. Kim-Helms (1.00); multiple email correspondences regarding the same (0.50); prepare foreign documents for translation (0.70); update master translation tracking list with recent translations (0.80).	155.00	4.00	620.00	Billable
8/4/2016 212317	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); e-mails with Consortra to obtain quotes for requested translations (0.40); e-mails with D. Lambrinos regarding same (0.40); receive and review requests for certified translation by D. Lambrinos [redacted] (0.80); search duplicates and near duplicates (0.40); oversee said request to R. Noh and A. Gooding (0.20); e-mails with S. Nagano regarding documents to be informally translated and sent for certified translation (0.40); review said documents (0.40).	425.00	4.00	1,700.00	Billable
8/5/2016 212265	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy per request of S. Kim-Helms (0.60).	155.00	1.00	155.00	Billable
8/5/2016 212294	Richard Noh WORK Prepare foreign documents for translation (0.90); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.50).	155.00	1.50	232.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/5/2016	Shinae Kim-Helms	425.00	3.80	1,615.00	Billable
212319	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); e-mails with B. Troxel and V. Glaze regarding missing Toshiba production (0.40); e-mails with D. Lambrinos and S. Nagano regarding documents to be translated [redacted] (0.40); review said documents (1.00); search for duplicates and near duplicates in database (0.40); e-mails with R. Noh and A. Gooding regarding said documents (0.40); e-mails with T. Lee, S. Nagano and C. Nishimura regarding informal translation assignments and oversee select documents for certified translation (0.40).				
8/8/2016	Richard Noh	155.00	3.50	542.50	Billable
212295	WORK				
	Email correspondence with translation company regarding revisions to translations (0.20); review informal translations for formatting accuracy (2.60); email correspondence regarding the same (0.20); update translation status per the request of S. Kim-Helms (0.50).				
8/8/2016	Shinae Kim-Helms	425.00	3.80	1,615.00	Billable
212321	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.00); update translation tracking chart (0.40); e-mails with R. Noh and A. Gooding regarding draft translations to assign (0.40); e-mails with B. Troxel and V. Glaze regarding missing Toshiba production (0.40); review documents requested for informal and certified translation by D. Lambrinos [redacted] (1.20); e-mails with D. Lambrinos and S. Nagano regarding same (0.40).				
8/9/2016	Anna Gooding	155.00	3.00	465.00	Billable
212268	WORK				
	Update master translation tracking list with recent translations (0.20); various email correspondences with translation company regarding revisions to translations and proofreading (1.00); review certified translations for formatting accuracy (0.80); finalize translations per request of S. Kim-Helms (1.00).				
8/9/2016	Richard Noh	155.00	6.70	1,038.50	Billable
212296	WORK				
	Email correspondence with translation company regarding revisions to translations (0.50); update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (2.60); review certified translations for formatting accuracy (2.20); email correspondence with translation company regarding the same (0.40).				
8/9/2016	Shinae Kim-Helms	425.00	6.20	2,635.00	Billable
212323	WORK				
	Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.40); proofread draft translations of LGC documents requested in preparation for SW Lee depositions (1.20); e-mails with D. Lambrinos regarding Japanese language reviewers (0.40); e-mails with S. Nagano and D. Lambrinos regarding [redacted] (0.40); review said documents (0.40); review documents requested by D. Lambrinos for informal and certified translation [redacted] (1.20); search for duplicates and near duplicates with translation available (1.00); e-mails with D. Lambrinos and S. Nagano regarding same (0.40); oversee selected documents for certified translation (0.20).				
8/10/2016	Anna Gooding	155.00	5.00	775.00	Billable
212289	WORK				
	Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (1.00); check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).				
8/10/2016	Richard Noh	155.00	3.00	465.00	Billable
212297	WORK				
	Assist S. Kim-Helms with coding recent translations on Catalyst (1.00); review informal translations for formatting accuracy (0.80); multiple email correspondences regarding formatting issues and revisions to translations (0.30); format excel translation per the request of S. Kim-Helms (0.90).				

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/10/2016 212325	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.60); update translation tracking chart (0.60); e-mails with S. Nagano regarding availability (0.40); review documents requested by D. Lambrinos for informal and certified translation in preparation for [redacted] (1.20); search for duplicates and near duplicates with translation available (0.40); e-mails with D. Lambrinos and S. Nagano regarding same (0.40); oversee selected documents for informal translations (0.20); e-mails with R. Noh regarding status of translation field coding (0.40); receive and review documents requested by S. Scarlett in preparation for depositions of Albert Kim (1.20); search for duplicates and near duplicates in database (0.40); e-mails with S. Scarlett recommending only selective translations (0.40); e-mail to Consortra non-rush translation request (0.40).	425.00	6.60	2,805.00	Billable
8/11/2016 212270	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (3.00); prepare foreign documents for translation (1.00); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.20); finalize informal translations per request of S. Kim-Helms (0.20).	155.00	5.00	775.00	Billable
8/11/2016 212298	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (2.00); review certified translations for formatting accuracy (1.20); prepare foreign documents for translation (1.30); multiple email correspondences with translation company regarding revisions (0.50).	155.00	5.00	775.00	Billable
8/11/2016 212327	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); provide missing translation of Sanyo document (0.40); receive and review document requested by H. Rim in preparation for SW Lee depositions (1.00); search for duplicates and near duplicates in database (0.40); e-mails with H. Rim regarding same (0.40); email to A. Gooding and R. Noh authorizing said translation request (0.10); receive and review document requested by D. Lambrinos [redacted] (0.40); search for duplicates and near duplicates in database (0.40); e-mails with D. Lambrinos regarding same (0.40); email to A. Gooding and R. Noh authorizing said translation request (0.40).	425.00	4.70	1,997.50	Billable
8/12/2016 212272	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (2.00); prepare foreign documents for translation (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.30); email correspondence with translation company regarding the same (0.20); finalize informal translations per request of S. Kim-Helms (0.30).	155.00	4.00	620.00	Billable
8/12/2016 212299	Richard Noh WORK Prepare foreign documents for translation; email correspondence with translation company regarding the same (2.00); review certified translations for formatting accuracy (1.00); format excel translation per the request of S. Kim-Helms (1.00).	155.00	4.00	620.00	Billable
8/12/2016 212328	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.40); update translation tracking chart (0.40); receive and review document requested by D. Lambrinos [redacted] (1.20); search for duplicates and near duplicates in database (1.00); e-mails with D. Lambrinos regarding same (0.40); email to A. Gooding and R. Noh authorizing said translation request (0.20); e-mail to Consortra rush translation requests (0.40); e-mails with D. Lambrinos and J. Verducci regarding availability of Japanese language review team (0.40); prepare informal translations of LGC document per request by D. Lambrinos (2.50).	425.00	6.90	2,932.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/15/2016 212273	Anna Gooding WORK Update master translation tracking list with recently filed docket exhibits per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
8/15/2016 212300	Richard Noh WORK Review certified translations for formatting accuracy (1.00); format excel translation per the request of S. Kim-Helms (1.00); update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (0.80); email correspondence with translation company regarding the same (0.20).	155.00	4.00	620.00	Billable
8/15/2016 212330	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (1.00); update translation tracking chart (1.00); teleconference with Y. Shima regarding translation-related assignments (0.50); follow up with Y. Shima on emails regarding related issues (0.40); e-mails with J. Decenda regarding deposition exhibit list (0.40); review documents requested for certified translation by D. Lambrinos [redacted] (1.20); search for near duplicates and duplicates (1.20); e-mails with D. Lambrinos regarding same (0.40); e-mail to R. Noh and A. Gooding authorizing said translation request (0.40).	425.00	6.50	2,762.50	Billable
8/16/2016 212275	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.00); email correspondence with translation company regarding revisions to translations (0.60); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.60).	155.00	3.00	465.00	Billable
8/16/2016 212301	Richard Noh WORK Review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding revisions to translations (0.50).	155.00	1.50	232.50	Billable
8/16/2016 212333	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for [redacted] and various upcoming depositions (2.00); update translation tracking chart (0.20); review Y. Shimas revisions to draft translations and informal translations (0.30); receive and review documents requested for informal translations and certified translations by D. Lambrinos [redacted] (1.40); search database for duplicates and near duplicates (0.30); e-mails with R. Noh and A. Gooding regarding translation status of same (0.10); assign requested informal translation to Japanese language review team (0.20); e-mails with Japanese language review team regarding same (0.10); e-mail translation request to Consortra (0.10); proofread LGC draft translations prepared by Consortra (1.10).	425.00	5.80	2,465.00	Billable
8/17/2016 212277	Anna Gooding WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.80).	155.00	1.90	294.50	Billable
8/17/2016 212302	Richard Noh WORK Review certified translations for formatting accuracy (1.30); email correspondence with translation company regarding revisions to translations (0.20).	155.00	1.50	232.50	Billable
8/17/2016 212336	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested for documents cited in various upcoming depositions (0.80); update translation tracking chart (0.40); receive and review documents requested for informal translations and certified translations by D. Lambrinos [redacted] (0.40); search database for duplicates and near duplicates (0.40); e-mails with R. Noh and A. Gooding regarding translation status of same (0.40); assign requested informal translation to Japanese language review team (0.40); e-mails with Japanese language review team regarding same (0.40); review informal translations prepared by Japanese review team (1.20); e-mail to A. Gooding and R. Noh for circulation of same (1.20); e-mails with D. Lambrinos regarding availability of Japanese language	425.00	7.20	3,060.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	reviewers for informal translations to be prepared [redacted] (0.40); proofread draft translations of LGC documents prepared by translation company (1.20).				
8/18/2016 212278	Anna Gooding WORK Update master tracking list with recent translations (1.10); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (2.00).	155.00	3.50	542.50	Billable
8/18/2016 212303	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (1.40); update translation status per the request of S. Kim-Helms; update deposition exhibit list (0.60).	155.00	2.00	310.00	Billable
8/18/2016 212339	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested [redacted] and various upcoming depositions (0.40); update translation tracking chart (1.00); receive and review documents requested for informal translations and certified translations by D. Lambrinos in preparation [redacted] (1.20); search database for duplicates and near duplicates (1.00); e-mails with R. Noh and A. Gooding regarding translation status of same (0.40); assign requested informal translation to Japanese language review team (0.20); e-mails with Japanese language review team regarding same (0.40); review informal translations prepared by Japanese review team (0.40); circulate same to D. Lambrinos and M. Caylao (0.40); prepare list of certified translations and informal translations requested [redacted] since July per M. Caylao (0.40); prepare informal translation of SDI document per N. Ajujas request (0.40); e-mails with Japanese language review team on DPP side for proofreading draft translations (0.40); e-mails with Japanese review team on IPP side regarding same (0.40); prepare informal translation of LGC documents per D. Lambrinos in preparation [redacted] (1.80).	425.00	8.80	3,740.00	Billable
8/19/2016 212304	Richard Noh WORK Update translation status per the request of S. Kim-Helms (1.00); email correspondence with translation company regarding revisions to translations (0.40); format excel translation per the request of S. Kim-Helms (2.60); review certified translations for formatting accuracy (1.00).	155.00	5.00	775.00	Billable
8/19/2016 212340	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested [redacted] and various upcoming depositions (0.40); update translation tracking chart (0.40); receive and review documents requested for informal translations by D. Lambrinos [redacted] (0.40); search database for duplicates and near duplicates (0.40);e-mails with R. Noh and A. Gooding regarding translation status of same (0.40); assign requested informal translation to Japanese language review team (0.20); e-mails with Japanese language review team regarding same (0.20); review informal translations prepared by Japanese review team (0.20); circulate same to D. Lambrinos and M. Caylao (0.20); prepare list of certified translations and informal translations requested for [redacted] since July per M. Caylao (0.70); prepare informal translation of SDI document per N. Ajujas request (1.20); e-mails with Japanese language review team on DPP side for proofreading draft translations (0.20); e-mails with Japanese review team on IPP side regarding same (0.20); prepare informal translation of LGC documents per D. Lambrinos in preparation for [redacted] (0.20); proofread draft translations of LGC and SDI documents requested for upcoming depositions (0.20).	425.00	5.50	2,337.50	Billable
8/20/2016 212341	Shinae Kim-Helms WORK Circulate informal translations prepared by Japanese review team (0.20); e-mails with D. Lambrinos regarding partial translation (0.20).	425.00	0.40	170.00	Billable
8/22/2016 212279	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (3.00); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20); finalize informal translations per request of S. Kim-Helms (0.50).	155.00	5.00	775.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/22/2016 212305	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.70); update master translation tracking list with recent translations (1.60); format excel translations per the request of S. Kim-Helms (2.80); update translation status per the request of S. Kim-Helms (0.90).	155.00	7.30	1,131.50	Billable
8/22/2016 212343	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested [redacted] and various upcoming depositions (0.40); update translation tracking chart (0.40); assign informal translation requested [redacted] to Japanese language review team (0.20); e-mails with Japanese language review team regarding same (0.20); review informal translations prepared by Japanese review team (0.40); circulate same to D. Lambrinos and M. Caylao (0.20); prepare informal translation of LGC document per D. Lambrinos in [redacted] (1.20);e-mails with Japanese review team regarding preparation of informal translations (1.20); locate informal translations requested by M. Caylao (0.40); e-mails with status of certified translations requested for Reply Brief with M. Caylao (0.40); prepare informal translation of LGC document requested by D. Lambrinos [redacted] (2.00).	425.00	7.00	2,975.00	Billable
8/23/2016 212280	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
8/23/2016 212306	Richard Noh WORK Update master translation tracking list with recent translations.	155.00	1.50	232.50	Billable
8/23/2016 212345	Shinae Kim-Helms WORK Review email correspondences between Consortra and R. Noh and A. Gooding regarding outstanding translations requested [redacted] and various upcoming depositions (0.40); update translation tracking chart (0.40); review Y. Shimas revisions to draft translations and informal translations (0.90); receive and review informal translations requested by D. Lambrinos in preparation [redacted] (0.40); search database for duplicates and near duplicates (0.40); e-mails with Japanese language review team regarding status of informal translations (0.40); circulate finalized informal translations to D. Lambrinos and M. Caylao (0.40); review updated deposition exhibit index prepared by R. Noh and A. Gooding (0.40); circulate same to C. Lovell, S. Scarlett, and J. Decenda (0.40); e-mails with B. Miller and M. Caylao regarding copies of foreign originals to be submitted as exhibits (0.40); teleconference with A. Gooding regarding same (0.50).	425.00	5.00	2,125.00	Billable
8/24/2016 212282	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation per request of S. Kim-Helms (0.80).	155.00	1.00	155.00	Billable
8/24/2016 212348	Shinae Kim-Helms WORK E-mails with H. Rim regarding operative version of translations (0.60); receive and review document requested for certified translation by V. Glaze in preparation for SW Lee deposition (1.00); search for duplicates and near duplicates in database (0.60); e-mail to A. Gooding and R. Noh authorizing said request (0.60).	425.00	2.80	1,190.00	Billable
8/25/2016 212351	Shinae Kim-Helms WORK E-mails with H. Rim regarding operative versions of translations and status thereof.	425.00	0.30	127.50	Billable
8/30/2016 212357	Shinae Kim-Helms WORK Receive and review request for nonrush certified translation from H. Rim in preparation for Shimokomaki deposition (0.40); search for duplicates and near duplicates in database (0.40); e-mail to A. Gooding and R. Noh authorizing said request (0.40); e-mails with H. Rim regarding same (0.30).	425.00	1.50	637.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/31/2016 212287	Anna Gooding WORK Various email correspondences with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy (1.00).	155.00	2.00	310.00	Billable
8/31/2016 212360	Shinae Kim-Helms WORK Proofread draft translation of SDI document requested in preparation for SW Lee depositions (0.70); prepare revision to same (0.40); review documents requested for certified translation by S. Scarlett in preparation for Albert Kim depositions (0.40); search for duplicates and near duplicates (0.40); select documents ready for certified translation (0.40); e-mail to A. Gooding and R. Noh overseeing said request (0.20); e-mail to S. Scarlett summarizing search results (0.40).	425.00	2.90	1,232.50	Billable
9/1/2016 212582	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (0.50); check for duplicates (0.50); multiple email communications with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.50).	155.00	3.00	465.00	Billable
9/1/2016 212669	Richard Noh WORK Review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding the same (0.10).	155.00	0.50	77.50	Billable
9/2/2016 212602	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding number of certified translations finalized to date (0.40); teleconference with R. Noh regarding same (0.50); prepare chart accordingly (1.20); review and revise translation tracking chart (1.20); e-mails with D. Lambrinos regarding number of foreign language documents produced (0.40); conduct searches for foreign language documents in database (0.50).	425.00	4.20	1,785.00	Billable
9/2/2016 212670	Richard Noh WORK Prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.80).	155.00	2.00	310.00	Billable
9/6/2016 212583	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.20).	155.00	0.50	77.50	Billable
9/6/2016 212606	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.50); e-mails with R. Noh and A. Gooding to coordinate assigning draft translations to be proofread between DPPs and IPPs review teams (1.20); review document requested for certified translation by S. Scarlett in preparation for A. Kim deposition (1.20); search for duplicates and near duplicates (0.40); e-mails with S. Scarlett regarding results (0.50); e-mail to A. Gooding and R. Noh authorizing said translation request (0.50); proofread draft translations of LGC and SDI documents requested in preparation for SW Lee and Albert Kim depositions (0.50).	425.00	5.20	2,210.00	Billable
9/6/2016 212671	Richard Noh WORK Prepare foreign documents for translation (0.50); email correspondence with translation company regarding the same (0.30); update master translation tracking list with recent translations (0.20).	155.00	1.00	155.00	Billable
9/7/2016 212584	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	0.50	77.50	Billable
9/7/2016 212610	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding	425.00	3.40	1,445.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	certified translations requested in preparation for various depositions (0.60); update translation tracking chart accordingly (0.40); e-mails with R. Noh and A. Gooding to coordinate assigning draft translations to be proofread between DPPs and IPPs review teams (0.40); receive and review documents requested for certified translation by S. Scarlett in preparation for deposition of A. Kim (1.20); search for dupes and near dupes in database (0.40); e-mails with A. Gooding and R. Noh authorizing said requests (0.40).				
9/7/2016 212672	Richard Noh WORK Prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20); update master translation tracking list with recent translations (0.30).	155.00	1.50	232.50	Billable
9/8/2016 212585	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); prepare foreign documents for translation (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.10).	155.00	1.00	155.00	Billable
9/8/2016 212612	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.60); update translation tracking chart accordingly (0.60); e-mails with R. Noh and A. Gooding to coordinate assigning draft translations to be proofread between DPPs and IPPs review teams (0.60).	425.00	1.80	765.00	Billable
9/9/2016 212615	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.50); update translation tracking chart accordingly (0.50); e-mails with R. Noh and A. Gooding to coordinate assigning draft translations to be proofread between DPPs and IPPs review teams (0.50); review and proofread draft translations of LGC documents requested for A. Kim depositions (0.50).	425.00	2.00	850.00	Billable
9/9/2016 212673	Richard Noh WORK Email correspondence with translation company regarding revisions to translation.	155.00	0.50	77.50	Billable
9/10/2016 212618	Shinae Kim-Helms WORK Assign draft translations to DPPs and EPPs reviewers for proofreading (0.40); e-mails with Japanese language reviewers regarding same (0.40); e-mails with M. Kuzma regarding same (0.30); review revision by reviewers and forward same to TransPerfect (0.40).	425.00	1.50	637.50	Billable
9/12/2016 212586	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.30).	155.00	1.00	155.00	Billable
9/12/2016 212620	Shinae Kim-Helms WORK Review documents requested for informal translation by D. Lambrinos in preparation for various deposition (0.40); circulate translation of same (0.20); e-mails with L. Chan regarding errors in existing translations (0.30).	425.00	0.90	382.50	Billable
9/13/2016 212623	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with Japanese language review team regarding informal translation assignments requested by D. Lambrinos for deposition of T. Mori (0.40); receive and review document requested for informal translation by D. Lambrinos (0.40); search for duplicates and near duplicates (1.00); e-mails with T. Lee regarding same (0.40); e-mails with H. Rim regarding operative versions of translation and errors in existing translation (0.40); e-mail to R. Noh/A. Gooding authorizing request for correction (0.40).	425.00	3.80	1,615.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/13/2016 212675	Richard Noh WORK Prepare translation for correction (1.00); email correspondence with translation company regarding the same (0.20); review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.20).	155.00	2.00	310.00	Billable
9/14/2016 212626	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.60); update translation tracking chart accordingly (0.40); proofread draft translations of LGC documents requested for A. Kim depositions (1.80); e-mails with H. Rim regarding operative versions of translations (0.40).	425.00	3.20	1,360.00	Billable
9/14/2016 212676	Richard Noh WORK Prepare translation for correction (1.80); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.50).	155.00	3.70	573.50	Billable
9/15/2016 212587	Anna Gooding WORK Update master tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10).	155.00	0.80	124.00	Billable
9/15/2016 212629	Shinae Kim-Helms WORK Review e-mail correspondences between TransPerfect and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); teleconferences with H. Rim regarding operative versions of translations (0.50); review document requested for certified translation by H. Rim in preparation of NS Choi deposition (0.50); search for duplicates in database (0.40); e-mail to R. Noh authorizing said request (0.20); proofread of draft translation of LGC translation requested for A. Kim deposition (1.20).	425.00	3.60	1,530.00	Billable
9/15/2016 212677	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.60).	155.00	1.80	279.00	Billable
9/16/2016 212632	Shinae Kim-Helms WORK Review e-mail correspondences between TransPerfect and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (1.20); proofread draft translations of LGC documents requested for A. Kim depositions (1.20); e-mails with R. Noh regarding updated deposition exhibit index (0.40).	425.00	3.20	1,360.00	Billable
9/19/2016 212636	Shinae Kim-Helms WORK E-mails with H. Rim regarding existing certified translations (0.40); receive and review documents requested for translation by H. Rim and L. Chan in preparation for KS Lee depositions and turnaround time of translation requests (0.40); search database for duplicates and near duplicates (0.40); e-mail to Consortra to submit said request (0.40); review updated deposition exhibit index prepared by R. Noh (1.20); circulate same (0.20).	425.00	3.00	1,275.00	Billable
9/19/2016 212678	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.60); review certified translations for formatting accuracy (1.80); update master translation tracking list with recent translations (1.20); update master deposition list per the request of S. Kim-Helms (1.10).	155.00	4.70	728.50	Billable
9/20/2016 212589	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.60).	155.00	1.00	155.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/20/2016 212640	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.20); e-mails with Japanese language review team (0.20); e-mails with H. Rim regarding need for translation of documents with minimal foreign language (0.40); receive request for translation from H. Rim in preparation for KS Lee deposition (0.40); e-mails with R. Noh regarding same (0.40).	425.00	1.80	765.00	Billable
9/20/2016 212679	Richard Noh WORK Update translation status per the request of S. Kim-Helms (0.70); prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.30).	155.00	2.00	310.00	Billable
9/21/2016 212645	Shinae Kim-Helms WORK E-mails with H. Rim regarding KS Lee documents for translation.	425.00	0.50	212.50	Billable
9/22/2016 212591	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation per request of S. Kim-Helms (0.60).	155.00	1.00	155.00	Billable
9/22/2016 212649	Shinae Kim-Helms WORK Review and analyze documents requested for translation by D. Lambrinos in preparation for NS Choi and Goto depositions (0.40); search database for duplicates and near duplicates (0.40); e-mails with D. Lambrinos regarding same (0.40); receive and review documents requested for certified translation by H. Rim in preparation for KS Lee deposition (0.40); search database for duplicates and near duplicates (0.40); e-mails with H. Rim regarding same (0.40); e-mail to Consortra regarding said request (0.40); review documents relevant for KS Lee per H. Rim (0.60); e-mails with H. Rim regarding errors in existing translations (0.40).	425.00	3.80	1,615.00	Billable
9/23/2016 212651	Shinae Kim-Helms WORK E-mails with H. Rim regarding potential KS Lee hot documents for translation and embedded files thereof (0.40); review said documents and analyze relevance to deponent (0.70); review documents requested for certified translation by D. Lambrinos in preparation for Goto depositions (1.20); search database for duplicates and near duplicates (0.40); e-mails with D. Lambrinos regarding same (0.40); e-mail to Consortra requesting said certified translations (0.40).	425.00	3.50	1,487.50	Billable
9/25/2016 212655	Shinae Kim-Helms WORK E-mails with H. Rim regarding translation requests for Paul Kwon depositions.	425.00	0.20	85.00	Billable
9/26/2016 212657	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding list of translations requested for NS Choi deposition(0.40); e-mails with B. Troxel regarding native versions of documents requested for translation (0.40); search for duplicates and near duplicates in database (0.40); review KS Lees hot document list from D. Lambrinos for translation (1.20); e-mails with D. Lambrinos regarding same (0.40).	425.00	2.80	1,190.00	Billable
9/27/2016 212592	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation per request of S. Kim-Helms (0.60).	155.00	1.00	155.00	Billable
9/27/2016 212659	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); review and revise draft translations prepared by Consortra (1.20); e- mails with H. Hsu and S. Scarlett regarding draft translation of document containing Chinese language (0.40); review document requested for certified translation by H. Rim in preparation for Paul Kwon deposition (1.20); e-mails with H. Rim regarding same (0.40); search for duplicates and near duplicates (0.60); teleconference with N. Cihlar to discuss status updates (0.50); teleconference	425.00	6.80	2,890.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	with V. Glaze regarding status of preparation for upcoming depositions (0.50); review exhibits entered in past month collected by A. Gooding (1.20).				
9/27/2016 212680	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (1.00); update master translation tracking list with recent translations (1.00).	155.00	2.00	310.00	Billable
9/28/2016 212593	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); prepare foreign documents for translation (0.60); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy per request of S. Kim-Helms (0.60).	155.00	2.00	310.00	Billable
9/28/2016 212661	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); review and revise draft translations prepared by Consortra (0.40); review documents requested for certified translation by H. Rim in preparation for Paul Kwon deposition (0.80); e-mails with H. Rim regarding same (0.40); search for duplicates and near duplicates (0.40); e-mails with R. Noh regarding said translation status (0.40); teleconference with H. Rim regarding said translation request (0.50); run brief searches for [redacted] (0.40); e-mail to R. Noh authorizing said request (0.20); review documents requested for certified translation by D. Lambrinos in preparation for KS Lee deposition (0.40); e-mails with D. Lambrinos regarding same (0.40); search for duplicates and near duplicates (0.40); e-mail to R. Noh authorizing said translation request (0.20); teleconference with H. Rim regarding LGC meeting minutes and cover letters (0.50); e-mails with H. Rim regarding duplicate documents in LGC production (0.40).	425.00	6.60	2,805.00	Billable
9/28/2016 212681	Richard Noh WORK Update translation status per the request of S. Kim-Helms (2.00); prepare foreign documents for translation (1.00); format excel translation per the request of S. Kim-Helms (2.10); email correspondence with translation company regarding revisions to translation (0.50).	155.00	5.60	868.00	Billable
9/29/2016 212664	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); review and revise draft translations prepared by Consortra (1.20); review documents requested for certified translation by V. Glaze in preparation for KS Lee deposition (1.20); e-mails with V. Glaze and R. Noh regarding same (0.40); e-mail to R. Noh authorizing said request (0.20); run searches for duplicates and near duplicates (1.00); e-mail available translation produced by LGC to Consortra (0.40); proofread draft translations prepared by Consortra in preparation for SK Lee deposition (1.80).	425.00	7.00	2,975.00	Billable
9/29/2016 212682	Richard Noh WORK Review certified translations for formatting accuracy (2.20); email correspondence regarding the same (0.30); email correspondence with translation company regarding revisions to translations (0.30); prepare foreign documents for translation (1.10).	155.00	3.90	604.50	Billable
9/30/2016 212666	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); review and revise draft translations prepared by Consortra (1.20); proofread draft translations prepared by Consortra in preparation for SK Lee deposition (1.60); receive and review documents requested to be certified by H. Rim in preparation for Paul Kwon deposition (1.20); search for duplicates and near duplicates in database (1.00); e-mails with H. Rim regarding translation request (0.40).	425.00	6.20	2,635.00	Billable
9/30/2016 212683	Richard Noh WORK Review certified translations for formatting accuracy (2.10); email correspondence with translation company regarding revisions to translations (0.20); prepare foreign documents for translation (1.00);	155.00	3.60	558.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	email correspondence with translation company regarding the same (0.30).				
10/3/2016 212668	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding status of outstanding certified translation requested for KS Lee deposition (0.50); receive and review documents requested for certified translation by H. Rim in preparation for P. Kwon deposition (0.60); search for duplicates and near duplicates in database (0.50); e-mail to A. Gooding authorizing said translation request (0.20).	425.00	1.80	765.00	Billable
10/3/2016 212996	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (1.40); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.30).	155.00	2.50	387.50	Billable
10/4/2016 212997	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.70); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.90).	155.00	3.00	465.00	Billable
10/4/2016 213097	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.40); review document requested for urgent translation by D. Lambrinos for SK Lee Deposition (0.40); send email to A. Gooding authorizing said request (0.40); e-mails with H. Rim regarding translation related issues (0.40); receive and review document requested for translation by H. Rim in preparation for P. Kwon deposition (0.40); search for duplicates and near duplicates in database (0.40); e-mail to A. Gooding/R. Noh authorizing said request (0.40); e-mails with H. Rim regarding said request (0.40); proofread draft translations requested for P. Kwon depositions (0.40).	425.00	3.80	1,615.00	Billable
10/5/2016 212998	Richard Noh WORK Format foreign original to match translation per the request of S. Kim-Helms (2.30); format excel translations per the request of S. Kim-Helms (1.20); prepare translations for recertification (0.60); email correspondence with translation company regarding the same (0.10); prepare foreign documents for translation (0.50); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.20).	155.00	5.00	775.00	Billable
10/5/2016 213022	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation (0.20); check for duplicates (0.80); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20); email correspondence with translation company regarding the same (0.10); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
10/5/2016 213098	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); teleconference with Consortra regarding urgent request for SK Lee deposition (0.20); follow up with Consortra regarding same by email (0.20); e-mails with D. Lambrinos and A. Gooding regarding said urgent request (0.20); review documents from M. Caylao regarding missing attachments (0.40); e-mail to M. Caylao and D. Lambrinos analysis thereof (0.20); review and proofread draft translations requested for Paul Kwon depositions (0.20); receive and review document requested for translation by H. Rim for JY Youn depositions (0.40); search for duplicates and near duplicates in database (0.40); e-mail to R. Noh authorizing said translation request (0.30); e-mails with H. Rim regarding same (0.20).	425.00	3.50	1,487.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/6/2016 213000	Richard Noh WORK Email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (1.40); email correspondence with translation company regarding revisions to translations (0.10); update master translation tracking list with recent translations (0.50).	155.00	2.50	387.50	Billable
10/6/2016 213024	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits (1.80); prepare foreign documents for translation (0.40); check for duplicates (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.40).	155.00	2.90	449.50	Billable
10/6/2016 213100	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); receive and review documents requested for translation by H. Rim in preparation for JY Youn depositions (1.20); receive and review documents requested by D. Lambrinos for N. Choi deposition (1.20); search for duplicates and near duplicates (0.80); e-mail to A. Gooding and R. Noh authorizing said request (0.40); e-mails with D. Lambrinos and H. Rim regarding same (0.40); proofread draft translations of LGC and SDI document requested for upcoming depositions (0.40).	425.00	5.20	2,210.00	Billable
10/7/2016 213001	Richard Noh WORK Format excel translations per the request of S. Kim-Helm (2.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.10); update master translation tracking list with recent translations (0.90).	155.00	4.40	682.00	Billable
10/7/2016 213102	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.60); proofread draft translation prepared by Consortra (2.10); e-mails with N. Cihlar regarding deposition interpreters (0.40).	425.00	3.50	1,487.50	Billable
10/10/2016 213103	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.80); update translation tracking chart accordingly (0.40); receive and review documents requested for certified translation by D. Lambrinos (1.30); search for duplicates and near duplicates in database (0.40); e-mails with D. Lambrinos and M. Caylao regarding same (0.40); e-mail to R. Noh authorizing said translation request (0.20).	425.00	3.50	1,487.50	Billable
10/11/2016 213003	Richard Noh WORK Prepare foreign documents for translation (1.90); email correspondence with translation company regarding the same (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding revisions to translations (0.20); update master translation tracking list with recent translations (0.80); review recertified translation to ensure all changes were implemented per the request of S. Kim-Helms (1.50).	155.00	6.00	930.00	Billable
10/11/2016 213027	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.60); finalizing translations per request of S. Kim-Helms (0.40).	155.00	1.70	263.50	Billable
10/11/2016 213105	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with H. Rim regarding transliteration of deponents name	425.00	6.40	2,720.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.40); e-mails with D. Lambrinos regarding status of outstanding translations (0.40); e-mails with R. Noh regarding same (0.40); proofread draft translations of LGC documents prepared by TransPerfect (0.40); receive and review documents requested for certified translation by D. Lambrinos and M. Caylao in preparation for Goto deposition (0.40); search for duplicates and near duplicates (0.40); e-mails with D. Lambrinos and M. Caylao regarding said request (0.40); receive and review documents requested for certified translation by A. Kikuchi in preparation for Goto deposition (0.40); search for duplicates and near duplicates (0.40); e- mails with A. Kikuchi regarding same (0.40); e-mail to A. Gooding authorizing said request (0.40); receive and review documents requested for certified translation by JY Youn deposition (0.40); search for duplicates and near duplicates (0.40); e-mails with H. Rim regarding same (0.40).				
10/12/2016 Richard Noh 213005 WORK	Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.50); update master translation tracking list with recent translations (0.60).	155.00	2.30	356.50	Billable
10/12/2016 Anna Gooding 213029 WORK	Update master translation tracking list with recent translations (0.50); prepare foreign documents for translation (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.60).	155.00	1.90	294.50	Billable
10/12/2016 Shinae Kim-Helms 213107 WORK	Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.80); update translation tracking chart accordingly (0.40); e-mails with H. Rim regarding transliteration of deponents name (0.40); e-mail to R. Noh authorizing request to change transliteration of deponents name in certified translations (0.40); e-mails with D. Lambrinos regarding informal translation assignment (0.40); e-mail with T. Lee regarding same (0.40); proofread draft translations of LGC documents (1.80).	425.00	4.60	1,955.00	Billable
10/13/2016 Shinae Kim-Helms 213109 WORK	Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.70); update translation tracking chart accordingly (0.40); receive and review documents requested for certified translation by D. Lambrinos for Goto depositions (0.40); search for duplicates and near duplicates (0.40); e-mail to R. Noh for estimated costs (0.40); e-mails with D. Lambrinos regarding same (0.40); proofread draft translations of LGC documents (1.20).	425.00	3.90	1,657.50	Billable
10/14/2016 Richard Noh 213006 WORK	Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.90); update master translation tracking list with recent translations (0.30).	155.00	1.40	217.00	Billable
10/14/2016 Shinae Kim-Helms 213110 WORK	Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); receive and review documents requested for certified translation by D. Lambrinos for Goto depositions (0.40); search for duplicates and near duplicates (0.40); e-mail to R. Noh for estimated costs (0.40); e-mails with D. Lambrinos regarding same (0.40); e-mails with B. Troxel regarding documents attached to [redacted] (0.40); proofread draft translations of SDI documents (1.00).	425.00	3.80	1,615.00	Billable
10/17/2016 Richard Noh 213007 WORK	Update translation status per the request of S. Kim-Helms (1.00); review certified translations for formatting accuracy (2.00); email correspondence with translation company regarding revisions to translations (0.50); update master translation tracking list with recent translations (0.50).	155.00	4.00	620.00	Billable
10/17/2016 Anna Gooding 213033 WORK	Update master translation tracking list with recent translations and docket exhibits (1.50); email	155.00	3.00	465.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.50).				
10/17/2016 213112	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); receive and review documents requested for certified translation by D. Lambrinos in preparation for Goto deposition (0.40); search for duplicates and near duplicates in database (0.40); e-mails with D. Lambrinos regarding same (0.40); e-mail to A. Gooding/ R. Noh authorizing said request (0.20); correspondence with T. Lee regarding informal translation (0.20); e-mails with H. Rim regarding mis-coding of attorneys notes section (0.40); proofread draft translation of LGC document requested for JY Youn deposition (0.30); e-mails with H. Rim regarding status of JY Youn translation (0.40).	425.00	3.50	1,487.50	Billable
10/18/2016 213008	Richard Noh WORK Update translation status per the request of S. Kim-Helms (1.00); prepare foreign documents for translation (0.90); email correspondence with translation company regarding the same (0.30); review certified translations for formatting accuracy (0.40); email correspondence with translation company regarding revisions to translations (0.80); update master translation tracking list with recent translations (0.60).	155.00	4.00	620.00	Billable
10/18/2016 213113	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.50); receive and review documents requested for certified translation by D. Lambrinos in preparation for Goto deposition (0.40); search for duplicates and near duplicates (0.40); e-mails with R. Noh regarding same (0.20); e-mail D. Lambrinos recommendations to said request (0.20); e-mail to R. Noh/A. Gooding authorizing said request (0.10); receive and review documents requested for certified translation by A. Kikuchi in preparation for Goto deposition (0.40); search for duplicates and near duplicates (0.50); e-mails with R. Noh regarding same (0.20); e-mail D. Lambrinos recommendations to said request (0.20); e-mail to R. Noh/A. Gooding authorizing said request (0.20); e-mails with D. Lambrinos regarding documents to be informally translated (0.20); e-mails with T. Lee regarding portions to be translated (0.40).	425.00	4.10	1,742.50	Billable
10/19/2016 213036	Anna Gooding WORK Update master translation tracking list with recent translations and docket exhibits per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
10/19/2016 213114	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); receive and review documents requested for certified translation by A. Kikuchi in preparation for Goto deposition (0.40); search database for duplicates and near duplicates (0.40); e-mails with A. Kikuchi regarding same (0.20); e-mails with A. Gooding and R. Noh regarding assigning draft translations for proofreading (0.40); proofread SDI documents requested for JY Youn deposition (0.40); review DAPs translations submitted with [redacted] (0.40); e-mail discussion with A. Gooding regarding same (0.40); e-mails with S. Nozaki regarding SDI and LG cast of characters (0.40).	425.00	3.80	1,615.00	Billable
10/20/2016 213010	Richard Noh WORK Prepare foreign documents for translation (0.50); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.40).	155.00	1.00	155.00	Billable
10/20/2016 213116	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with H. Rim regarding time frame for rush translations (0.40); e-mails with H. Rim regarding translation suffix (0.30).	425.00	1.50	637.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/21/2016 213012	Richard Noh WORK Prepare foreign documents for translation (1.00); email correspondence with translation company regarding the same (0.20); email correspondence with translation company regarding revisions to translations (0.30); update master translation tracking list with recent translations (0.80); update translation status per the request of S. Kim-Helms (0.70).	155.00	3.00	465.00	Billable
10/21/2016 213118	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.20); e-mails with R. Noh regarding JY Youn translation status (0.20); e-mails with R. Noh regarding operative versions of translations previously entered into record (0.20); receive and review document requested for translation by H. Rim in preparation for Shimokomaki hearing (1.20); search for duplicates and near duplicates (0.40); e-mails with H. Rim regarding same (0.40); e-mail to R. Noh authorizing said request (0.40); teleconference with H. Rim regarding translations prepared by DAPs (0.20); receive and review document requested for translation by D. Lambrinos in preparation for Goto deposition (0.20); search for duplicates and near duplicates (0.20); e-mails with D. Lambrinos and S. Nozaki regarding same (0.20); submit said translation request to Consortra (0.20).	425.00	4.20	1,785.00	Billable
10/23/2016 213120	Shinae Kim-Helms WORK E-mails with D. Lambrinos regarding translation request [redacted]	425.00	0.30	127.50	Billable
10/24/2016 213014	Richard Noh WORK Prepare foreign documents for translation (0.70); email correspondence with translation company regarding the same (0.10); update master translation tracking list with recent translations (0.20).	155.00	1.00	155.00	Billable
10/24/2016 213041	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); email correspondence with translation company regarding the same per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
10/24/2016 213121	Shinae Kim-Helms WORK Receive and review document requested for translation by D. Lambrinos in preparation for Goto deposition (0.40); search for duplicates and near duplicates (0.80); e-mails with D. Lambrinos regarding same (0.40); e-mails with S. Scarlett and H. Hsu regarding proofreading translation requested for Shimokomaki hearing (0.40); e-mails with H. Rim and T. Lee regarding same (0.40); e-mails with R. Noh regarding translation status (0.40); e-mail to D. Lambrinos list of documents requested for translation in preparation for Goto deposition and status thereof (0.40).	425.00	3.20	1,360.00	Billable
10/25/2016 213043	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation per request of S. Kim-Helms (0.30).	155.00	0.50	77.50	Billable
10/25/2016 213124	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.30); update translation tracking chart accordingly (0.30); receive and review certified translations prepared by DAPs (0.30); cross-check same against translation tracking chart (0.30); e-mails with D. Lambrinos regarding same (0.20); e-mails with T. Lee regarding draft translations to proofread prior to Goto depositions (0.30); e-mails with D. Lambrinos regarding rush translations to be requested for Goto depositions (0.30); receive and review documents requested for certified translation by D. Lambrinos and H. Rim in preparation for Goto and JY Youn deposition (0.30); search for duplicates and near duplicates in database (0.30); recommend documents worth translating to D. Lambrionos and H. Rim (0.30); oversee translation request to A. Gooding/R. Noh (0.20).	425.00	3.10	1,317.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/26/2016 213046	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.70).	155.00	1.70	263.50	Billable
10/26/2016 213125	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.30); update translation tracking chart accordingly (0.50); receive and review documents requested for certified translation by H. Rim in preparation for JY Youn deposition (0.30); search for duplicates and near duplicates in database (0.50); recommend documents worth translating to H. Rim (0.30); review documents for translation need per H. Rim (0.30); e-mails with H. Rim regarding same (0.30); receive request to correct errors in certified translation from H. Rim (0.30); e-mail to A. Gooding/R. Noh authorizing said request (0.20).	425.00	3.00	1,275.00	Billable
10/27/2016 213017	Richard Noh WORK Format excel translation per the request of S. Kim-Helms (4.00); update master translation tracking list with recent translations (1.00); update master deposition list (1.00).	155.00	6.00	930.00	Billable
10/27/2016 213127	Shinae Kim-Helms WORK Review e-mail correspondence between Consortra and A. Gooding /R. Noh to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.30); receive and review draft translations requested as rush for Goto deposition (0.30); e-mails with T. Lee regarding status of draft translations requested for Goto depositions (0.30); run searches for documents related to illegally obtained information per D. Lambrinos and review same (0.60); e-mail list of results to D. Lambrinos (0.30).	425.00	2.20	935.00	Billable
10/28/2016 213130	Shinae Kim-Helms WORK Review e-mail correspondence between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); review draft e-mails prepared by E. Miorin to Consortra to finalize requested certified translation (0.60); receive and review documents requested for translation by H. Rim in preparation for YS Kim deposition (1.20); search for duplicates and near duplicates (0.40); e-mail to A. Gooding/E. Miorin instructing said request (0.40); e-mails with H. Rim regarding time line for requesting translation in preparation for YS Kim deposition (0.40).	425.00	3.80	1,615.00	Billable
10/31/2016 213052	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.10); finalizing translations (0.20); code finalized CTs on Catalyst per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable
10/31/2016 213131	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with V. Glaze and A. Kikuchi regarding status of checking draft translations to be finalized for Goto deposition (0.40); e-mails with M. Caylao and S. Nozaki regarding Goto exhibits (0.40); review said exhibits accordingly (1.20); check status of Goto files and circulate same to IPPs and DPPs deposition teams (0.40); teleconference with A. Gooding and E. Miorin regarding handling of DAPs translations exchanged before Goto depos (0.50).	425.00	3.70	1,572.50	Billable
11/1/2016 213420	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); finalizing translations per request of S. Kim-Helms (2.00).	155.00	3.80	589.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/1/2016 213459	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with A. Gooding regarding formatting of certified translations to be used in Goto depositions (0.40); teleconference with E. Miorin regarding status of translations to be finalized (0.50); e-mails with H. Rim regarding status of translation files requested for JY Youn depositions (0.40); review revisions prepared by Consortra (0.40); proofread draft translations prepared by Consortra in preparation for JY Youn depositions (1.20).	425.00	3.70	1,572.50	Billable
11/1/2016 213552	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.60); prepare foreign documents for translation (0.40); check for duplicates (1.20); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (1.40); email correspondence with translation company regarding the same (0.20); provide translation status update per request of S. Kim-Helms (0.80).	155.00	5.00	775.00	Billable
11/2/2016 213423	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); update exhibit list with recent depositions (2.00); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.10); finalizing translations per request of S. Kim-Helms (0.30).	155.00	4.00	620.00	Billable
11/2/2016 213463	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); receive and review document requested for rush translation in preparation for JY Youn deposition by H. Rim (0.40); search for duplicates and near duplicates in database (0.40); e-mails with H. Rim with recommendation of documents to certify (0.30); e-mail authorization of said rush request to A. Gooding/E. Miorin (0.40); proofread draft translations prepared by Consortra in preparation for JY Youn depositions (0.40); teleconference with E. Miorin regarding status of outstanding translations to be finalized for JY Youn deposition (0.50); [redacted] (0.40); e-mails to A. Gooding regarding same (0.40).	425.00	4.00	1,700.00	Billable
11/2/2016 213554	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.50); prepare foreign documents for translation (0.50); check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.50); review certified translations for formatting accuracy (0.20); provide translation status update per request of S. Kim-Helms (0.10).	155.00	2.80	434.00	Billable
11/3/2016 213426	Anna Gooding WORK Update master translation tracking list with recent translations (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20).	155.00	0.40	62.00	Billable
11/3/2016 213466	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.30); receive and review documents requested for rush certified translation by H. Rim in preparation for JY Youn depositions (0.40); search duplicates and near duplicates (0.40); e-mails with H. Rim regarding same (0.20); e-mails with E. Miorin regarding said request (0.20); review draft request email prepared by E. Miorin (0.20); [redacted] (0.20); e-mails with E. Miorin regarding same (0.20); check custodian of Sony document per M. Caylao (0.20).	425.00	2.50	1,062.50	Billable
11/3/2016 213555	Elizabeth Miorin WORK Update master translation tracking list with recent translations (1.00); prepare foreign documents for translation (0.20); check for duplicates (0.80); email correspondence with translation company	155.00	3.30	511.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	regarding revisions to translations (0.30); review certified translations for formatting accuracy (0.50); provide translation status update per request of S. Kim-Helms (0.50).				
11/4/2016 213472	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with E. Miorin to finalize outstanding translations requested for JY Youn deposition (0.40); [redacted] (0.40); check translation status and check for duplicates with available translation (0.40); e-mails with V. Glaze regarding same (0.40); proofread draft translations requested for JY Youn depositions (0.60); review documents selected as potential exhibits for Goto deposition (0.40); e-mails with D. Lambrinos regarding need for certified translation of said documents (0.20).	425.00	3.60	1,530.00	Billable
11/4/2016 213556	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.30); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.50); provide translation status update per request of S. Kim-Helms (0.50)..	155.00	2.50	387.50	Billable
11/5/2016 213473	Shinae Kim-Helms WORK Finalize revisions to draft translation and forward to Consortra.	425.00	0.50	212.50	Billable
11/7/2016 213429	Anna Gooding WORK Email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.30).	155.00	0.40	62.00	Billable
11/7/2016 213476	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.20); review request from H. Rim to correct errors in certified translation (0.20); e-mails to TransPerfect (0.20); e-mails with T. Lee regarding translation related issues (0.30); e-mails with H. Rim regarding translations in JY Youn potential exhibits (0.30); review said translations (0.30); e-mails with A. Gooding and E. Miorin to finalize outstanding certified translation requested for JY Youn depositions (0.30); [redacted] (0.30)	425.00	2.30	977.50	Billable
11/7/2016 213557	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.30); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.70); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.50); provide translation status update per request of S. Kim-Helms (0.50).	155.00	3.00	465.00	Billable
11/8/2016 213479	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with H. Rim regarding status of outstanding certified translations requested for JY Youn depositions (0.40); receive and review revision requests by H. Rim in preparation for JY Youn depositions (0.40); e-mails to E. Miorin authorizing said request (0.40); review draft email prepared by E. Miorin (0.70); teleconference with E. Miorin regarding sharefile site and outstanding files to be finalized before JY Youn depos (0.50)	425.00	3.20	1,360.00	Billable
11/8/2016 213558	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.80); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.70); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.50); provide translation status update per request of S. Kim-Helms (1.00).	155.00	4.00	620.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/9/2016 213432	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.10); finalizing translations per request of S. Kim-Helms (0.50).	155.00	2.00	310.00	Billable
11/9/2016 213483	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with A. Gooding regarding translation files to be re-uploaded to shared site (0.30); review said files (0.40).	425.00	1.50	637.50	Billable
11/9/2016 213559	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.20); provide translation status update per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
11/10/2016 213435	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.10); finalizing translations per request of S. Kim-Helms (0.60).	155.00	2.90	449.50	Billable
11/10/2016 213487	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding /E. Miorin to finalize outstanding certified translations requested in preparation for various depositions (0.20); update translation tracking chart accordingly (0.30).	425.00	0.50	212.50	Billable
11/10/2016 213560	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation and check for duplicates (0.60); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.40); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
11/11/2016 213438	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
11/11/2016 213491	Shinae Kim-Helms WORK E-mails with V. Glaze regarding certified translation related issues (0.20); confer with E. Miorin and A. Gooding regarding newly entered exhibits and updating deposition exhibit index (0.30); prepare list of exhibits that are missing in court reporter site (0.20); e-mail to B. Troxel regarding same (0.30).	425.00	1.00	425.00	Billable
11/14/2016 213441	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
11/15/2016 213443	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	3.00	465.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/16/2016 213445	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	3.00	465.00	Billable
11/17/2016 213447	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	3.00	465.00	Billable
11/18/2016 213561	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.50); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.70); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.60); provide translation status update per request of S. Kim-Helms (0.20).	155.00	3.00	465.00	Billable
11/20/2016 213513	Shinae Kim-Helms WORK Search database and analyze documents related to NS Choi [redacted] per D. Lambrinos (1.20); provide D. Lambrinos with summary of hot documents relating to NS Choi (0.30); review documents requested for certified translation by D. Lambrinos (1.20); provide summary of translation status of requested documents (0.30).	425.00	3.00	1,275.00	Billable
11/21/2016 213449	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	3.00	465.00	Billable
11/21/2016 213562	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation and check for duplicates (0.60); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.40); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
11/22/2016 213450	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
11/22/2016 213518	Shinae Kim-Helms WORK E-mails with D. Lambrinos and T. Lee regarding NS Choi document review (0.40); e-mails with D. Lambrinos regarding potential NS Choi exhibits (0.40); e-mail to A. Gooding and E. Miorin authorizing request certified translations of same (0.40); review documents related to Nakahori of Sanyo (0.40); e-mails with T. Lee to prepare informal translation (0.40); review exhibits entered by DAPs (0.50); compare same with Plaintiffs version of translations(0.50); select operative versions and provide instructions to A. Gooding and E. Miorin to upload to shared site and update deposition index and translation tracking chart (0.50).	425.00	3.50	1,487.50	Billable
11/22/2016 213563	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.30); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.70); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (1.50); provide translation status update per request of S. Kim-Helms (0.50).	155.00	4.00	620.00	Billable
11/23/2016 213451	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
11/28/2016 213525	Shinae Kim-Helms WORK E-mails with E. Miorin to revise and reformat informal translations relating to Goto (0.30); review revised informal translations (0.30); circulate same to D. Lambrinos and team (0.40); review documents requested for translation by D. Lambrinos in preparation for NS Choi deposition (0.30); e-mails with D. Lambrinos regarding same (0.30); receive and review potential NS Choi exhibit from DPPs (0.30); e-mails with H. Rim, L. Chan and other NS Choi deposition team regarding same (0.30).	425.00	2.20	935.00	Billable
11/29/2016 213454	Anna Gooding WORK Check translation status per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
11/29/2016 213528	Shinae Kim-Helms WORK E-mails with A. Gooding regarding documents requested for translation by D. Lambrinos in preparation for NS Choi deposition (0.40); analyze requested documents and draft e-mail to D. Lambrinos with assessment (0.40); proofread draft translations of LGC documents requested for NS Choi deposition (1.00); review documents requested for translation by M. Caylao in preparation for NS Choi deposition (0.40); e-mails with A. Gooding regarding same (0.40); e-mails with D. Lambrinos regarding potential NS Choi exhibit (0.40); e-mail to TransPerfect regarding estimates per D. Lambrinos (0.40).	425.00	3.40	1,445.00	Billable
11/30/2016 213456	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation per request of S. Kim-Helms (0.60).	155.00	1.00	155.00	Billable
11/30/2016 213531	Shinae Kim-Helms WORK [redacted] (0.20); [redacted] (0.20); e-mails with E. Miorin regarding same (0.20); e-mails with V. Glaze and C. Smith regarding attachments to said documents (0.20); e-mail D. Lambrinos select documents recommended for translation (0.20); e-mails with V. Glaze regarding potential exhibits for NS Choi deposition (0.20).	425.00	1.20	510.00	Billable
11/30/2016 213564	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation and check for duplicates (0.60); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.40); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
12/1/2016 213536	Shinae Kim-Helms WORK E-mails with T. Lee, D. Lambrinos regarding informal translation to be prepared for NS Choi deposition.	425.00	0.40	170.00	Billable
12/1/2016 214176	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); format excel translations to PDF versions per request of S. Kim-Helms (0.20).	155.00	0.80	124.00	Billable
12/2/2016 213537	Shinae Kim-Helms WORK Receive and review draft translations prepared by Consortra (0.40); assign same to DPP and T. Lee for proofreading (0.40); proofread said draft translations (0.60); receive and review documents requested for translation in preparation for NS Choi deposition (0.40); search for duplicates and near duplicates in database (0.40); e-mails with V. Glaze and C. Smith regarding informal translation to prepare (0.40); e-mail to E. Miorin authorizing rush request for said document (0.40); e-mails with H. Rim regarding time frame for requesting certified translation for upcoming depositions (0.40); e-mails with H. Rim regarding alias of NS Choi (0.40).	425.00	3.80	1,615.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/2/2016 214186	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); prepare foreign documents for translation and check for duplicates (0.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.40); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
12/5/2016 213543	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin and A. Gooding to finalize outstanding translations (0.20); update translation tracking chart accordingly (0.40); e-mails with E. Miorin regarding status of outstanding translations requested for Kiyota deposition (0.10); e-mails with H. Yagihashi regarding same (0.10); receive and review documents requested for certified translation by H. Yagihashi in preparation for Ogawa deposition (0.40); search for duplicates, near duplicates and DOJ translations in database (0.40); e-mail to H. Yagihashi results of said searches and recommendations for translations (0.10); e-mail to E. Miorin authorizing said request (0.40); e-mails with A. Gooding regarding translation tracking chart (0.40); e-mails with H. Yagihashi regarding repository of finalized certified translations and informal translation prepared (0.40); receive and review draft translations prepared by Consortra for NS Choi depositions (0.20); assign same to DPPs and T. Lee for proofreading (0.10); proofread draft translations requested for NS Choi depositions (0.40); receive and review draft translations prepared by TransPerfect (0.30); assign same to Japanese language review team for proofreading (0.10); e-mails with D. Lambrinos regarding certified translations requested for NS Choi deposition (0.20); review documents requested for translation by D. Lambrinos for NS Choi deposition (0.40); search for duplicates and near duplicates (0.40); e-mails with D. Lambrinos regarding same (0.20); e-mail to T. Lee to request informal translation (0.20); e-mail with D. Lambrinos regarding certified translation request (0.20); search for set of family documents per D. Lambrinos (0.40).	425.00	6.00	2,550.00	Billable
12/5/2016 214177	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); update exhibit list with recent depositions (0.20); review certified translations for formatting accuracy (0.60); email correspondence with translation company regarding the same (0.10); format excel translations to PDF form per request of S. Kim-Helms (0.80).	155.00	1.90	294.50	Billable
12/5/2016 214187	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (0.20); provide translation status update per request of S. Kim-Helms (0.20).	155.00	1.00	155.00	Billable
12/6/2016 214184	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.30); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (0.20); finalize translations per request of S. Kim-Helms (1.00).	155.00	3.00	465.00	Billable
12/6/2016 214188	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.50); prepare foreign documents for translation and check for duplicates (1.00); email correspondence with translation company regarding revisions to translations (0.70); review certified translations for formatting accuracy (0.60); provide translation status update per request of S. Kim-Helms (0.20).	155.00	3.00	465.00	Billable
12/6/2016 214193	Shinae Kim-Helms WORK Review e-mails between E. Miorin/A. Gooding and Consortra to finalize outstanding translations requested for NS Choi depositions (0.40); e-mails with E. Miorin and A. Gooding regarding status of outstanding translations (0.40); e-mails with V. Glaze regarding status of outstanding certified translations requested for NS Choi deposition (0.40); e-mails with M. Caylao regarding attachments to documents requested for translation (0.40); create metadata files for potential exhibits per D. Lambrinos (1.40); e-mails with E. Miorin regarding untranslated portion in translations requested for NS Choi deposition (0.40); e-mails with D. Lambrinos regarding potential exhibits to NS Choi	425.00	3.80	1,615.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	deposition (0.40).				
12/7/2016 214194	Shinae Kim-Helms WORK Review e-mails between E. Miorin/A. Gooding and Consortra to finalize outstanding translations requested for NS Choi depositions (0.70); e-mails with E. Miorin and A. Gooding regarding status of outstanding translations (0.70); circulate finalized copies of certified translations to NS Choi deposition team (0.60).	425.00	2.00	850.00	Billable
12/9/2016 214196	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for YS Kim deposition (0.40); search for duplicates and near duplicates (1.00); evaluate said documents for translation (0.50); e-mails with H. Rim (0.40); e-mails with H. Rim regarding time line for translation preparation for upcoming depositions and Catalyst search inaccuracies (0.40); receive request for correction of certified translation from H. Rim (0.40); e-mail to A. Gooding authorizing said request (0.20).	425.00	3.30	1,402.50	Billable
12/12/2016 214185	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); prepare and send foreign documents for translation per request of S. Kim Helms (0.50).	155.00	1.00	155.00	Billable
12/12/2016 214197	Shinae Kim-Helms WORK E-mails with A. Gooding regarding translation tracking chart (0.50); review documents requested for translation by H. Rim in preparation for Takeda and YS Kim depositions (0.40); search for duplicates, near duplicates and available translations (0.40); e-mail to A. Gooding authorizing said request (0.40); e-mails with A. Gooding regarding volume of request(0.40); e-mails with H. Rim regarding same (0.40).	425.00	2.50	1,062.50	Billable
12/13/2016 214183	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare and send foreign documents for translation (0.10); send finalized translations for correction per request of S. Kim-Helms (0.70).	155.00	1.00	155.00	Billable
12/16/2016 214178	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	5.50	852.50	Billable
12/16/2016 214189	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.10); provide translation status update per request of S. Kim-Helms (0.20).	155.00	0.80	124.00	Billable
12/16/2016 214201	Shinae Kim-Helms WORK E-mails with H. Rim regarding translation request in preparation for YS Kim deposition (0.20); review said document (0.20); e-mail to A. Gooding and E. Miorin authorizing said request (0.10).	425.00	0.50	212.50	Billable
12/19/2016 214179	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	7.00	1,085.00	Billable
12/19/2016 214190	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20); provide translation status update per request of S. Kim-Helms (0.20).	155.00	0.90	139.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/19/2016 214202	Shinae Kim-Helms WORK Receive and review draft translations from Consortra (0.30); e-mails with A. Gooding and E. Miorin regarding splitting assignments (0.20); proofread draft translations requested for SW Lee deposition (2.00).	425.00	2.50	1,062.50	Billable
12/20/2016 214180	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	6.50	1,007.50	Billable
12/20/2016 214204	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding and E. Miorin to finalize outstanding translations requested for various translations (0.40); review documents requested for translation by V. Glaze for SW Lee deposition (1.00); search for duplicates and near duplicates (0.90); e-mails with V. Glaze regarding same (0.40); e-mail to A. Gooding and E. Miorin authorizing said request (0.40).	425.00	3.10	1,317.50	Billable
12/21/2016 214181	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); finalize translations (1.00); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	2.80	434.00	Billable
12/21/2016 214207	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for SW Lee depositions (0.30); update translation tracking chart accordingly (0.20).	425.00	0.50	212.50	Billable
12/22/2016 214182	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); code recently finalized translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	0.50	77.50	Billable
12/22/2016 214208	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding and E. Miorin to finalize translations requested for various upcoming depositions (1.20); update translation tracking chart accordingly (0.80); receive and review draft translations prepared by Consortra (1.80); prepare revisions to said translation (1.00).	425.00	4.80	2,040.00	Billable
12/23/2016 214209	Shinae Kim-Helms WORK Receive and review documents requested for certified translation by H. Rim in preparation for Takeda deposition (0.40); search for duplicates and near duplicates (0.40); cross-check against translation tracking chart (0.40); e-mails with H. Rim regarding same (0.20); send translation request to Consortra (0.20); e-mails with H. Rim regarding operative version of SDI document entered in Shimizu deposition (0.40).	425.00	2.00	850.00	Billable
12/24/2016 214210	Shinae Kim-Helms WORK E-mails with Consortra regarding translation request in preparation for Takeda deposition.	425.00	0.20	85.00	Billable
12/27/2016 214212	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.40); search for duplicates and near duplicates (0.40); cross-check against translation tracking chart (0.40); prepare word document based on text view of production (0.40); e-mail to H. Rim regarding same (0.20); e-mail to E. Miorin authorizing said translation request (0.20).	425.00	2.00	850.00	Billable
12/28/2016 214191	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.70); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.50); provide translation status update per request of S. Kim-Helms (0.20).	155.00	1.80	279.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/28/2016 214213	Shinae Kim-Helms WORK Receive and review draft translations prepared by Consortra (0.30); forward same to K. Yamada for proofreading (0.40); e-mails with H. Rim regarding using excel file as exhibits (0.40); receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.40); search for duplicates and near duplicates (0.40); cross-check against translation tracking chart (0.40); e-mail to H. Rim regarding same (0.40); e-mail to E. Miorin authorizing said translation request (0.40).	425.00	3.10	1,317.50	Billable
12/29/2016 214192	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and check for duplicates (0.60); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.4); email correspondence with translation company regarding the same (0.20); provide translation status update per request of S. Kim-Helms (0.20).	155.00	2.00	310.00	Billable
12/29/2016 214214	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.30); search for duplicates and near duplicates (0.40); cross-check against translation tracking chart (0.40); e-mail to H. Rim regarding same (0.10); e-mail to E. Miorin authorizing said translation request (0.10); review password protected document per H. Rim (1.20); provide H. Rim with password for said document (0.10); receive and review revisions to draft translations prepared by K. Yamada (0.10); forward same to Consortra for finalization (0.10).	425.00	2.80	1,190.00	Billable
12/30/2016 214215	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.30); search for duplicates and near duplicates (0.30); cross-check against translation tracking chart (0.30); e-mail to H. Rim regarding scope of translations (0.30); e-mail to A. Gooding and E. Miorin authorizing said translation request (0.30).	425.00	1.50	637.50	Billable
1/2/2017 214317	Shinae Kim-Helms WORK E-mails with E. Miorin regarding certified translation request for Takeada deposition.	425.00	0.30	127.50	Billable
1/2/2017 214587	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); finalizing translations per request of S. Kim-Helms (0.20).	155.00	0.80	124.00	Billable
1/3/2017 214571	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.00	155.00	Billable
1/3/2017 214588	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.30); finalizing translations per request of S. Kim-Helms (0.20).	155.00	0.90	139.50	Billable
1/4/2017 214503	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin to finalize outstanding translations requested for various depositions (0.30); receive and review documents requested for certified translation by H. Rim in preparation for Takeda deposition (0.60); search for duplicates, near duplicates and attachments (0.70); e-mails with H. Rim regarding same (0.30).	425.00	1.90	807.50	Billable
1/4/2017 214572	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.00	155.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/5/2017 214506	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding/E. Miorin to finalize outstanding translations requested Takeda deposition (0.30); receive and review documents requested for certified translation by H. Rim in preparation for Takeda deposition (0.90); search for duplicates and near duplicates (0.30); e-mail to E. Miorin authorizing translation request (0.40); [redacted] (0.30); e-mails with V. Glaze regarding same (0.40); e-mails with E. Miorin regarding translation request for same (0.40).	425.00	3.00	1,275.00	Billable
1/5/2017 214573	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	1.20	186.00	Billable
1/5/2017 214589	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.40); finalizing translations per request of S. Kim-Helms (0.20).	155.00	0.90	139.50	Billable
1/6/2017 214508	Shinae Kim-Helms WORK E-mails with V. Glaze regarding garbled LGC production (0.30); review e-mails between Consortra and E. Miorin/A. Gooding to finalize translations requested for Takeda and SW Lee depositions (0.30); receive and review draft translations prepared by Consortra requested for SW Lee depositions (0.30); e-mails with V. Glaze and T. Lee to proofread same (0.30); proofread and prepare revision to said draft translations (1.20); receive and review document requested for rush translation in preparation for SW Lee deposition by V. Glaze (1.00); e-mails with V. Glaze regarding same (0.30); e-mail to E. Miorin authorizing said translation request (0.30).	425.00	4.00	1,700.00	Billable
1/6/2017 214590	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.20); finalizing translations per request of S. Kim-Helms (0.20).	155.00	0.80	124.00	Billable
1/9/2017 214510	Shinae Kim-Helms WORK Proofread and revise draft translations prepared by Consortra in preparation for SW Lee deposition (1.70); e-mails with V. Glaze regarding draft translations to proofread (0.40); teleconference with V. Glaze regarding same (0.50); e-mails with A. Gooding and E. Miorin regarding status of SW Lee translations to be finalized (0.40); review e-mails between Consortra and A. Gooding/E. Miorin to finalize outstanding translations requested for SW Lee depositions (0.40); teleconference with C. Voigt regarding multiple translation issues (0.50).	425.00	3.90	1,657.50	Billable
1/9/2017 214574	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (1.00).	155.00	1.40	217.00	Billable
1/9/2017 214591	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (0.70).	155.00	3.00	465.00	Billable
1/10/2017 214514	Shinae Kim-Helms WORK Review e-mail correspondences between Consortra and A. Gooding/E. Miorin to finalize outstanding translations requested for SW Lee depositions (0.40); e-mails with V. Glaze and C. Smith regarding outstanding certified translations for SW Lee depositions (0.40); e-mails with H. Rim regarding Aoki deposition and documents requested for said deposition (0.40); receive and review documents requested for translation by H. Rim in preparation for Kasagi deposition (1.10); search for duplicates and near duplicates in database (0.40); e-mail to E. Miorin overseeing translation request from H. Rim to ensure accuracy (0.20).	425.00	2.90	1,232.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/10/2017 214592	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (1.00).	155.00	3.80	589.00	Billable
1/11/2017 214516	Shinae Kim-Helms WORK E-mails with T. Lee regarding draft translations for proofreading in preparation for Takeda deposition.	425.00	0.30	127.50	Billable
1/11/2017 214575	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); multiple correspondence with translation company regarding edits and revisions to translations (0.20); review certified translations for formatting accuracy (0.50); check translation status per request of S. Kim-Helms (0.10).	155.00	1.10	170.50	Billable
1/12/2017 214521	Shinae Kim-Helms WORK E-mails with Consortra regarding lengthy documents requested for certified translation in preparation for Takeda deposition (0.60); e-mails with H. Rim regarding same (0.50); review e-mail correspondences between A. Gooding and Consortra to finalize outstanding certified translations requested for Takeda deposition (0.50); e-mails with T. Lee regarding draft translations to be proofed (0.50).	425.00	2.10	892.50	Billable
1/13/2017 214523	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.40); run searches for duplicates and near duplicates (0.80); e-mail to A. Gooding authorizing said request (0.40); receive and review draft translations prepared by Consortra (1.00); e-mails with V. Glaze regarding said draft translations to be proofread (0.40); e-mails with T. Lee regarding draft translations to be proofread in preparation for Takeda depositions (0.40); review e-mails between Consortra and A. Gooding to finalize outstanding translations requested for Takeda depositions (0.40).	425.00	3.80	1,615.00	Billable
1/13/2017 214576	Anna Gooding WORK Update master translation tracking list with recent translations (0.10); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20).	155.00	0.40	62.00	Billable
1/16/2017 214526	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Takeda deposition (0.40); search for near duplicates and duplicates in database (0.40); e-mails with H. Rim regarding partial translation of document (0.40); receive and review document requested for translation for Takeda deposition from H. Rim (0.80); search for duplicates and near duplicates (0.40).	425.00	2.40	1,020.00	Billable
1/17/2017 214529	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding/E. Miorin to finalize certified translations requested for Takeda depositions (0.70); receive and review draft translations requested for Takeda depositions (1.30); e-mails with H. Rim, V. Glaze and T. Lee to assign same for proofreading (0.40); e-mails with H. Rim regarding time frame for certified translation preparation for upcoming depositions (0.40).	425.00	2.80	1,190.00	Billable
1/17/2017 214577	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); update deposition exhibit list per request of S. Kim-Helms (2.70).	155.00	3.10	480.50	Billable
1/17/2017 214593	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.50); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for	155.00	3.00	465.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	formatting accuracy and email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (0.70).				
1/18/2017 214534	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding/E. Miorin to finalize certified translations requested for Takeda depositions (1.00); e-mails with H. Rim regarding draft translations for proofreading (0.40); proofread draft translations requested for Takeda deposition (3.10).	425.00	4.50	1,912.50	Billable
1/18/2017 214578	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); update deposition exhibit list per request of S. Kim-Helms (2.80).	155.00	3.20	496.00	Billable
1/18/2017 214594	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.90); finalizing translations per request of S. Kim-Helms (0.20).	155.00	1.90	294.50	Billable
1/19/2017 214579	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); update deposition exhibit list (0.20); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy per request of S. Kim-Helms (0.30).	155.00	1.00	155.00	Billable
1/20/2017 214543	Shinae Kim-Helms WORK Assign draft translations to H. Rim and T. Lee (0.10); e-mails with H. Rim and T. Lee regarding same (0.10); receive and review documents requested for certified translation by M. Caylao in preparation for Negi deposition (1.00); search for duplicates and near duplicates in database (0.50); e-mails with M. Caylao regarding same (0.10); e-mail to A. Gooding authorizing said rush translation (0.40); review e-mails between Consortra and A. Gooding/ E. Miorin to finalize outstanding translations for upcoming depositions (0.40); prepare missing translation to finalize outstanding translations (0.40); review and revise draft deposition exhibit index prepared by A. Gooding (0.30); circulate same to co-counsel (0.10); e-mails with H. Rim regarding availability of DAPs translations (0.10).	425.00	3.50	1,487.50	Billable
1/20/2017 214595	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	2.50	387.50	Billable
1/23/2017 214546	Shinae Kim-Helms WORK E-mails with Consortra regarding partially translated files (0.40); review e-mails between Consortra and A. Gooding/ E. Miorin to finalize outstanding translations for upcoming depositions (0.40); e-mails with V. Glaze and K. Yamada regarding outstanding draft translations to proofread (0.40); e-mails with H. Rim regarding outstanding files requested for Takeda depositions (0.40); receive and review draft translations prepared by TransPerfect (0.80); e-mails with E. Miorin regarding outstanding translations to finalize (0.40).	425.00	2.80	1,190.00	Billable
1/23/2017 214580	Anna Gooding WORK Prepare foreign documents for translation (0.10); update tracking chart with recent translations (0.40); finalizing translations per request of S. Kim-Helms (2.00).	155.00	2.50	387.50	Billable
1/23/2017 214596	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.50	697.50	Billable
1/24/2017 214550	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for upcoming depositions (0.40); e-mails with H. Rim and T. Lee regarding draft translations to proofread (0.30); e-mails with H. Rim regarding schedules of upcoming depositions	425.00	1.00	425.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	(0.30).				
1/24/2017 214581	Anna Gooding WORK Update master translation tracking list with recent translations per request of S. Kim-Helms.	155.00	0.20	31.00	Billable
1/24/2017 214597	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	2.00	310.00	Billable
1/25/2017 214555	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for upcoming depositions (0.20); e-mails with Japanese language review team regarding proofreading draft translations for Takeda deposition (0.60); prepare informal translation of document for Takeda deposition (0.40); e-mails with A. Gooding and E. Miorin regarding status of outstanding certified translations (0.20); review travel expenses of Takeda per H. Rim (0.40); e- mails with H. Rim regarding same (0.40).	425.00	2.20	935.00	Billable
1/25/2017 214582	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); email correspondence with translation company regarding revisions to translations (0.10); review certified translations for formatting accuracy (0.20); format excel files into PDF per request of S. Kim-Helms (1.70).	155.00	2.30	356.50	Billable
1/25/2017 214598	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
1/26/2017 214557	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for upcoming depositions (0.30); e-mails with H. Rim and T. Lee regarding proofreading draft translations requested for Takeda and Negi depositions (0.30).	425.00	0.60	255.00	Billable
1/26/2017 214583	Anna Gooding WORK Email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.60); format excel files into PDF per request of S. Kim-Helms (1.40).	155.00	2.20	341.00	Billable
1/26/2017 214599	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
1/27/2017 214560	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for upcoming depositions (0.40); [redacted] (1.20); e-mails with V. Glaze regarding same (0.10); e-mails with H. Rim regarding status of outstanding translations requested for Takeda deposition (0.40); [redacted] (0.40); e-mails with E. Miorin regarding outstanding translations to finalize for Takeda deposition and files to be uploaded to shared site (0.40); translate untranslated portion of document requested for translation for Takeda deposition (1.50); e-mails with H. Rim regarding corrections to be made to certified translations (0.40).	425.00	4.80	2,040.00	Billable
1/27/2017 214584	Anna Gooding WORK Update master translation tracking list with recent translations (0.60); finalize translations per request of S. Kim-Helms (2.20).	155.00	2.80	434.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/27/2017 214600	Elizabeth Miorin WORK Update master translation tracking list and depo exhibit list with recent translations per request of S. Kim-Helms.	155.00	4.00	620.00	Billable
1/30/2017 214562	Shinae Kim-Helms WORK Review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for upcoming depositions (0.40); review and revise draft translations requested as rush for Negi deposition (1.20); e-mails with H. Rim regarding spelling corrections to be made to certified translation (0.10); e-mail to Consortra requesting said corrections (0.10); e-mails with M. Caylao regarding status of certified translations requested for Negi deposition (0.10); receive and review translations prepared by DAPs for Negi deposition (0.70); [redacted] (0.10); e-mail to A. Gooding and E. Miorin authorizing rush request of said document (0.10).	425.00	2.80	1,190.00	Billable
1/30/2017 214585	Anna Gooding WORK Prepare foreign documents for translation (0.60); update master tracking list with recent translations per request of S. Kim-Helms (0.20).	155.00	0.80	124.00	Billable
1/30/2017 214601	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.60); email correspondence with translation company regarding revisions to translations (1.00); review certified translations for formatting accuracy and email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (0.80).	155.00	3.40	527.00	Billable
1/31/2017 214602	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (0.30).	155.00	3.80	589.00	Billable
1/31/2017 214614	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding/ E. Miorin to finalize outstanding certified translations requested for Negi and Takeda depositions (0.40); update translation tracking chart accordingly (0.40); e-mails with A. Gooding and E. Miorin regarding same (0.10); e-mails with V. Glaze regarding missing exhibits entered in Masunaga (0.10); e-mails with H. Rim regarding missing SW Lee exhibits (0.10); receive and review translations prepared by DAPs (0.40).	425.00	1.50	637.50	Billable
1/31/2017 215407	Anna Gooding WORK Update master tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.40); finalize translations per request of S. Kim-Helms (1.00).	155.00	2.10	325.50	Billable
2/1/2017 214833	Shinae Kim-Helms WORK E-mails with V. Glaze regarding missing exhibits entered in Masunaga depositions (0.10); e-mails with A. Gooding regarding same (0.10); e-mails with H. Rim regarding updating translation tracking chart (0.10); review and evaluate certified translations prepared by DAPs (0.10); e-mails with A. Gooding regarding same (0.10).	425.00	0.50	212.50	Billable
2/1/2017 214893	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); update deposition exhibit list per request of S. Kim-Helms (1.00).	155.00	1.20	186.00	Billable
2/2/2017 214837	Shinae Kim-Helms WORK Search for duplicate and near duplicate documents of Negi custodian files per D. Lambrinos (0.30); review and evaluate certified translations prepared by DAPs (0.10); e-mails with A. Gooding regarding same (0.10).	425.00	0.50	212.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/2/2017 214894	Anna Gooding WORK Check for potential competing versions of translations prior to deposition per request of S. Kim-Helms.	155.00	1.10	170.50	Billable
2/2/2017 214928	Elizabeth Miorin WORK Update master translation tracking list with recent translations, check translation status per request of S. Kim-Helms.	155.00	2.20	341.00	Billable
2/3/2017 214895	Anna Gooding WORK Check for potential competing versions of translations prior to deposition (2.00); update master tracking list with recent translations per request of S. Kim-Helms (0.40).	155.00	2.40	372.00	Billable
2/6/2017 214844	Shinae Kim-Helms WORK Receive and review documents requested for translation by H. Rim in preparation for Aoki and YS Kim depositions (0.80); search for duplicates, near duplicates, and attachments (0.80); e-mails with H. Rim regarding same (0.10); e-mail to A. Gooding/ E. Miorin authorizing said translation (0.10).	425.00	1.80	765.00	Billable
2/6/2017 214930	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company requesting translation (0.40); prepare foreign documents for translation and check for duplicates per request of S. Kim-Helms (0.60).	155.00	1.20	186.00	Billable
2/7/2017 214847	Shinae Kim-Helms WORK E-mails with H. Rim regarding cancellation of certified translation request for Aoki deposition (0.30); e-mails with A. Gooding and E. Miorin regarding status of outstanding certified translations (0.20).	425.00	0.50	212.50	Billable
2/7/2017 214898	Anna Gooding WORK Code translations on Catalyst (0.20); update master tracking list per request of S. Kim-Helms (0.90).	155.00	1.10	170.50	Billable
2/9/2017 214853	Shinae Kim-Helms WORK E-mails with J. Moy regarding certified translation list for Aoki deposition (0.70); receive and review documents requested for certified translation by J. Moy for Aoki deposition (1.20); search for duplicates and near duplicates (1.00); assess said documents requested for translation (0.50); e-mails with J. Moy regarding same (0.20); e-mail to A. Gooding/ E. Miorin authorizing said request (0.20).	425.00	3.80	1,615.00	Billable
2/9/2017 214901	Anna Gooding WORK Update master translation tracking list with recent translations (0.30); prepare foreign documents for translation and send to Consortra (0.30); update master deposition list per request of S. Kim-Helms (1.70).	155.00	2.30	356.50	Billable
2/10/2017 214855	Shinae Kim-Helms WORK E-mails with J. Moy regarding certified translations requested for Aoki depositions (0.40); receive and review documents requested for Aoki depositions by H. Rim (0.40); search for duplicates and near duplicates (0.40); e-mails with H. Rim regarding existing translation of near duplicate document (0.30); e-mail to E. Miorin authorizing said translation request (0.10); e-mails with A. Gooding regarding Ex. 2407 entered in Masunaga deposition and review deposition transcript of Masunaga (0.20).	425.00	1.80	765.00	Billable
2/10/2017 214902	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); prepare foreign documents for translation and send to Consortra per request of S. Kim-Helms (2.00).	155.00	2.20	341.00	Billable
2/13/2017 214859	Shinae Kim-Helms WORK Receive and review documents requested for certified translation by J. Moy and H. Rim for Aoki	425.00	4.60	1,955.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	depositions (0.40); search for duplicates and near duplicates in database (0.40); e-mails with J. Moy and H. Rim regarding same (0.40); e-mail to A. Gooding/E. Miorin authorizing said translation request (0.20); teleconference with H. Rim regarding English translation produced by Defendants along with foreign language document (0.50); receive request for correction to Certified translation from H. Rim (0.40); e-mail to A. Gooding/E. Miorin regarding same (0.40); proofread draft translation to LGC document requested for YS Kim deposition (1.20); prepare revision to same (0.70).				
2/13/2017 214933	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company requesting translation (0.40); prepare foreign documents for translation and check for duplicates per request of S. Kim-Helms (1.00).	155.00	1.80	279.00	Billable
2/14/2017 214862	Shinae Kim-Helms WORK E-mails with H. Rim regarding status of certified translations requested for Aoki deposition (0.40); receive and review documents requested for certified translation by J. Moy in preparation for Aoki deposition (0.50); search for duplicates and near duplicates in database (0.80); e-mails with E. Miorin and J. Moy regarding same (0.40); receive and review draft translations prepared by Consortra (0.50); coordinate with DPPs on proofreading (0.10); review e-mails between A. Gooding/ E. Miorin and Consortra to finalize outstanding certified translations requested for Aoki deposition (0.50).	425.00	3.20	1,360.00	Billable
2/14/2017 214934	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy (1.00); email correspondence with translation company regarding the same (1.00); finalizing translations per request of S. Kim-Helms (0.30)..	155.00	3.80	589.00	Billable
2/15/2017 214866	Shinae Kim-Helms WORK E-mails with H. Rim regarding documents with garble text (0.50); review e-mails between A. Gooding/ E. Miorin and Consortra to finalize outstanding certified translations requested for Aoki deposition (1.00); e-mails with V. Glaze regarding potential SH Na exhibits for translation (0.50).	425.00	2.00	850.00	Billable
2/15/2017 214910	Anna Gooding WORK Update master translation tracking list with recent translations (0.40); update deposition exhibit list per request of S. Kim-Helms (2.70).	155.00	3.10	480.50	Billable
2/15/2017 214935	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy (0.80); email correspondence with translation company regarding the same (0.40); finalizing translations per request of S. Kim-Helms (0.20).	155.00	2.40	372.00	Billable
2/16/2017 214869	Shinae Kim-Helms WORK Receive and review e-mails between Consortra and A. Gooding/ E. Miorin to finalize outstanding translations requested for Aoki depositions (0.50); receive and review draft translations requested for Aoki (0.80); assign same to T. Lee and H. Rim for proofreading (0.10); [redacted] (0.40).	425.00	1.80	765.00	Billable
2/16/2017 214913	Anna Gooding WORK Update master translation tracking list with recent translations (0.50); update deposition exhibit list per request of S. Kim-Helms (2.50).	155.00	3.00	465.00	Billable
2/16/2017 214936	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); email correspondence with translation company regarding revisions to translations (0.40); review certified translations for formatting accuracy (0.50); email correspondence with translation company regarding the same (0.50); finalizing translations per request of S. Kim-Helms (0.20).	155.00	1.80	279.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/17/2017 214874	Shinae Kim-Helms WORK E-mails with E. Miorin regarding translation status [redacted]0.40); e-mails with V. Glaze regarding same (0.40); review e-mails between Consortra and E. Miorin/ A. Gooding to finalize outstanding translations requested for Aoki deposition (0.40); receive draft translations prepared by Consortra (0.70); coordinate with DPPs and T. Lee on proofreading the same (0.40); review document requested for certified translation by H. Rim in preparation for Aoki deposition (0.40); search for duplicates and near duplicates (0.40); e-mail to E. Miorin authorizing said translation request (0.40).	425.00	3.50	1,487.50	Billable
2/17/2017 214915	Anna Gooding WORK Update master translation tracking list with recent translations (0.90); update deposition exhibit list per request of S. Kim-Helms (5.10).	155.00	6.00	930.00	Billable
2/17/2017 214937	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.20); send documents to be proofread (0.30); prepare foreign documents for translation and check for duplicates (1.00); multiple email correspondence with translation company regarding proofreading and formatting issues (0.80); finalizing translations per request of S. Kim-Helms (0.20).	155.00	2.50	387.50	Billable
2/20/2017 214877	Shinae Kim-Helms WORK E-mails with H. Rim regarding rush translation requests for Aoki deposition.	425.00	0.40	170.00	Billable
2/21/2017 214880	Shinae Kim-Helms WORK Review e-mails between E. Miorin/A. Gooding and Consortra to finalize outstanding translations requested for Aoki depositions (0.40); receive and review documents requested for rush certified translation by H. Rim in preparation for Aoki deposition (1.20); search for duplicates and near duplicates in database (0.40); e-mails with H. Rim regarding same (0.40); e-mail to A. Gooding/ E. Miorin authorizing said rush request (0.40); review exhibits newly entered by DAPs in past month (0.30); e-mails with A. Gooding regarding same (0.10).	425.00	3.20	1,360.00	Billable
2/21/2017 214917	Anna Gooding WORK Update master translation tracking list with recent translations (0.20); update deposition exhibit list (1.30); prepare and upload DAP translations to shared site per request of S. Kim-Helms (0.70).	155.00	2.20	341.00	Billable
2/21/2017 214938	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.70); email correspondence with translation company requesting translation (0.60); prepare foreign documents for translation and check for duplicates (2.00); format informal translations per request of S. Kim-Helms (0.10).	155.00	3.40	527.00	Billable
2/22/2017 214883	Shinae Kim-Helms WORK Review e-mails between E. Miorin/A. Gooding and Consortra to finalize outstanding translations requested for Aoki depositions (1.70); e-mails with A. Gooding regarding status of outstanding translations requested for Aoki (0.40); e-mails with H. Rim regarding draft translation to proofread (0.40); review and revise updated deposition exhibit index (0.30); e-mails with A. Gooding regarding same (0.10); circulate same to co-counsel (0.10).	425.00	3.00	1,275.00	Billable
2/22/2017 214919	Anna Gooding WORK Update master translation tracking list and depo exhibit list with recent translations (2.00); check translation status (0.80); code translations on Catalyst per request of S. Kim-Helms (0.20).	155.00	3.00	465.00	Billable
2/22/2017 214939	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.60); multiple email correspondence with translation company regarding revisions to translations (0.80); review certified translations for formatting accuracy (0.60); format Excel documents into PDF format to be finalized (1.60); finalize formatting and edits to translations per request of S. Kim-Helms (0.70).	155.00	4.30	666.50	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
2/23/2017 214886	Shinae Kim-Helms WORK Review e-mails between E. Miorin/A. Gooding and Consortra to finalize outstanding translations requested for Aoki depositions (0.40); e-mails with A. Gooding regarding status of outstanding translations requested for Aoki deposition (0.40); receive and review documents requested for rush translation by H. Rim in preparation for Aoki deposition (0.40); search duplicates and near duplicates in database (1.00); e-mails with H. Rim regarding said request (0.40); e-mail to A. Gooding authorizing said request (0.40).	425.00	3.00	1,275.00	Billable
2/23/2017 214921	Anna Gooding WORK Update master translation tracking list with recent translations (1.00); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (0.60); finalize translations (0.80); code on Catalyst per request of S. Kim-Helms (0.20).	155.00	2.80	434.00	Billable
2/24/2017 214887	Shinae Kim-Helms WORK Receive and review documents requested for certified translation by H. Rim in preparation for Aoki deposition (0.40); search for duplicates and near duplicates (0.40); e-mails with H. Rim and L. Chan regarding same (0.40); request said translation to Consortra (0.30).	425.00	1.50	637.50	Billable
2/27/2017 214890	Shinae Kim-Helms WORK Review e-mail correspondences between A. Gooding/ E. Miorin and Consortra to finalize outstanding translations requested for Aoki deposition (0.40); e-mails with H. Rim and L. Chan regarding outstanding translations for Aoki deposition (0.40); e-mails with Consortra regarding outstanding Aoki translations (0.40); update translation tracking chart accordingly (0.40); review potential YS Kim documents (1.20); discuss same with V. Glaze (0.20); prepare translation for Aoki deposition (1.20); e-mails with A. Gooding and E. Miorin regarding status of outstanding translations requested for Aoki deposition (0.20); receive and review request for correction to existing certified translation by H. Rim (0.40); e-mail said request to Consortra (0.10).	425.00	4.90	2,082.50	Billable
2/27/2017 214923	Anna Gooding WORK Update master translation tracking list with recent translations (0.80); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); format and finalize translations per request of S. Kim-Helms (1.00).	155.00	3.00	465.00	Billable
2/27/2017 214940	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.60); review certified translations for formatting accuracy (1.00); format Excel documents into PDF format to be finalized (1.00), email correspondence with translation company regarding the same (0.60); finalizing translations per request of S. Kim-Helms (0.20).	155.00	3.80	589.00	Billable
2/28/2017 214925	Anna Gooding WORK Update master translation tracking list with recent translations (1.20); email correspondence with translation company regarding revisions to translations (0.20); review certified translations for formatting accuracy (1.00); format and finalize translations per request of S. Kim-Helms (1.00).	155.00	3.40	527.00	Billable
2/28/2017 214941	Elizabeth Miorin WORK Update master translation tracking list with recent translations (0.40); email correspondence with translation company regarding revisions to translations (0.60); review certified translations for formatting accuracy (0.60); format Excel documents into PDF format to be finalized (1.00); format foreign original Excel into PDF format (1.00); finalizing translations per request of S. Kim-Helms (0.20).	155.00	3.80	589.00	Billable
2/28/2017 214943	Shinae Kim-Helms WORK Review e-mails between Consortra and A. Gooding/ E. Miorin to finalize outstanding translations requested for Aoki deposition (0.30); prepare draft translation of document requested for rush translation for Aoki deposition (1.50); e-mails with Consortra regarding status of said outstanding files (0.20).	425.00	2.00	850.00	Billable

244/Ion Batteries(7): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Total: WORK			4879.70		$1,510,786.50
TOTAL	Billable Fees		4879.70		$1,510,786.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$1,510,786.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$1,510,786.50
Total New Balance		$1,510,786.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
AG	155.00	382.90	$59,349.50	$59,349.50	0.00
AG	145.00	262.70	$38,091.50	$38,091.50	0.00
CH	145.00	0.20	$29.00	$29.00	0.00
CV	300.00	3.50	$1,050.00	$1,050.00	0.00
EM	155.00	120.40	$18,662.00	$18,662.00	0.00
MD	145.00	4.30	$623.50	$623.50	0.00
NC	350.00	45.00	$15,750.00	$15,750.00	0.00
RN	155.00	538.80	$83,514.00	$83,514.00	0.00
RN	145.00	691.60	$100,282.00	$100,282.00	0.00
SK	425.00	2693.90	$1,144,907.50	$1,144,907.50	0.00
SK	385.00	22.50	$8,662.50	$8,662.50	0.00
TMP	350.00	113.90	$39,865.00	$39,865.00	0.00

Nickname 244/Ion Batteries(8) | Briefs/Motions
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Activity: WORK					
6/20/2013 191279	Christopher Le WORK Contacted local counsel regarding [redacted] with upcoming the amended complaint filing (0.20); email exchanged with M. Muecke regarding the same (0.20); conference with T. Battin regarding the same (0.10).	350.00	0.50	175.00	Billable
6/21/2013 191282	Christopher Le WORK [redacted]	350.00	0.20	70.00	Billable
6/24/2013 191287	Christopher Le WORK [redacted] (0.40); conference with T. Palumbo regarding the same (0.10).	350.00	0.50	175.00	Billable
9/27/2013 193257	Christopher Le WORK [redacted] (0.30); [redacted] (0.10).	350.00	0.40	140.00	Billable
10/4/2013 193479	Christopher Le WORK Reviewed email from M. Day regarding case status (0.10); [redacted] (0.40).	350.00	0.50	175.00	Billable
11/1/2013 215566	Timothy D. Battin WORK Review docket and issues related to motion to dismiss (0.30); review opposition brief (0.40).	695.00	0.30	208.50	Billable
5/2/2014 196898	Christopher Le WORK Reviewed email from Jon King regarding drafting assignment for Sony's motion to dismiss based on failure to state a claim (0.20); began reviewing materials in connection to the same (0.30).	425.00	0.50	212.50	Billable
5/6/2014 197312	Timothy D. Battin WORK Research and analysis relating to price exchanges and anticompetitive effects review and analysis of Sony entities motion to dismiss (1.10); exchange emails with S. Dinner and C. Le regarding same (0.40); draft sections dealing with competitor price exchange information (1.50).	725.00	3.00	2,175.00	Billable
5/6/2014 197406	Christopher Le WORK Reviewed email from J. King regarding batteries opposition drafting assignment (0.10); reviewed materials related to opposition (0.80).	425.00	0.90	382.50	Billable
5/6/2014 197437	Megan Day WORK Locate, organize, print and bind motion to dismiss materials per the request of C. Le and T. Battin.	145.00	1.30	188.50	Billable
5/7/2014 197408	Christopher Le WORK Reviewed prior Sony motion to dismiss briefing, DPP second amended complaint, IPP second amended complaint, court orders and other materials in order to prepare opposition to Sony's motion to dismiss (4.00); outlined arguments and began drafting response to the same (1.80); conference with S. Dinner and N. Cihlar regarding the same (0.20); worked with S. Kim Helms to identify possible connections between Sony subsidiaries and other co-conspirators (1.50).	425.00	7.50	3,187.50	Billable
5/7/2014 197436	Casey Hare WORK Print and bind case materials for review per request of C. Le for use for opposition to motion to dismiss.	145.00	1.50	217.50	Billable

244/Ion Batteries(8): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/7/2014 197440	Scott Dinner WORK Confer with C. Le regarding SEND and SELs motion to dismiss (0.50); research [redacted] for the response brief to SEND and SELs motion to dismiss (3.50); draft [redacted] section of the response brief (2.00).	275.00	6.00	1,650.00	Billable
5/7/2014 197443	Shinae Kim-Helms WORK E-mails with C. Le regarding preparing response to Sony's motion to dismiss (0.40); teleconference with N. Cihlar regarding same (0.20); review Sony's motion to dismiss for factual representations and issues (0.40).	425.00	1.00	425.00	Billable
5/8/2014 197412	Christopher Le WORK Email exchanges with S. Kim-Helms regarding corporate structure of the subsidiaries and timing for personal movements (0.50); organized factual allegations and analyzed the same (1.00); continued drafting opposition (1.30); conferences with S. Dinner regarding issues related to alter ego arguments; conducted research in connection to the same (1.50).	425.00	4.30	1,827.50	Billable
5/8/2014 197444	Shinae Kim-Helms WORK Review hot document chart for documents cited in Sony's MTD (1.10); teleconference with N. Cihlar regarding same (0.20); search for documents cited in Sony's MTD in Catalyst database (0.40); review and analyze said documents (0.20); review and revise response to Sony's MTD (0.20); e-mails with C. Le regarding same (0.20); teleconference with C. Le to discuss outstanding issues in drafting response to Sony's MTD (0.20); search documents in Catalyst data accordingly (0.40); review and analyze key terms list prepared by R. Spiegel (0.40); e-mails with N. Cihlar regarding same (0.20).	425.00	3.50	1,487.50	Billable
5/8/2014 197572	Scott Dinner WORK Draft portions of agency and veil piercing section of the response brief and confer with C. Le regarding same.	275.00	4.00	1,100.00	Billable
5/9/2014 197414	Christopher Le WORK Drafted sections on each subsidiarys role in the conspiracy for opposition to motion to dismiss (3.90); email exchanges with S. Kim-Helms regarding confirmation of public information regarding unified front (1.00).	425.00	4.90	2,082.50	Billable
5/9/2014 197446	Shinae Kim-Helms WORK E-mails with C. Le regarding factual allegations and support for response to Sony's MTD (0.30); review draft Sony's MTD (0.50); conduct research for relevant facts (1.20).	425.00	2.00	850.00	Billable
5/12/2014 197416	Christopher Le WORK Completed drafting argument against Sony electronics and began preparing arguments against Sony Energy devices for opposition to motion to dismiss (2.10); reviewed corporate websites, documents cited in the complaints, and cases in connection to the same (2.10); email exchange with S. Kim-Helms regarding [redacted] (0.80); conference with T. Battin regarding issues related to the same (0.50).	425.00	5.50	2,337.50	Billable
5/12/2014 197447	Shinae Kim-Helms WORK E-mails with C. Le regarding factual allegations for response to Sony's MTD and related researches (0.40); conduct researches (0.50); review and analyze IPPs and DPPs Second Amended Complaint accordingly (0.50); draft factual allegations to be added to response to Sony's MTD (0.50); review and revise draft response to Sony's MTD (0.60).	425.00	2.50	1,062.50	Billable
5/13/2014 197330	Timothy D. Battin WORK Review and revise brief in opposition to motion to dismiss (1.20); research relating to [redacted] (0.60); review materials related to actual participation and relevant pleadings (0.40); conferences with C. Le regarding revisions to brief (0.30).	725.00	2.50	1,812.50	Billable

244/Ion Batteries(8): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/13/2014 197420	Christopher Le WORK Email exchanges with S. Kim-Helms regarding factual allegations against SEL [redacted] (0.80); teleconference with S. Kim-Helms regarding issues related to the same (0.20); worked on drafting section of opposition on SEL (3.20); conference with T. Battin regarding issues related to the same (0.50); reviewed T. Battins comments and edits and revised draft (0.80).	425.00	5.50	2,337.50	Billable
5/14/2014 197333	Timothy D. Battin WORK Review and revise opposition to motion to dismiss (1.80); conferences with C. Le regarding same (0.20).	725.00	2.00	1,450.00	Billable
5/14/2014 197422	Christopher Le WORK Continued working on draft of the opposition to Sony's motion to dismiss; conducted research [redacted] (4.40); conferences with T. Battin and T. Palumbo regarding revisions to the draft (1.50); revised various sections and incorporated edits from T. Battin and T. Palumbo (0.80); email exchanges with S. Kim-helms regarding factual support for various allegation and statements (0.50).	425.00	7.20	3,060.00	Billable
5/14/2014 197455	Shinae Kim-Helms WORK E-mails with C. Le regarding [redacted] (0.40); conduct research on related issues accordingly (1.00); translate Sony Corp.s press release in Japanese language (0.40); prepare supporting allegations to be added to response to Sony's Motion to dismiss (0.90).	425.00	2.70	1,147.50	Billable
7/9/2015 215413	Richard Noh WORK Conference call with S. Kim-Helms regarding motion for summary judgment (0.20); organize attachments to declarations in support of Defendants motion for summary judgment (0.30).	145.00	0.50	72.50	Billable
7/10/2015 215414	Richard Noh WORK Organize attachments to declarations in support of Defendants motion for summary judgment.	145.00	1.00	145.00	Billable
7/13/2015 215415	Richard Noh WORK Organize attachments to declarations in support of Defendants motion for summary judgment.	145.00	2.00	290.00	Billable
7/14/2015 215416	Richard Noh WORK Organize attachments to declarations in support of Defendants motion for summary judgment (1.90).	145.00	1.90	275.50	Billable
Total: WORK			76.10		$30,720.00
TOTAL	Billable Fees		76.10		$30,720.00
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$30,720.00
Total of Costs (Expense Charges)		$0.00
Total new charges		$30,720.00
Total New Balance		$30,720.00

244/Ion Batteries(8): (continued)

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
CH	145.00	1.50	$217.50	$217.50	0.00
CL	425.00	36.30	$15,427.50	$15,427.50	0.00
CL	350.00	2.10	$735.00	$735.00	0.00
MD	145.00	1.30	$188.50	$188.50	0.00
RN	145.00	5.40	$783.00	$783.00	0.00
SD	275.00	10.00	$2,750.00	$2,750.00	0.00
SK	425.00	11.70	$4,972.50	$4,972.50	0.00
TDB	725.00	7.50	$5,437.50	$5,437.50	0.00
TDB	695.00	0.30	$208.50	$208.50	0.00

Nickname 244/Ion Battery (11) | Strategy/Mgmt
Full Name
In Ref To

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
Activity: WORK					
9/11/2013 193278	Timothy D. Battin WORK Teleconference with S. Williams regarding case status and issues related to motion to dismiss briefing (0.20); review pending orders and issues related to motion to dismiss (0.20); conferences with N. Cihlar and C. Le regarding case status (0.10).	695.00	0.50	347.50	Billable
11/1/2013 193725	Timothy D. Battin WORK Teleconference with S. Williams regarding opposition filing, case status, and other issues (0.30).	695.00	0.30	208.50	Billable
2/11/2014 195572	Shinae Kim-Helms WORK Confer with N. Cihlar regarding case status including complaint amendment (0.20); teleconference with R. Spiegel and N. Cihlar regarding status of discover (0.10); review email from N. Cihlar to T. Battin regarding same (0.20).	385.00	0.50	192.50	Billable
2/11/2014 195644	Nathan Cihlar WORK Teleconference and emails with R. Spiegel regarding case management issues including factual issues related to amending complaint and strategy of document review related to the same (0.40); exchange emails with T. Battin regarding same (0.10).	495.00	0.50	247.50	Billable
2/11/2014 195655	Timothy D. Battin WORK Exchange emails with N. Cihlar and S. Kim Helms regarding discovery and management of document review procedures and related responsibilities.	695.00	0.20	139.00	Billable
2/12/2014 195574	Shinae Kim-Helms WORK Review correspondence from co-counsel to steering committee (0.20); e-mails with T. Battin and N. Cihlar regarding same (0.10).	385.00	0.30	115.50	Billable
2/12/2014 195648	Nathan Cihlar WORK Review letter from co-lead counsel regarding status, case management and amended complaint issues and assignments (0.10); teleconference with T. Battin regarding same (0.10).	495.00	0.20	99.00	Billable
2/12/2014 195656	Timothy D. Battin WORK Exchange emails with lead counsel regarding discovery issues (0.30); exchange emails with N. Cihlar and S. Kim-Helms regarding foreign language document review (0.30)	695.00	0.60	417.00	Billable
2/14/2014 195577	Shinae Kim-Helms WORK E-mails with R. Spiegel and L. Chan regarding status of document production (0.20); teleconference with L. Chan regarding status of complaint amendment and related issues (0.40); review reference documents forwarded by L. Chan (0.90).	385.00	1.50	577.50	Billable
2/19/2014 195582	Shinae Kim-Helms WORK Review background materials and issue outlines forwarded by R. Spiegel (0.70); teleconference with R. Spiegel, L. Chan, and H. Rim regarding search strategy and discovery/production related issues (0.40); e-mails with R. Spiegel, L. Chan and H. Rim regarding Catalyst training session (0.40).	385.00	1.50	577.50	Billable
2/24/2014 195588	Shinae Kim-Helms WORK E-mails with R. Spiegel regarding additions and revisions to be made to background materials for document reviewers (0.20); prepare revisions to said documents (0.30).	385.00	0.50	192.50	Billable
2/25/2014 195625	Nathan Cihlar WORK Emails with R. Spiegel regarding status of document review for drafting amended complaint (0.20); emails from J. Verducci and R. Spiegel regarding document review preparations and manage set-up (0.10); review and sign protective order (0.10); emails with J. Schmitt regarding Catalyst set-up for	495.00	1.20	594.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	review (0.20); initiate same on computer in preparation for training call (0.30); review and analysis of documents provided by R. Spiegel and assist in preparing for initial training call (0.30).				
2/26/2014 195628	Nathan Cihlar WORK Review and analysis of training materials, issues for amended complaint and recent pleadings and order to help R. Spiegel manage training call (0.50); participate in Catalyst training to manage issues related to establishing foreign review parameters and overall initial review of documents for allegations in amended complaint (0.40); participate in substantive training call for foreign review/Japanese review training per R. Spiegel (0.50); emails with J. Schmitt regarding additional training on high level search techniques on Catalyst (0.20); teleconference with R. Spiegel regarding management issues related to document review, and specific issues and designing searches to conduct for support of allegations in amended complaint (0.70); review and analysis of coding materials and develop strategies for best results (0.30).	495.00	2.60	1,287.00	Billable
2/27/2014 195634	Nathan Cihlar WORK Teleconference with Catalyst employees regarding training on search capabilities (0.30); teleconference with R. Spiegel and English reviewers regarding substantive issues and management of catalyst review (0.50); review and analysis of additional case management issues regarding document review and design cast of characters memos (0.90).	495.00	1.70	841.50	Billable
3/3/2014 195640	Nathan Cihlar WORK Analysis of potential search strategies for finding additional documents for amended complaint (0.40); teleconference with S. Kim-Helms regarding management of foreign team conducting the same (0.10).	550.00	0.50	275.00	Billable
3/4/2014 215570	Nathan Cihlar WORK Draft table outlining pertinent issues for the amended complaint (1.50); teleconference with R. Spiegel regarding strategy and best evidence for same (0.20); teleconferences with S. Kim-Helms regarding search techniques for identifying additional evidence (0.30).	550.00	2.00	1,100.00	Billable
3/5/2014 215571	Nathan Cihlar WORK Draft table outlining pertinent issues for the amended complaint with a focus on the U.S. subsidiaries roles in preparation for management of document review (1.00); outline hot docs in emails to R. Spiegel for use in coding manual (0.40); email correspondences regarding same (0.10).	550.00	1.50	825.00	Billable
3/6/2014 196214	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding potential search strategies for locating documents for use in amended complaint and management issues related to foreign document review.	550.00	0.20	110.00	Billable
3/7/2014 215572	Nathan Cihlar WORK E-mails with R. Spiegel regarding management of foreign document review strategy for continued searches, QC review and method to best identify docs for amended complaint.	550.00	0.40	220.00	Billable
3/12/2014 196223	Nathan Cihlar WORK Emails with R. Spiegel, L. Chan and S. Kim-Helms regarding management of document review, potential searches, hot documents, coding procedures (0.40); analysis of updated issue outline circulated by R. Spiegel (0.90).	550.00	1.30	715.00	Billable
3/13/2014 215574	Nathan Cihlar WORK Emails with R. Spiegel, L. Chan and S. Kim-Helms regarding management of foreign document review potential searches, hot documents (0.40); analysis of updated issue outline circulated by R. Spiegel (0.30).	550.00	0.70	385.00	Billable
3/14/2014 196229	Nathan Cihlar WORK Teleconference among document review leadership regarding compilation of best material for amended complaint, management of documents related to same (1.00); analysis and formulation of proposed memo/chart and protocol for outlining hot documents for amended complaint (0.40); email	550.00	1.50	825.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	updated draft to R. Spiegel (0.10).				
3/26/2014 196246	Nathan Cihlar WORK Teleconference with R. Spiegel regarding edits to amended complaint and issues related to translations cited in complaint (0.30); draft emails to R. Spiegel regarding comments/suggestions for complaint edits, FNs (0.40); emails with R. Spiegel regarding finalization of document review for use in complaint (0.30).	550.00	1.00	550.00	Billable
3/27/2014 196249	Nathan Cihlar WORK Emails with R. Spiegel regarding strategy, case status, document review protocol and quality control assignment (0.20); teleconference with S. Kim-Helms regarding same (0.10).	550.00	0.30	165.00	Billable
3/28/2014 196251	Nathan Cihlar WORK Begin QC review project per R. Spiegel by gathering and compiling quantitative statistics (1.50); emails with S. Kim-Helms regarding same (0.20).	550.00	1.70	935.00	Billable
3/31/2014 196253	Nathan Cihlar WORK Management of document review protocol with R. Spiegel and draft/edit memo per R. Spiegel regarding review of Catalyst coding by outlining hot documents and summaries, QC of reviewers (1.80); emails with S. Kim-Helms regarding same (0.20).	550.00	2.00	1,100.00	Billable
4/1/2014 196902	Nathan Cihlar WORK Management of document review search teams and protocol with R. Spiegel and draft/edit memo per R. Spiegel regarding review of Catalyst coding by outlining hot documents and summaries, QC of reviewers (4.30); e-mails with S. Kim-Helms regarding same (0.20).	550.00	4.50	2,475.00	Billable
4/2/2014 196906	Nathan Cihlar WORK Draft/edit memo per R. Spiegel regarding review of Catalyst coding by outlining hot documents and summaries, QC of reviewers for continued management of review (3.20); e-mails with S. Kim-Helms regarding same (0.30).	550.00	3.50	1,925.00	Billable
4/3/2014 196908	Nathan Cihlar WORK Management of foreign review team and establishing document review (1.00) draft/edit memo per R. Spiegel regarding review of Catalyst coding by outlining hot documents and summaries, QC of reviewers (2.60); circulate final draft to R. Spiegel and L. Chan (0.10).	550.00	3.70	2,035.00	Billable
4/7/2014 196914	Nathan Cihlar WORK Teleconference and emails with R. Spiegel regarding management and drafting of coding manual (0.20); draft section for coding manual on pass through (1.20); edit coding manual and provide comments to R. Spiegel (1.00); review and analysis of hot document samples for use with coding manual (2.20); identify examples for corresponding lead issues in coding manual (1.00); draft example summaries related to the same (0.60).	550.00	6.20	3,410.00	Billable
4/8/2014 196916	Nathan Cihlar WORK Emails with R. Spiegel regarding coding manual, examples (0.30); edit coding manual and provide comments to R. Spiegel (1.00); review and analysis of hot document samples for use with coding manual (1.60); identify examples for corresponding lead issues in coding manual (0.90); draft example summaries related to the same (0.70).	550.00	4.50	2,475.00	Billable
4/30/2014 197191	Nathan Cihlar WORK Teleconference with R. Spiegel regarding status of coordination, establishment of document review, strategy, coding manual (0.50); review and provide edits/comments to coding manual (0.70).	550.00	1.20	660.00	Billable
5/2/2014 197448	Nathan Cihlar WORK Review/edit coding manual per R. Spiegel for management of foreign review.	550.00	1.00	550.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
5/7/2014 197449	Nathan Cihlar WORK Review, analysis and edits to coding manual (1.30); draft email memo with suggested edits and circulate to R. Spiegel (1.00).	550.00	2.30	1,265.00	Billable
5/8/2014 197450	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding coding manual, key term chart (0.30); work on drafting additions to the key term chart for management of document review (1.00).	550.00	1.30	715.00	Billable
5/9/2014 197451	Nathan Cihlar WORK Analysis of draft translation protocol exemplar (0.30); circulate to R. Spiegel (0.10).	550.00	0.40	220.00	Billable
5/14/2014 197452	Nathan Cihlar WORK Teleconference and emails with R. Spiegel regarding management issues with review team and potential review protocol issues.	550.00	0.40	220.00	Billable
5/29/2014 197453	Nathan Cihlar WORK Teleconference with document review leadership group regarding procedures, Catalyst, coding issues, team dynamics, reviewer teams (1.50); emails with R. Spiegel regarding same (0.20); analyze latest draft master cast of characters, coding manual, key terms in preparation for training calls (0.50).	550.00	2.20	1,210.00	Billable
6/2/2014 198068	Nathan Cihlar WORK Emails with R. Spiegel regarding document review, management and coordination issues with DPPs.	550.00	0.40	220.00	Billable
6/3/2014 198071	Nathan Cihlar WORK Emails with D. Lambrinos regarding translation issues and protocol and initial review of potential certification companies.	550.00	0.20	110.00	Billable
6/4/2014 198072	Nathan Cihlar WORK Teleconference with R. Spiegel regarding search terms, coding manual (0.60); teleconference with J. Schmitt and training on Catalyst (0.80); emails with R. Spiegel regarding need to QC and to answer reviewers questions on the system (0.60).	550.00	2.00	1,100.00	Billable
6/5/2014 198074	Nathan Cihlar WORK Management of document team and field and respond to questions from reviewers coding documents on Catalyst (1.50); emails with J. Schmitt, R. Spiegel regarding issues with the coding system, fields (0.70).	550.00	2.20	1,210.00	Billable
6/6/2014 215457	Nathan Cihlar WORK Teleconference with document review team regarding leading issues of foreign translation team including D. Lambrinos, R. Spiegel, L. Chan regarding issues with translations, certifications, objections to translations.	550.00	1.20	660.00	Billable
6/9/2014 198081	Nathan Cihlar WORK Teleconference with DPPs/IPPs regarding translation coordination, certification companies (1.00); continue to field and respond to various questions from coding reviewers (0.40).	550.00	1.40	770.00	Billable
6/10/2014 198088	Nathan Cihlar WORK Emails with R. Spiegel regarding coding, quality control and conversion and coordination of coding from previous document reviews (1.30); work in Catalyst for T2 coding and conversion of hot documents (2.50); continue receiving and responding to various substantive review questions from coding team (1.00); teleconference with J. Schmitt and R. Spiegel regarding coding fields and potential edits to the same (0.70).	550.00	5.50	3,025.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/11/2014 198091	Nathan Cihlar WORK Analysis, redline edits to translation protocol (1.50); meetings with T. Palumbo regarding same (0.20); emails same to R. Spiegel (0.20); field questions related to document review (0.40).	550.00	2.30	1,265.00	Billable
6/12/2014 198092	Nathan Cihlar WORK Field and respond to questions from reviewers coding documents on Catalyst (0.60); T2 coding and quality control review on Catalyst (1.00); emails with R. Spiegel regarding translation protocol (0.30); teleconference with J. Schmitt regarding Catalyst issues (0.20).	550.00	2.10	1,155.00	Billable
6/13/2014 198095	Nathan Cihlar WORK Document review management and review and respond to document reviewers substantive questions.	550.00	0.30	165.00	Billable
6/16/2014 198098	Nathan Cihlar WORK Review documents identified as hot in previous review and draft full summaries and code issues in Catalyst (1.50); quality control of reviewers and answer substantive questions from reviewers (0.50); emails with Spiegel regarding translation protocol and omnibus template for tracking the same (0.50).	550.00	2.50	1,375.00	Billable
6/18/2014 198083	Nathan Cihlar WORK Document review management and field and respond to substantive questions from document reviewers.	550.00	0.70	385.00	Billable
6/23/2014 198084	Nathan Cihlar WORK Document review management and field and respond to substantive questions from document reviewers (0.60); quality control and review of coding by T1 reviewers (0.70).	550.00	1.30	715.00	Billable
6/24/2014 198085	Nathan Cihlar WORK QC review of documents identified as hot in previous review and draft full summaries and code issues in Catalyst (0.50), teleconference with J. Schmitt regarding coding issues and saving concerns in Catalyst (0.30); field and respond to substantive questions from document reviewers (0.60).	550.00	1.40	770.00	Billable
6/30/2014 198086	Nathan Cihlar WORK Review, edit and redline latest draft of IPP/DPP protocol with DPP comments (1.00); analysis of coding panel and review emails from R. Spiegel regarding different issue codes and potential folder system in Catalyst (0.50).	550.00	1.50	825.00	Billable
7/2/2014 198675	Nathan Cihlar WORK Emails and teleconference with D. Lambrinos regarding status of assignments, document review, translation issues (0.20); emails with R. Spiegel regarding status of document review, logistical issues (0.20).	550.00	0.40	220.00	Billable
7/8/2014 198680	Nathan Cihlar WORK Teleconference among document review leadership team to discuss ongoing projects, quality control issues (0.40); teleconference with S. Kim-Helms regarding quality control review project of English reviewers (0.30); propose/edit potential issues with coding panel (0.50).	550.00	1.20	660.00	Billable
7/9/2014 198764	Nathan Cihlar WORK Emails with R. Spiegel regarding document review management strategy, QC and answers to T1 coding questions.	550.00	0.30	165.00	Billable
7/18/2014 198777	Nathan Cihlar WORK Email exchange with R. Spiegel regarding working strategy list for document review assignments (0.20); review and analysis of QC project assigned by R. Spiegel (0.40); teleconference with S.	550.00	1.50	825.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Kim-Helms regarding same and to discuss strategy for running QC report (0.20); analysis of initial report by Kim-Helms outlining production of English review team (0.70).				
7/28/2014 198785	Nathan Cihlar WORK Review and analysis of QC chart developed by S. Kim-Helms and provide edits to the same (1.20); manage and analysis of production from various reviewers and QC same (0.30).	550.00	1.50	825.00	Billable
7/29/2014 198786	Nathan Cihlar WORK Teleconference with S. Kim-Helms to discuss management of foreign review team and proposed edits to QC chart and strategy for completion of the same (0.30); analysis and QC of T1 review to date (0.20).	550.00	0.50	275.00	Billable
7/31/2014 199241	Nathan Cihlar WORK Manage document review and answer substantive questions from reviewers for document review on Catalyst.	550.00	0.50	275.00	Billable
8/4/2014 199244	Nathan Cihlar WORK Manage document review and answer substantive questions from reviewers for document review on Catalyst.	550.00	0.50	275.00	Billable
8/5/2014 199307	Nathan Cihlar WORK Manage document review and answer substantive questions from reviewers for document review on Catalyst.	550.00	0.50	275.00	Billable
8/6/2014 199200	Nathan Cihlar WORK Teleconference with R. Spiegel regarding management of ongoing document review protocol, translation issues, Consortra contract and other strategy issues.	550.00	0.80	440.00	Billable
8/7/2014 199201	Nathan Cihlar WORK Teleconference with lead document review attorney group regarding ongoing issues with document review and translations (1.00); analysis of QC report and discuss same with S. Kim-Helms (0.40); emails with R. Spiegel regarding T1 review logistic issues (0.20); meeting with T. Palumbo regarding draft of master translation tracking chart (0.30); review, analysis and edit Consortra pricing procedure (0.20); meeting with T. Palumbo to discuss the same (0.10).	550.00	2.20	1,210.00	Billable
8/7/2014 215394	Thomas M. Palumbo WORK Review and analyze certified translation company pricing proposal (1.00); email correspondence with N. Cihlar and S. Kim-Helms regarding negotiating changes to terms of same (0.20); review and analyze translation materials and correspondence regarding same (0.10); organize case files with same (0.10); begin drafting master translation tracking chart and conferences with R. Noh regarding same (1.10).	425.00	2.50	1,062.50	Billable
8/11/2014 215395	Thomas M. Palumbo WORK Review draft contract with translation company, prepare comments and revisions to same.	425.00	0.50	212.50	Billable
8/12/2014 199202	Nathan Cihlar WORK Analysis of Consortra proposed contract for translation, vending services (0.30); edit and propose changes to content (0.30); circulate same to R. Spiegel, L. Chan and H. Rim (0.10); review/edit translation tracking chart (0.60); meetings with T. Palumbo regarding same (0.10); emails with R. Spiegel/C. Lovell regarding SDI documents translated and corrected (0.50).	550.00	1.90	1,045.00	Billable
8/14/2014 199203	Nathan Cihlar WORK Teleconference with document review leadership group regarding procedural, substantive issues with review (0.80); analysis/ propose edits to coding manual (1.20); teleconference with entire document review team regarding coding issues, substantive issue review (1.00).	550.00	3.00	1,650.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
8/19/2014 199204	Nathan Cihlar WORK Emails with H. Rim and R. Spiegel regarding coding procedures and protocol issues (0.30); emails with R. Perez regarding questions on substantive coding (0.40); meetings with T. Palumbo regarding translation tracking chart and coordination issues with DPPs (0.10); edits to the same (0.20).	550.00	1.00	550.00	Billable
8/20/2014 199205	Nathan Cihlar WORK Manage document review and field and answer questions from T1 English reviewers re: substantive issues and coding procedures.	550.00	0.60	330.00	Billable
8/21/2014 199206	Nathan Cihlar WORK Teleconference with R. Spiegel to review status of management of document review, coding procedures, translation issues (0.30); teleconference with S. Kim-Helms regarding ongoing QC issues (0.20).	550.00	0.50	275.00	Billable
8/25/2014 199186	Thomas M. Palumbo WORK Teleconference with N. Cihlar and S. Kim-Helms regarding translation protocol, processes and other organization related issues (0.20); teleconference with V. Glaze regarding translation coordination and other related issues (0.20); review correspondence and translation materials from co-counsel (0.10); review and revise master translation tracking chart (0.80); prepare and revise draft correspondence routing same, conferences with N. Cihlar regarding same (0.20); conferences with staff regarding translation process, organization of materials and other document management related issues (0.70); review and analyze draft master translation chart (0.70); conferences with R. Noh regarding issues regarding same (0.10).	425.00	3.00	1,275.00	Billable
8/25/2014 215575	Nathan Cihlar WORK Email correspondence with S. Nagawa, H. Rim. R. Spiegel and L. Chan regarding informal translation tracking assignment and strategy for managing the same (0.40); meetings with T. Palumbo and R. Noh regarding coordination and tracking procedures for foreign document translations (0.50).	550.00	0.50	275.00	Billable
8/26/2014 199208	Nathan Cihlar WORK Email correspondence with R. Spiegel, L. Chan, H. Rim regarding management procedures for requesting informal translation, coordination issues with DPPs on tracking and certified translation requests (0.50).	550.00	0.50	275.00	Billable
8/26/2014 215397	Thomas M. Palumbo WORK Review materials requested for translation by Japanese review team and correspondence regarding same (1.00); conferences with N. Cihlar regarding same (0.10); review and revise related correspondence regarding same (0.20); conference with N. Cihlar regarding coordination of translations with co-Plaintiff groups, draft correspondence addressing certain issues regarding same (0.20).	425.00	1.50	637.50	Billable
8/28/2014 199209	Nathan Cihlar WORK Teleconference with other team leaders' of document review to review coding procedures, substantive document concerns and other strategy issues (0.60); identify documents for translation by S. Nagawa (0.30); emails with H. Rim, S. Nagawa regarding translation assignment and strategy for managing the same (0.10).	550.00	1.00	550.00	Billable
8/28/2014 199217	Thomas M. Palumbo WORK Review correspondence from N. Cihlar outlining various projects regarding translation management and other related issues (0.20); locate materials pertaining to same, review and analyze related materials(0.20); conferences with N. Cihlar regarding related issues(0.10).	425.00	0.50	212.50	Billable
9/2/2014 199518	Nathan Cihlar WORK Draft translation protocol memorandum for IPP attorneys outlining protocol for use, requests, process for translations.	550.00	1.80	990.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
9/2/2014 199585	Thomas M. Palumbo WORK Conferences with N. Cihlar regarding memorandum detailing translation protocol and procedures (0.10); draft, review and revise draft protocol memorandum (0.60); locate and analyze related materials (1.00); conference with N. Cihlar regarding coordination of translation uploads with Catalyst and other related issues(0.30).	425.00	2.00	850.00	Billable
9/3/2014 199521	Nathan Cihlar WORK Review issues of coordination between DPPs and IPPs with respect to foreign documents, informal translation and translation protocol (1.50); draft/edit translation tracking chart (0.70); meetings with T. Palumbo regarding same (0.10); review notes from call with V. Glaze outlining coordination concerns (0.20); draft email outlining coordination issues with DPPs to R. Spiegel, D. Lambrinos, Q. Lin and others (0.50); analysis of memorandum circulated by J. Verducci outlining top documents from reviewers for QC review (1.50).	550.00	4.50	2,475.00	Billable
9/3/2014 199587	Thomas M. Palumbo WORK Teleconference with V. Glaze regarding translation related issues(0.20); conference with N. Cihlar regarding same (0.10); prepare draft correspondence regarding related issues to N. Cihlar (0.20); review and analyze certain translation and foreign parent materials (1.00); email correspondence with S. Nagano and H. Rim regarding related issues (0.10); organize and update translation tracking materials (0.40); draft, review and revise translation protocol and process memorandum (0.40); conferences with N. Cihlar regarding same (0.10).	425.00	2.50	1,062.50	Billable
9/4/2014 199523	Nathan Cihlar WORK Teleconference among lead document review attorney group regarding ongoing issues with document review and translations (0.50); analysis of J. Verducci chart related to QC issues and T1 review to date (0.30); continue review/draft of translation protocol memorandum for IPP attorneys (0.70).	550.00	1.50	825.00	Billable
9/4/2014 199591	Thomas M. Palumbo WORK Email correspondence with J. LaMorgese regarding catalyst translation protocol and related issues.	425.00	0.50	212.50	Billable
9/8/2014 199528	Nathan Cihlar WORK Finalize draft internal IPP translation protocol (1.60); meetings with T. Palumbo regarding same (0.40); circulate same to leadership team L. Chan, D. Lambrinos, R. Spiegel, H Chu (0.20).	550.00	2.20	1,210.00	Billable
9/9/2014 199530	Nathan Cihlar WORK Emails with L. Chan regarding translation protocol memorandum.	550.00	0.20	110.00	Billable
9/9/2014 199597	Thomas M. Palumbo WORK Teleconference with J. LaMorgese regarding catalyst translation uploading and other related protocols (0.20); draft summary correspondence to N. Cihlar regarding same (0.20); adjustments and protocol conference with N. Cihlar regarding same (0.10); email correspondence with V. Glaze regarding translation related issues (0.20).	425.00	0.70	297.50	Billable
9/10/2014 199533	Nathan Cihlar WORK Conduct QC of various T1 reviewers (1.90); draft table outlining issues related to the same (0.80); circulate to document review leadership team (0.30); meetings with T. Palumbo and R. Noh regarding tracking chart and organization of translations completed to date (0.80).	550.00	3.80	2,090.00	Billable
9/15/2014 199537	Nathan Cihlar WORK Teleconference among discovery team leaders regarding ongoing projects, QC results, and other document review issues (0.50); review and analysis of list of key terms circulated to L. Chan (0.60).	550.00	1.10	605.00	Billable
9/22/2014 199745	Christopher Le WORK [redacted]	425.00	0.40	170.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] (0.10); [redacted] (0.10); [redacted] (0.10); [redacted] (0.10).				
9/23/2014 199631	Thomas M. Palumbo WORK Review and revise correspondence regarding translation contract (0.50); conferences with N. Cihlar regarding related issues (0.20); teleconference with V. Glaze regarding translation coordination and management related issues (0.20); email correspondence with J. LaMorgese regarding translation protocol and management of catalyst for related translation issues (0.10).	425.00	1.00	425.00	Billable
9/23/2014 199793	Nathan Cihlar WORK Review and analysis of Consortra contract issues and email from L. Chan regarding same (0.20); draft email outlining issues with subjective wording in contract and circulated to DPPs and L. Chan (0.50); teleconference with R. Spiegel regarding overall document review progress, translation issues, contract with Consortra (0.30).	550.00	1.00	550.00	Billable
9/24/2014 199634	Thomas M. Palumbo WORK Email correspondence with J. LaMorgese regarding catalyst translation protocol related issues.	425.00	0.10	42.50	Billable
9/24/2014 199795	Nathan Cihlar WORK Teleconference among document review leadership team regarding phase two document review and other case management issues.	550.00	0.80	440.00	Billable
9/25/2014 199635	Thomas M. Palumbo WORK Teleconference with J. LaMorgese regarding translation upload process on catalyst and other related issues (0.10); draft, review and revise translation upload instruction form template(0.50); conferences with R. Noh regarding same(0.10).	425.00	0.70	297.50	Billable
9/25/2014 199797	Nathan Cihlar WORK Emails with V. Glaze, DPP counsel, regarding transliteration issues with employee names (0.30); teleconferences with S. Kim-Helms regarding the same (0.20); teleconference with J. LaMorgese regarding translation upload process and other related issues (0.20); edit, review and revise translation upload instruction form template (0.20); conferences with R. Noh regarding same (0.10).	550.00	1.00	550.00	Billable
9/30/2014 199801	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership group regarding resumption of document review and parameters of the same (0.50); review and analyze updated materials (0.20); teleconference with R. Spiegel regarding potential edits to the same (0.30).	550.00	1.00	550.00	Billable
10/2/2014 200355	Nathan Cihlar WORK Emails with R. Spiegel regarding translation upload instructions to Catalyst for inclusion on the system once certified versions finalized (0.40); draft email to R. Spiegel, L. Chan, D. Lambrinos and others regarding translation protocol for Catalyst (0.60); participate in group call regarding management of the document review (0.50).	550.00	1.50	825.00	Billable
10/9/2014 200356	Nathan Cihlar WORK Teleconference with R. Spiegel and among document review leadership group regarding status, QC, production issues, custodian lists, search terms (0.40); update and circulate master chart of translations (0.30).	550.00	0.70	385.00	Billable
10/16/2014 200357	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership group regarding status, QC, production issues, custodian lists, search terms.	550.00	0.50	275.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
10/27/2014 200358	Nathan Cihlar WORK Teleconference with R. Spiegel regarding case status, and management issues related to discovery, translation chart, issues with Consortra contract, Hitachi custodian list.	550.00	0.50	275.00	Billable
10/28/2014 215399	Thomas M. Palumbo WORK Teleconference with V. Glaze of DPPs regarding translation vendor contract and other issues related to coordination.	425.00	0.20	85.00	Billable
10/30/2014 200359	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership group regarding status, QC, production issues, custodian lists, search terms.	550.00	0.50	275.00	Billable
11/8/2014 201593	Nathan Cihlar WORK Analysis of protocol for depositions in case management order per L. Chan (0.30); draft email to L. Chan outlining potential exceptions for deposition locations outside of NDCA (0.20).	550.00	0.50	275.00	Billable
11/9/2014 201595	Nathan Cihlar WORK Analysis of protocol for depositions in case management order per L. Chan (0.20); draft email to L. Cahn outlining best procedures for costs related to interpreters at depositions (0.10).	550.00	0.30	165.00	Billable
11/13/2014 201601	Nathan Cihlar WORK Analysis and edits of worksheet with potential search terms for ongoing document review projects (0.70); analyze and compile additional searches, metadata related to same and edit excel spreadsheet (1.30); teleconference with leadership team re: document review (0.30).	550.00	2.30	1,265.00	Billable
11/18/2014 201607	Nathan Cihlar WORK Teleconference with document review team regarding evidence to date, coding manual (0.40); review and analysis of latest draft contract with Consortra (0.20); email proposed edits of same to L. Chan (0.20); emails with R. Spiegel regarding drafting discovery plan related to translations (0.30).	550.00	1.10	605.00	Billable
11/20/2014 201611	Nathan Cihlar WORK Participate in weekly document review leadership call (0.30); analysis of excel spreadsheet re: custodians, potential search terms (0.20).	550.00	0.50	275.00	Billable
11/21/2014 201613	Nathan Cihlar WORK Draft/edit translation protocol (0.50); emails with R. Spiegel regarding the same (0.20); analysis of procedures for informal translations (0.70); emails with R. Spiegel regarding the same (0.10).	550.00	1.50	825.00	Billable
11/21/2014 201650	Thomas M. Palumbo WORK Review and revise certain portions of proposed discovery and translation protocol (0.30); conferences and email correspondence with N. Cihlar regarding same (0.20).	425.00	0.50	212.50	Billable
11/23/2014 201615	Nathan Cihlar WORK Review/edit excel spreadsheet of LG hot documents potentially needing translation (0.30); identify/rank importance of the same per R. Spiegel (0.50); emails with S. Kim-Helms regarding same (0.20).	550.00	1.00	550.00	Billable
11/24/2014 201618	Nathan Cihlar WORK Emails with V. Glaze, A. Sheanin, R. Spiegel regarding coordination on translation protocol (0.20); review/edit current draft of translation protocol (0.40).	550.00	0.60	330.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/1/2014 201547	Nathan Cihlar WORK Draft translation protocol (1.90); analysis of deposition protocol (0.90); emails with R. Spiegel regarding same (0.20).	550.00	3.00	1,650.00	Billable
12/5/2014 201553	Nathan Cihlar WORK Analysis of Consortra contract and issues related to the same (0.20); email exchange with R. Spiegel, discovery team regarding concerns and suggested edits to the same (0.40).	550.00	0.60	330.00	Billable
12/8/2014 201556	Nathan Cihlar WORK Emails with R. Spiegel regarding edits to translation protocol (0.20); teleconference with R. Spiegel regarding same (0.30).	550.00	0.50	275.00	Billable
12/9/2014 201560	Nathan Cihlar WORK Emails with V. Glaze and R. Spiegel regarding coordination/edits to translation protocol.	550.00	0.30	165.00	Billable
12/11/2014 201563	Nathan Cihlar WORK Draft/edit translation protocol (0.70); teleconference with document review leadership team to discuss strategy, translation issues (0.60).	550.00	1.30	715.00	Billable
12/12/2014 201567	Nathan Cihlar WORK Review, revise updated reviewer manual and coding sheet (1.00); emails with R. Spiegel regarding the same (0.20).	550.00	1.20	660.00	Billable
12/16/2014 201571	Nathan Cihlar WORK Participate in document review conference call led by R. Spiegel (0.40); analysis of LGC organization chart (0.20).	550.00	0.60	330.00	Billable
12/19/2014 201576	Nathan Cihlar WORK Emails and teleconference with R. Spiegel, regarding suggested edits to translation protocol (0.50).	550.00	0.50	275.00	Billable
1/6/2015 202075	Nathan Cihlar WORK Teleconference with R. Spiegel regarding status of document review, final edits to the translation protocol, strategy for review of documents remaining in first batch, coordination issues with DPPs (0.70).	550.00	0.70	385.00	Billable
1/8/2015 202081	Nathan Cihlar WORK Teleconference with document review leadership team to discuss ongoing review strategy and quality control issues (0.20); review and analysis of various potential custodian lists (0.80).	550.00	1.00	550.00	Billable
1/9/2015 202082	Nathan Cihlar WORK Emails with D. Lambrinos regarding translation protocol, request and specifics about translation of Sanyo document for brief (0.20); review/analysis of summary of document identified by D. Lambrinos (0.30); review correspondence from co-counsel regarding translation and analyze status of the same (0.20).	550.00	0.70	385.00	Billable
1/12/2015 215577	Nathan Cihlar WORK Emails with R. Spiegel regarding draft of translation protocol and meet and confer with Defendants regarding the same (0.30); analysis, review and edits to proposed draft changes by Defendants to translation protocol (0.50).	550.00	0.80	440.00	Billable
1/13/2015 202088	Nathan Cihlar WORK Analysis, review and edits to proposed draft changes by Defendants to translation protocol.	550.00	0.80	440.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/15/2015 215411	Nathan Cihlar WORK Analysis, review and edits to proposed draft changes by Defendants to translation protocol (0.60); teleconference with R. Spiegel, L. Chan and leadership team regarding management of document review, translation issues (0.50).	550.00	1.10	605.00	Billable
1/16/2015 202094	Nathan Cihlar WORK Emails with R. Spiegel, S. Scarlett regarding foreign review management issues and informal translation assignment (0.20); coordinate with foreign speaking attorneys regarding translations of transactional data (0.30); emails with L. Chan, R. Spiegel regarding translation assignments (0.10).	550.00	0.60	330.00	Billable
1/20/2015 202098	Nathan Cihlar WORK Teleconference with R. Spiegel regarding translation protocol, edits to the same (0.50); teleconference with A. Sheanin, V. Glaze and other DPPs regarding translation protocol, preparations for meet and confer with Defendants (0.60); draft/propose edits to translation protocol (0.40).	550.00	1.50	825.00	Billable
1/21/2015 202100	Nathan Cihlar WORK Teleconference meet and confer with Defendants, DPPs regarding translation protocol (0.50); teleconference with DPPs regarding proposed draft edits following meet and confer and compromises with Defendants (0.50); draft/edit proposed language related to the same (0.40); teleconference with R. Spiegel regarding translation protocol responses/issues (0.30).	550.00	1.70	935.00	Billable
1/22/2015 202103	Nathan Cihlar WORK Teleconference with R. Spiegel, D. Lambrinos, L. Chan and others regarding document review strategy/pause, management of foreign review team and translation issues and other document coding/review management issues (1.00).	550.00	1.00	550.00	Billable
1/27/2015 202109	Nathan Cihlar WORK Review chart outlining remaining issues for meet and confer with Defendants regarding translation protocol (0.30); analysis of our overall position and draft proposed edits to protocol (0.70).	550.00	1.00	550.00	Billable
1/28/2015 202111	Nathan Cihlar WORK Teleconference with R. Spiegel and DPPs regarding strategy for meet and confer with Defendants and proposed language for translation protocol (0.50); teleconference with R. Spiegel regarding same (0.50); emails with R. Spiegel, A. Sheanin regarding edits/language for translation protocol, issues related to experts review of translations (0.20).	550.00	1.20	660.00	Billable
1/31/2015 202116	Nathan Cihlar WORK Emails with R. Spiegel regarding emails form A. Sheanin/B. Glackin regarding DPP position on translations of documents used by expert in briefs (0.30); draft response/positon regarding same in preparation for meet and confer with Defendants (0.30); teleconference with R. Spiegel regarding same (0.10).	550.00	0.70	385.00	Billable
2/2/2015 202118	Nathan Cihlar WORK Teleconference meet and confer with Defendants regarding proposed edits to translation protocol and other issues related to interpreters/translation companies (1.00); teleconference with R. Spiegel regarding same (0.20).	550.00	1.20	660.00	Billable
2/4/2015 202210	Nathan Cihlar WORK Draft/edit proposed compromise language with Defendants re: translation protocol (0.60); emails with A. Sheanin, R. Spiegel regarding strategy and draft language related to the same (0.20); review/edit proposed draft email from R. Spiegel to Defendants regarding comprised language/edits to translation protocol (0.50).	550.00	1.30	715.00	Billable
2/5/2015 202211	Nathan Cihlar WORK Teleconference with R. Spiegel and document review management team regarding ongoing issues	550.00	0.60	330.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	related to search terms, translation issues, production issues (0.30); outline/prioritize foreign language team translation assignments (0.20); emails with S. Kim-Helms regarding same (0.10).				
2/10/2015 202212	Nathan Cihlar WORK Teleconference with R. Spiegel regarding proposed coordination efforts with DPPs on informal translations, organization and strategy for tracking translations, drafting procedures for the same.	550.00	0.50	275.00	Billable
2/12/2015 202213	Nathan Cihlar WORK Emails with S. Scarlett and R. Spiegel regarding translation data translation requests from experts (0.50); strategize/prioritize same for translation by foreign review team (0.40); teleconference with S. Kim-Helms regarding assignments to foreign review team (0.20); teleconference with document review management team regarding ongoing assignments, strategy (0.20).	550.00	1.30	715.00	Billable
2/17/2015 202214	Nathan Cihlar WORK Review/analysis of completion of informal translations related to transactional data (0.30); meetings with R. Noh regarding tracking of the same (0.10); emails with S. Kim-Helms regarding prioritization of the informal translations (0.10).	550.00	0.50	275.00	Billable
2/18/2015 202215	Nathan Cihlar WORK Emails with S. Scarlett and R. Spiegel regarding translation data translation requests from experts (0.10); strategize/prioritize same for translation by foreign review team (0.20).	550.00	0.30	165.00	Billable
2/19/2015 202216	Nathan Cihlar WORK Teleconference with R. Spiegel regarding translation coordination with DPPs, status of informal translations of transactional data (0.40); updates to translation tracking chart (0.30).	550.00	0.70	385.00	Billable
2/20/2015 202217	Nathan Cihlar WORK Review/analysis of productions Sony/Panasonic related to transactional data (0.50); analyze/prioritize foreign documents needing translations (0.20); emails with foreign review team members regarding strategic assignments related to the same (0.20); teleconference with S. Kim-Helms regarding expert translation requests, edits to formatting of completed informal translations related to same (0.40).	550.00	1.30	715.00	Billable
2/23/2015 202218	Nathan Cihlar WORK Teleconference with R. Spiegel regarding management of ongoing translation assignments, coordination with DPPs (0.50); review/analysis of finalized informal translations to determine strategic value (0.70).	550.00	1.20	660.00	Billable
2/24/2015 202219	Nathan Cihlar WORK Teleconference with V. Glaze and J. Moy regarding coordination on informal and certified translations, strategy for division of work assignments, analysis of productions and translations to date (0.50); emails with J. Moy and V. Glaze regarding strategy/division of work assignments for informal translations (0.70); review and analysis of proposed transactional documents needing translation (0.40); prioritize/strategize with R. Spiegel and S. Kim-Helms regarding priority and assignments (0.50); emails with foreign reviewers regarding questions related to assigned translations (0.30); review translated documents to ensure follow guidelines for translations (0.60).	550.00	3.00	1,650.00	Billable
2/25/2015 202220	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding status of Panasonic informal translations and strategic value assessment of same and to discuss issues re: coordination with DPPs.	550.00	0.20	110.00	Billable
2/26/2015 202221	Nathan Cihlar WORK Meetings with R. Noh regarding translation status/tracking (0.20); review, edit translation tracking	550.00	1.00	550.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	chart for accuracy (0.10); strategize for next assignments for foreign review team related to informal translation of transactional data (0.50); teleconference with document review case management team regarding ongoing issues/assignments, foreign team translations (0.20).				
2/27/2015 202222	Nathan Cihlar WORK Emails with V. Glaze and J. Moy, DPP counsel, regarding coordination issues of translations of transactional data (0.30); review/analyze informal translations by DPPs (0.60); emails with R. Spiegel and S. Kim-Helms regarding foreign search terms (0.50); teleconference with S. Kim-Helms regarding translations requested by experts and assignments to foreign team regarding the same (0.30).	550.00	1.70	935.00	Billable
3/2/2015 202727	Nathan Cihlar WORK Emails with J. Moy, V. Glaze and R. Spiegel regarding coordination on translations, transactional data issues (0.50); teleconference with S. Kim-Helms regarding ongoing assignments of informal translations (0.20); review draft versions of the same (0.50).	550.00	1.20	660.00	Billable
3/4/2015 202728	Nathan Cihlar WORK Emails with J. Moy and V. Glaze regarding coordination/status of informal translations of transactional data (0.70); emails with S. Kim-Helms regarding transactional data draft translations and proposed assignments to foreign reviewers regarding same (0.40).	550.00	1.10	605.00	Billable
3/10/2015 202729	Nathan Cihlar WORK Coordination with lead counsel and DPPs regarding issues related to certified translations and analysis of potential translatoin vendor contracts (0.60); emails with R. Spiegel regarding coordination with DPPs, Park IP translation contract (0.60).	550.00	1.20	660.00	Billable
3/11/2015 202730	Nathan Cihlar WORK Teleconference with V. Glaze, J. Moy and R. Spiegel regarding coordination, status of informal translations, tracking certified translations, contracts with Park and Consortra, newest production related to transactional data (1.00); review and analysis of informal translations (0.20); teleconference with S. Kim-Helms regarding expert requests for translations of transactional data (0.20).	550.00	1.40	770.00	Billable
3/16/2015 202731	Nathan Cihlar WORK Review and analysis of hot document lists, current requests for translations to determine value for IPP position (0.80); emails with R. Spiegel regarding best documents to send for wave 1 to Consortra (0.50); emails with V. Glaze regarding informal translations and coordination on requests for certification related to the same (0.70).	550.00	2.00	1,100.00	Billable
3/18/2015 202732	Nathan Cihlar WORK Emails with V. Glaze of DPPs regarding Sanyo transactional data and coordination on informal translations (0.10); review and analysis of informal translations of transactional data for ensuring info for experts (0.30); circulate finalized versions to DPPs (0.10).	550.00	0.50	275.00	Billable
3/19/2015 202733	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership team regarding ongoing projects in order to lead issues related to translation coordination, platform considerations, overall status and strategy, other document production issues (1.00); review and finalize the glossary of terms to provide certified translation vendors (0.50); coordination with DPPs and analyze whether to include their additions/ suggested terms (0.30); emails with R. Spiegel regarding the same (0.20); review, edit the translation tracking chart for final hot docs to include (0.20); emails with V. Glaze regarding	550.00	2.50	1,375.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	ongoing informal translations of transactional data and coordination on the same (0.10); propose division of labor and assignments related to the same (0.20).				
3/20/2015 202734	Nathan Cihlar WORK Review, comment with proposed issues from contract with Park Translation Co (0.40); review and analyze glossary of terms proposed by DPPs to send to certified translation companies (0.60); teleconference with S. Kim-Helms regarding same (0.30); cross check and compare the informal translations by DPPs/IPPs (0.70).	550.00	2.00	1,100.00	Billable
3/23/2015 202735	Nathan Cihlar WORK Finalize redline edits/comments to contract with Park (0.50); circulate same to R. Spiegel, DPPs (0.10); prepare finalized informal translations to send to Consortra for translation (0.60); meetings with R. Noh regarding same (0.40); teleconference with Consortra regarding proposed assignment, turn-around time, FTP site (0.50).	550.00	2.10	1,155.00	Billable
3/24/2015 202736	Nathan Cihlar WORK Emails with V. Glaze of DPPs regarding FTP site protocol with Consortra.	550.00	0.30	165.00	Billable
3/25/2015 202737	Nathan Cihlar WORK Teleconference with V. Glaze, J. Moy and R. Spiegel regarding coordination on translation issues, certified translation status, other review and production issues (0.60); review issues related to glossary terms for Consortra and emails with V. Glaze regarding same (1.20); emails with V. Glaze regarding consistent terminology for informal translations and edits to proposed final translations (0.40); prepare finalized informal translations to send to Consortra for translation (0.40).	550.00	2.60	1,430.00	Billable
3/26/2015 202738	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership team regarding ongoing projects, translation coordination, platform considerations, overall status and strategy, other document production issues (0.50); teleconference with S. Kim-Helms regarding status of translations of transactional data (0.30); review transactional data informal translations to ensure proper info is being filtered to experts (0.30); analysis and finalize list for lead counsel to use for class cert (0.40).	550.00	1.50	825.00	Billable
3/31/2015 202739	Nathan Cihlar WORK Draft/edit/redline contract with Park Translation Co (2.00); analysis of proposed issues by DPPs and incorporate the same (0.80).	550.00	2.80	1,540.00	Billable
4/1/2015 203094	Nathan Cihlar WORK Analysis of requests for transactional data translations from experts (0.90); teleconference with S.Kim-Helms regarding strategy for managing review of the same (0.20); emails with DPPs regarding coordination on translations for experts (0.30); circulate completed translations suggested for inclusion to experts to DPPs (0.20).	550.00	1.60	880.00	Billable
4/2/2015 203097	Nathan Cihlar WORK Analysis of requests for transactional data translations from experts (0.50); emails with DPPs regarding coordination on translations (0.20); circulate completed translations with DPPs (0.10).	550.00	0.80	440.00	Billable
4/8/2015 203103	Nathan Cihlar WORK Emails with S. Kim-Helms and experts regarding outstanding translations requested (0.10); finalize and coordinate with foreign attorneys on completion of the same (0.30); emails with S. Kim-Helms regarding ongoing assignments related to translations (0.10).	550.00	0.50	275.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
4/14/2015 203110	Nathan Cihlar WORK Teleconference with V. Glaze, J. Moy and R. Spiegel regarding ongoing projects related to translations, contracts with vendors, certified translations, foreign document review (0.50); teleconference with R. Spiegel regarding strategy for translations, vendor issues (0.30); review/edit Park translation contract with edits proposed by DPPs (0.20); analysis of finalized CTs from Consortra to ensure consistency and usefulness for class cert (0.20).	550.00	1.20	660.00	Billable
4/15/2015 203126	Nathan Cihlar WORK Teleconference with R. Spiegel regarding management issues related to coding alterations, Toshiba document review preparations, foreign language issues (0.40); analyze coding manual and proposed alterations for next wave of production (0.90); review, edit latest certified translations from Consortra for accuracy, consistency, and usefulness for class cert (1.00).	550.00	2.30	1,265.00	Billable
4/16/2015 203129	Nathan Cihlar WORK Teleconference with R. Spiegel and document review leadership team to discuss ongoing projects (0.60); review, edit latest certified translations from Consortra for accuracy, usefulness and consistency (0.70); emails with V. Glaze regarding status of coordination on certified/informal translations (0.20).	550.00	1.50	825.00	Billable
4/17/2015 203133	Nathan Cihlar WORK Emails with V. Glaze regarding coordination on certified translations (0.20); emails with Consortra regarding translation procedures and information exchange protocols for translations, shared site coordination issues (0.40); review, edit latest certified translations from Consortra for accuracy, usefulness and consistency (0.60); coordinate/strategize with S. Kim-Helms and foreign speaking attorneys over managing assignments related to LG Chem production (0.40).	550.00	1.60	880.00	Billable
4/20/2015 203136	Nathan Cihlar WORK Analysis of informal translations related to LGC, LG Chem for final accuracy, usefulness, and consistency (1.00); teleconference with S. Kim-Helms regarding the same and coordination/assignments with DPPs, foreign attorneys (0.50); review and analysis of finalized certification for accuracy (0.50).	550.00	2.00	1,100.00	Billable
4/21/2015 203138	Nathan Cihlar WORK Teleconference with V. Glaze, R. Spiegel, DPPs regarding ongoing coordination related to translations, status of translations, assignments (0.60); teleconference with S. Kim-Helms regarding management issues of foreign review, status of translations, assignments (0.30); review and analysis of finalized certification for accuracy (0.70); emails with Consortra regarding issues with translations (0.40).	550.00	2.00	1,100.00	Billable
4/23/2015 203146	Nathan Cihlar WORK Teleconference with R. Spiegel regarding management of discovery for class certification issues, document review coding strategy related to the same (0.50); teleconference with R. Spiegel, L. Chan and others regarding issues related to document review structure and assignments (0.70).	550.00	1.20	660.00	Billable
4/24/2015 203150	Nathan Cihlar WORK Emails with S. Kim-Helms and R. Spiegel regarding coordination on translation projects with DPPs, strategy for assignments (0.40); teleconference with S. Kim-Helms regarding ongoing project status, new translation issues (0.30); review requests for translations from D. Lambrinos (0.20); locate, analyze and circulate requested translations, status to D. Lambrinos and group (0.50); review/analysis of outline from L. Chan regarding Toshiba (0.30); analyze documents identified needing translation/status of translations for usefulness and consistency for IPP position (0.40).	550.00	2.10	1,155.00	Billable
4/28/2015 203155	Nathan Cihlar WORK Teleconference with R. Spiegel regarding management and organization of foreign review, translations, coding panel edits (0.50); teleconference with Consortra, R. Spiegel regarding edits to coding panes, translation linking, other review issues (0.50); review/analysis/edit proposed structure for next wave of document review (0.50); emails with D. Lambrinos regarding shared drive issues for translations (0.50); analysis of cast of characters, alias issues (1.50); review memos by H. Rim, S.	550.00	6.00	3,300.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	Kim-Helms related to the same (2.50).				
4/30/2015 203165	Nathan Cihlar WORK Teleconference with leadership group including R. Spiegel, D. Lambrinos, L. Chan regarding management of document review and lead discussion of issues regarding foreign discovery and translations (0.50); emails with D. Lambrinos regarding transactional data sheets and potential identification of product numbers related to class rep purchases as requested by experts (0.70).	550.00	1.20	660.00	Billable
5/5/2015 203582	Nathan Cihlar WORK Emails with R. Spiegel regarding Catalyst administrative training and issues related to linking translations (0.30); coordination with DPPs on translation status through email (0.20); update/review latest certified translations to determine usefulness for class cert (0.40).	550.00	0.90	495.00	Billable
5/7/2015 203588	Nathan Cihlar WORK Teleconference with R. Spiegel regarding alterations to Catalyst coding, linking translations, administrative issues with Catalyst (0.90); training call with P. Daly of Catalyst regarding administration of system, translation issues, other document review issues (1.00); teleconference with R. Spiegel, L. Chan and document review management team regarding ongoing projects, translations and overall document review (0.60).	550.00	2.50	1,375.00	Billable
5/8/2015 203590	Nathan Cihlar WORK Emails with V. Glaze regarding Park Translation company contract, issues (0.50); emails with P. Koh of Park Translation regarding potential vendor (0.20); emails with R. Spiegel regarding same (0.10).	550.00	0.80	440.00	Billable
5/11/2015 203597	Nathan Cihlar WORK Emails with Consortra regarding revisions to translations, formatting issues and management of work flow with cert company.	550.00	0.50	275.00	Billable
5/12/2015 203599	Nathan Cihlar WORK Emails with V. Glaze, J. Moy of DPPs regarding coordination issues related to translations, status of translations (0.80); review/analysis/edit coding sheet template circulated by R. Spiegel (0.60); emails with R. Spiegel regarding the same (0.40); review status and management strategy for ongoing projects of translation team (0.40); teleconference with S. Kim-Helms regarding same (0.20).	550.00	2.40	1,320.00	Billable
5/12/2015 215586	Shinae Kim-Helms WORK Conference with N. Cihlar regarding contract terms with translation company.	425.00	0.50	212.50	Billable
5/13/2015 203600	Nathan Cihlar WORK Teleconference with R. Spiegel regarding Catalyst issues, administrative concerns, linking translations (0.40); emails with M. Hastings regarding Catalyst training, procedures and linking translations (0.10); review requests for translation from experts and status of translations (0.20); teleconference with S. Kim-Helms regarding same (0.10).	550.00	0.80	440.00	Billable
5/14/2015 203601	Nathan Cihlar WORK Teleconference with R. Spiegel, L. Chan and document review management team regarding ongoing projects, translations (0.50); draft edits to basic review form (0.50); circulate same to H. Rim and R. Spiegel (0.10); analysis of latest edited version of the same (0.40); emails with R. Spiegel and S. Kim-Helms regarding assignments for drafting short-form coding sheet and hot document sample sets (1.00); teleconference with M. Hasting of Catalyst regarding potential issues related to translations, linking the same and coding concerns related to foreign documents (0.50).	550.00	3.00	1,650.00	Billable
5/14/2015 215587	Shinae Kim-Helms WORK Assist in preparing short form coding sheet for reviewers per R. Spiegel.	425.00	0.40	170.00	Billable
5/15/2015 203602	Nathan Cihlar WORK Draft/edit case summary and coding manual for use in next stage of document review (1.50);	550.00	2.50	1,375.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	meetings with S. Kim-Helms regarding foreign language aspects related to same (0.50); teleconference with R. Spiegel regarding suggested edits to the same (0.50).				
5/17/2015 203603	Nathan Cihlar WORK Edit sample hot document review chart coding manual for use by reviewers in next stage of document review (1.00); teleconference with S. Kim-Helms regarding foreign language aspects related to same (0.20).	550.00	1.20	660.00	Billable
5/19/2015 203604	Nathan Cihlar WORK Management and strategic analysis of approach to ongoing projects of translation team (0.30); teleconference with S. Kim-Helms regarding same (0.20).	550.00	0.50	275.00	Billable
5/28/2015 203605	Nathan Cihlar WORK Teleconference with R. Spiegel regarding translation protocol, Catalyst issues, document review strategy (0.50); teleconference with document review management team regarding ongoing projects, latest productions, translation issues (0.50); analysis QC of foreign reviewers YQ Chung's and JW Huh's hot document lists (0.40); emails with S. Kim-Helms regarding strength of documents pertained in each list and consistency issues related to same (0.30).	550.00	1.70	935.00	Billable
6/3/2015 204287	Nathan Cihlar WORK Review suggested process for coding, coding manual circulated by R. Spiegel (0.70); emails with R. Spiegel regarding procedures suggested by M. Pilotin (0.30); teleconference with R. Spiegel suggesting streamlined approach to document review, instructed by documents pulled/used/entered (0.60).	550.00	1.60	880.00	Billable
6/4/2015 204291	Nathan Cihlar WORK Teleconference among document review leadership team (0.70); outline and update translation status for management team (0.30).	550.00	1.00	550.00	Billable
6/8/2015 215582	Nathan Cihlar WORK Teleconference with R. Spiegel regarding document review, issues with Catalyst, translations and coding manual (0.90); update/edit coding manual (1.00).	550.00	1.90	1,045.00	Billable
6/8/2015 215591	Shinae Kim-Helms WORK Teleconference with N. Cihlar regarding translation request protocol (0.50); draft proposed changes to coding pane for foreign documents per N. Cihlar (1.20).	425.00	1.70	722.50	Billable
6/9/2015 204334	Nathan Cihlar WORK Teleconference with J. Moy, V. Glaze regarding coordination with DPPs on informal translations, assignments, certified issues (0.60); teleconference with R. Spiegel regarding case management, document review status and management issues (0.80); analyze/edit coding manual and reviewer short-form coding sheet (2.70); meetings with S. Kim-Helms regarding same (0.60).	550.00	4.70	2,585.00	Billable
6/10/2015 215588	Shinae Kim-Helms WORK Review and propose revisions to Merits Review Manual and short-form coding manual per R. Spiegel (0.60); revise versions with detailed explanations and circulate to R. Spiegel, N. Cihlar and others (1.60).	425.00	2.20	935.00	Billable
6/11/2015 204335	Nathan Cihlar WORK Analyze/edit coding manual and reviewer short-form coding sheet (0.80); teleconference with R. Spiegel and document review leadership team regarding ongoing review, production, translation issues (0.90); update master tracking chart for translations (1.20); circulate calculations of certifications to K. Jones, R Spiegel and others per request during leadership teleconference (0.70).	550.00	3.60	1,980.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
6/11/2015 215589	Shinae Kim-Helms WORK Continue to review and propose revisions to Batteries Merits Review Manual and short-form coding manual per R. Spiegel (1.40); e-mails with N. Cihlar regarding same (0.40).	425.00	1.80	765.00	Billable
6/12/2015 215583	Nathan Cihlar WORK Teleconference with R. Spiegel regarding coordination with DPPs, requests for certified translation (0.20); teleconference with Consortra regarding status of certification of documents for use in notice of depo of Kwak (0.20); emails with A. Sheanin/DPPs regarding same (0.20).	550.00	0.60	330.00	Billable
6/15/2015 204337	Nathan Cihlar WORK Strategize for response to SJM with R. Spiegel and edit/ legal analysis of R. Spiegel excel chart outlining documents proposed for certification for response to Toshiba SJM (1.30); teleconferences with S. Kim-Helms regarding the same (0.20).	550.00	1.50	825.00	Billable
6/17/2015 204339	Nathan Cihlar WORK Review/edits to coding manual, Catalyst coding panels (0.80); teleconference with R. Spiegel regarding same and to discuss preparations for training call and deposition preparations (0.70); participate in training call run by Catalyst (1.00).	550.00	2.50	1,375.00	Billable
6/18/2015 204340	Nathan Cihlar WORK Teleconference with R. Spiegel and S. Kim-Helms regarding strategy management and protocol for deposition preparations and procedures, SH Kwak depo preparation, best potential deponents.	550.00	1.00	550.00	Billable
6/29/2015 204342	Nathan Cihlar WORK Review/edit/analyze background charts, memos on best potential deponents (1.50); teleconference with B. Glackin, D. Lambrinos, R. Spiegel and others regarding potential witness lists, strategy for order of deponents (1.00).	550.00	2.50	1,375.00	Billable
7/1/2015 205886	Nathan Cihlar WORK Analysis of procedures/coding instructions and paths for foreign document review in Catalyst (0.60); teleconferences with R. Spiegel and S. Kim-Helms regarding procedures, modifications to the same to limit duplication of efforts of review (0.20); emails with R. Spiegel regarding coding procedures for certified translations (0.20).	550.00	1.00	550.00	Billable
7/2/2015 205887	Nathan Cihlar WORK Teleconference among document review leadership team to update status of review, coding, translations (0.70); analysis of DPP requests for translation (0.40); meetings with R. Noh regarding de-duping of the same (0.20); emails with S. Kim-Helms regarding same (0.20).	550.00	1.50	825.00	Billable
7/7/2015 205888	Nathan Cihlar WORK Teleconference among document review management team to discuss documents located to date, batching, coding procedures (0.50); teleconference with R. Spiegel regarding specific issues of interest for targeted searches in preparation for class cert (0.50); review and analysis, edit background memo related to D. Lee (1.00); teleconference with S. Kim-Helms regarding same (0.10).	550.00	2.10	1,155.00	Billable
7/9/2015 205889	Nathan Cihlar WORK Teleconference among document review leadership team regarding ongoing review, production, and lead discussion of translation issues (0.70).	550.00	0.70	385.00	Billable
7/20/2015 205892	Nathan Cihlar WORK Teleconference among document review leadership team regarding ongoing review, production, lead discussion on translation issues (0.50); update master tracking chart for translations to ensure consistency and usefulness of proposed docs to send to experts and lead counsel (0.60).	550.00	1.10	605.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
7/28/2015 205894	Nathan Cihlar WORK Emails with J. Moy regarding DPP proposed documents for translations to ensure consistent with IPP position (0.30); emails with S. Scarlett, M. Pilotin, D. Lambrinos regarding proposed documents for certification with summaries of the same (0.50).	550.00	0.80	440.00	Billable
7/30/2015 205895	Nathan Cihlar WORK Teleconference with R. Spiegel regarding translation issues related to upcoming depositions, preparations for the same (0.60); teleconference with R. Spiegel and document review leadership team regarding ongoing review, production, translation issues (0.50); review and analysis of documents proposed by D. Lambrinos for inclusion for certification (0.80); emails with S. Nagano and D. Lambrinos regarding the same (0.40).	550.00	2.30	1,265.00	Billable
8/7/2015 206495	Nathan Cihlar WORK Teleconference with D. Lambrinos regarding deposition preparations [redacted] hot documents related to the same, and translation issues (0.50); review list of documents proposed for translation circulated by DPPs and IPPs [redacted] (2.00); emails with J. Moy and DPPs regarding joint list and translations requests [redacted] (0.30).	550.00	2.80	1,540.00	Billable
8/13/2015 206498	Nathan Cihlar WORK Teleconference among discovery review leadership team regarding ongoing document review projects, deposition preparations and translation issues (0.60); emails with D. Lambrinos regarding [redacted] management of translations of the same (0.40)	550.00	1.00	550.00	Billable
8/24/2015 206503	Nathan Cihlar WORK Review and analysis of documents proposed for translation by D. Lambrinos [redacted] (0.50); work with S. Kim-Helms and R. Noh on cross-check of the same (0.30); draft summary email with status of translations and proposal of reduction of requests for translation (0.20).	550.00	1.00	550.00	Billable
8/25/2015 206504	Nathan Cihlar WORK Analysis of list of documents requested for translations [redacted] (0.30); teleconferences with S. Kim-Helms regarding the same (0.30); emails with D. Lambrinos and others regarding status of translations, cross-check of duplicates and determination of usefulness and cost effectiveness of requests of same (0.70); review translation protocol for proper rules regarding coordination of service of objections to translations (0.50).	550.00	1.80	990.00	Billable
8/26/2015 206505	Nathan Cihlar WORK Teleconference with D. Lambrinos, S. Kim-Helms, S. Nagano regarding proposed list of translations [redacted] to ensure usefulness and cost effectiveness (0.30); review and analyze proposed list of documents for translation for cost effectiveness and accuracy (0.40); teleconference and work with translation company regarding timing of translations, corrections to certified translations to date (0.50).	550.00	1.20	660.00	Billable
11/3/2015 207581	Shinae Kim-Helms WORK E-mails with N. Cihlar regarding translation prepared and entered by DAPs at Fujitomo deposition (0.30); check docket for DAPs per N. Cihlar (0.20).	425.00	0.50	212.50	Billable
12/3/2015 208094	Nathan Cihlar WORK Emails with S. Kim-Helms regarding questions related to managing translation certification issues and documents for use at ongoing depositions per L. Chan and D. Lambrinos.	550.00	0.50	275.00	Billable
12/7/2015 207945	Shinae Kim-Helms WORK Teleconference with N. Cihlar to discuss strategy to handle translations entered by DAPs.	425.00	0.30	127.50	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
12/21/2015 215567	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding updating exhibit list and project management related to the same.	550.00	0.40	220.00	Billable
12/22/2015 208104	Nathan Cihlar WORK Meetings with S. Kim-Helms, R. Noh and A. Gooding to discuss status and management of the translation index, translations and exhibit list projects (0.30); analysis, edit to translation index (0.40).	550.00	0.70	385.00	Billable
1/11/2016 208335	Nathan Cihlar WORK Emails with S. Kim-Helms regarding issues related to incomplete translations entered into record (0.20); review documents entered and analyze approach to correct the same (0.20).	550.00	0.40	220.00	Billable
1/14/2016 208442	Nathan Cihlar WORK Review and analysis of translation protocol as it relates to coordination requirements with DAPs (0.60); teleconference with V. Glaze of DPPs regarding protocol as it relates to potential objections and procedure for handling poor translations filed by DAPs (0.40).	550.00	1.00	550.00	Billable
1/22/2016 215568	Nathan Cihlar WORK Teleconference with V. Glaze regarding DPP concerns over DAP translations and protocol issues related to objecting to the same (0.70); outline potential approach to the same and circulate options to lead counsel including S. Scarlett, L. Chan, D. Lambrinos regarding position (0.30).	550.00	1.00	550.00	Billable
1/26/2016 208465	Nathan Cihlar WORK Emails with V. Glaze regarding case management and translation protocol issues regarding potential use of informal transactional translations for experts papers in support of certification.	550.00	0.50	275.00	Billable
1/27/2016 208466	Nathan Cihlar WORK Teleconference with L. Chan regarding management issues and approach to DAP translations, objections to the same, and responses to Defendants objections to DAPs entered translations (0.50); emails with S. Scarlett, L. Chan and B. Glackin regarding approach to DAP translations, issues related to operative translations, wording of translation protocol (0.50); review and analysis of DAP participation in coordination on translations according to translation protocol (1.30).	550.00	2.30	1,265.00	Billable
2/3/2016 209142	Nathan Cihlar WORK Emails with V. Glaze regarding coordination on and corrections to current objection translation tracking chart (0.40); teleconference with S. Kim-Helms regarding the same (0.30).	550.00	0.70	385.00	Billable
2/5/2016 209155	Shinae Kim-Helms WORK Review email correspondences between DPPs and IPPs regarding issues related to depositions via Hague Convention (0.30); teleconference with N. Cihlar regarding depositions [redacted] (0.30); join teleconference with S. Scarlett and DPPs counsel [redacted] (0.30); review memo regarding same (0.60).	425.00	1.50	637.50	Billable
2/15/2016 209145	Nathan Cihlar WORK Teleconference with V. Glaze regarding issues with coordination of Defendants on their objections to translations (0.30); emails with S Kim-Helms, A. Kobori and V. Glaze regarding the same (0.10).	550.00	0.40	220.00	Billable
3/9/2016 209458	Shinae Kim-Helms WORK Review and analyze Consortra invoice and log per L. Chan (0.80); teleconference with N. Cihlar regarding same (0.30); teleconference with L. Chan regarding same (0.30); explain potential issues to L. Chan via email (0.40).	425.00	1.80	765.00	Billable
3/9/2016 209654	Nathan Cihlar WORK Teleconference with S. Kim-Helms [redacted] (0.30); [redacted] (0.30); [redacted]	550.00	0.80	440.00	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
	[redacted] (0.20).				
3/11/2016 209465	Shinae Kim-Helms WORK E-mails with L. Chan and [redacted] (0.20); review and revise email to Consortra (0.30).	425.00	0.50	212.50	Billable
3/11/2016 209666	Nathan Cihlar WORK Teleconference with S. Kim-Helms regarding discovery request by Defendants related to missing translations from class certification brief (0.20); e-mails with C. Voigt regarding compilation of the same (0.20); teleconference and emails with V. Glaze regarding issues related to objections and subject/pronoun" omissions from Defendants and how to respond to same (0.60); edit responses to objections related to Matsumoto pertaining to the same (1.80).	550.00	2.80	1,540.00	Billable
3/14/2016 209469	Shinae Kim-Helms WORK Teleconference with Consortra, L. Chan and V. Glaze to [redacted] 0.40); e-mails with L. Chan regarding same (0.60).	425.00	1.00	425.00	Billable
5/2/2016 210093	Shinae Kim-Helms WORK [redacted] per L. Chan (0.50); e-mail summary to L. Chan (0.20).	425.00	0.70	297.50	Billable
7/11/2016 211841	Shinae Kim-Helms WORK [redacted] (0.10); [redacted] (0.10); e-mail to L. Chan summary of review (0.20).	425.00	0.40	170.00	Billable
8/16/2016 212334	Shinae Kim-Helms WORK E-mails with L. Chan regarding drafting email to Consortra regarding use of image files (0.20); e-mails with N. Cihlar regarding same (0.30); [redacted] (1.00).	425.00	1.50	637.50	Billable
8/17/2016 212337	Shinae Kim-Helms WORK Teleconference with L. Chan regarding suggested formatting to certified translations to reduce translation costs (0.30); e-mails with V. Glaze and L. Chan regarding translation protocol related issues (0.30); provide L. Chan with draft email sent to Consortra regarding formatting (0.30); review translations previously certified by Consortra (0.70).	425.00	1.60	680.00	Billable
9/6/2016 212605	Shinae Kim-Helms WORK [redacted] (0.30); [redacted] (0.20).	425.00	0.50	212.50	Billable
11/15/2016 213499	Shinae Kim-Helms WORK Review [redacted].	425.00	1.50	637.50	Billable
11/17/2016 213507	Shinae Kim-Helms WORK E-mails with B. Troxel regarding replacement copy of crawled back document (0.30); receive and review updated deposition index prepared by A. Gooding and E. Miorin (0.30); e-mails with A. Gooding regarding same (0.30); e-mail to B. Troxel regarding said status (0.30).	425.00	1.20	510.00	Billable
11/23/2016 213523	Shinae Kim-Helms WORK Review updated deposition index and translation tracking chart prepared by A. Gooding and E. Miorin (0.40); circulate same to S. Scarlett and B. Troxel (0.10).	425.00	0.50	212.50	Billable
11/29/2016 213529	Shinae Kim-Helms WORK [redacted] (0.30); [redacted] (0.20).	425.00	0.50	212.50	Billable

244/Ion Battery (11): (continued)

Date / ID	Timekeeper / Task	Rate / Markup %	Hours / DNB Time	Amount / DNB Amt	Total
1/4/2017 214565	Nathan Cihlar WORK	550.00	0.80	440.00	Billable
	[redacted] (0.40); [redacted] (0.40).				
1/10/2017 214567	Nathan Cihlar WORK	550.00	0.40	220.00	Billable
	Emails with D. Lambrinos regarding potential custodians and witnesses for depositions (0.10); review and analysis of potential witnesses, names for deposition (0.30).				
2/8/2017 214851	Shinae Kim-Helms WORK	425.00	1.00	425.00	Billable
	[redacted] (0.40); [redacted] (0.20); [redacted] (0.40).				
Total: WORK			317.40		$168,976.50
TOTAL	Billable Fees		317.40		$168,976.50
Total of billable expense slips					$0.00

	Amount	Total
Total of Fees (Time Charges)		$168,976.50
Total of Costs (Expense Charges)		$0.00
Total new charges		$168,976.50
Total New Balance		$168,976.50

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
CL	425.00	0.40	$170.00	$170.00	0.00
NC	550.00	267.10	$146,905.00	$146,905.00	0.00
NC	495.00	6.20	$3,069.00	$3,069.00	0.00
SK	425.00	21.60	$9,180.00	$9,180.00	0.00
SK	385.00	4.30	$1,655.50	$1,655.50	0.00
TDB	695.00	1.60	$1,112.00	$1,112.00	0.00
TMP	425.00	16.20	$6,885.00	$6,885.00	0.00

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
STRAUS & BOIES, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	$125,000.00
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	$33.41
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	$456.62
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$141.00
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	$6.82
Travel	
Miscellaneous	
TOTAL:	$125,637.85

EXHIBIT 63

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF STEVEN G. SKLAVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SUSMAN GODFREY L.L.P.**

I, Steven G. Sklaver, declare:

1. I am a partner of Susman Godfrey L.L.P., ("Susman Godfrey") Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representative Anna Jawor, Andrew Fennelly, David Reymann and as counsel for IPPs throughout the course of this litigation. The background and experience of Susman Godfrey and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Susman Godfrey performed the following work: conducting legal research for purposes of preparing amended pleadings and opposing multiple motions to dismiss; assisting in briefing responses to multiple motions to dismiss; assisting in preparing amended pleadings; conducting document review (including foreign language) for purposes of responding to motions to dismiss, preparing amended pleadings, and taking deposition discovery; reviewing documents for production in response to written discovery requests; preparing and serving written responses to written discovery; preparing and serving amended responses to written discovery; preparing and serving written discovery on defendants; reviewing defendants' responses to written discovery; identifying deficiencies in defendants' discovery responses and participating in multiple meet and confer conferences with multiple defendants to address deficiencies in written discovery responses and document productions; taking the lead in coordinating the depositions of class representatives; preparing and defending the majority of the depositions of class representatives; and conferring with class representatives

regarding case status; and conferring with co-lead counsel regarding case strategy, discovery and case status.

5. Attached hereto as **Exhibit B** is a billing summary of Susman Godfrey's total hours and lodestar, computed at current billing rates, from March 1, 2017 to present. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Susman Godfrey. Attached hereto as **Exhibit C** is a compilation of my firm's detailed time records at historical billing rates**.** The lodestar amount is for work assigned by Co-Lead Counsel and was performed by professional staff at my law firm.

6. A summary of work performed by Susman Godfrey and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of Steven G. Sklaver in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Susman Godfrey and filed on May 26, 2017. (ECF No. 1813-40). Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

7. In summary, the total number of hours spent by Susman Godfrey since June 1, 2013 was $2,874.20, with a corresponding lodestar of $1,291,967.00 based on current rates.

8. Attached hereto as **Exhibit D** is a summary of the expenses Susman Godfrey has incurred from June 1, 2013 to present, plus applicable case filing fees. Susman Godfrey expended a total of $192,542.43 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Susman Godfrey on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit D were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Susman Godfrey in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 5, 2019 at Los Angeles, California.

/s/ Steven G. Sklaver

STEVEN G. SKLAVER

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

Class Action

5/30/2017

For over thirty-five years, Susman Godfrey has been one of the preeminent firms in the country in class action cases. We have secured billions of dollars in victories for our clients across many fields, including antitrust and price-fixing cases, securities litigation, consumer class actions, and products liability cases. From the Corrugated Container antitrust class action, where Steve Susman's team recovered $500 million for the plaintiffs, to 2015's $37.5 million class action win ($23 million after fees and expenses) for a class of more than 7000 limited partners who invested in 12 oil and gas limited partnerships , the Firm has a tradition of winning results, against the fiercest adversaries, when the stakes are highest. Defendants have also recognized the expertise and prowess of the Firm in class action litigation and the Firm has been retained to represent Defendants in a number of high stakes class action cases.

Some of the other recent significant results in class action cases the Firm has handled include:

- In May 2017, Susman Godfrey, along with co-counsel, secured a $43.45 million cash fund and an agreement to pay future royalties to settle a class-action lawsuit with Spotify brought on behalf of music copyright owners. The suit alleged that Spotify made music available online without securing mechanical rights from the tracks' composers. Under the agreement terms, Spotify will establish a $43.45 million settlement fund from which qualifying class members will receive compensation for past streaming or downloads of their compositions. Spotify also agreed to pay future royalties calculated at the statutory rate for songs streamed by the service, and make its track database available for claimants. In addition, Spotify is responsible for all costs associated with the administration and management of the settlement fund and notice, which adds an additional $1 million to $2 million in benefits alone.

- Susman Godfrey represents Flo & Eddie, members of the 1960's rock group The Turtles, in addition to a class of copyright owners in a case against Sirius XM in the Central District of California. In this landmark case it was established under California law, that

owners of sound recordings from before 1972 have the exclusive right to perform those recordings. This case confirmed that owners of "oldies" sound recordings cannot have their music performed for free/without their consent. Under a groundbreaking settlement, this class of owners will be compensated up to $40 million for their past performances and up to another $59 million in future royalties from Sirius XM through 2028 — the highest running royalty any direct licensor has obtained for pre 1972 sound recordings. The case is set to be tried in several other states and against other broadcasters.

- In a seminal insurance class action filed in the Southern District of New York, resolved in September 2015, Susman Godfrey served as lead counsel in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final Pretrial Conference — less than two months before trial. Settlement terms included: $48.5 million cash fund ($34 million after fees and expenses), COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded: "I want to say publicly that I think this is an excellent settlement. I think this is a superb – this may be the best settlement pound for pound for the class that I've ever seen."

- A class of 800,000 Comcast cable subscribers represented in part by Susman Godfrey alleged that between Jan. 1, 2003 and Dec. 31, 2008, Comcast and other cable companies entered into subscriber swaps and acquisitions that deterred over-builder competition and enabled Comcast to raise prices to supracompetitive levels, in violation of sections 1 and 2 of the Sherman Act. The parties settled for $50 million after remand of the case from the U.S. Supreme Court. Final settlement (after fees and expenses) is to be determined later in 2015.

- In May 2014 Susman Godfrey secured a $19 million cash settlement for customers of two New York City tour bus companies (approximately $12 million after fees and expenses), Coach USA Inc. and City Sights LLC, and their joint venture, Twin America LLC. The settlement ends an antitrust class action against the joint venture, which plaintiffs said eliminated competition between the two bus companies and artificially raised prices for passengers.

- In December 2013 Susman Godfrey attorneys secured $86 million in settlements (approximately $62 million after fees and expenses) when serving as co-lead counsel in

litigation involving more than 70 class action cases on behalf of airline passengers who alleged that between January 1, 2000 and August 1, 2007, Korean Air Lines and Asiana Airlines conspired to fix the price of air travel between the United States and the Republic of Korea. The lawsuit asserted that the two airlines, in violation of federal antitrust laws, participated in meetings, conversations and communications during which they agreed to establish artificially high prices for air passenger travel.

- In July 2013 Toyota Motor Corporation agreed to pay benefits worth up to $1.6 billion (approximately $1.4 billion after fees and expenses) to settle multi-district class action litigation pending in federal court in Santa Ana, California. In the litigation, plaintiffs, represented by Susman Godfrey, asserted claims for economic losses associated with recalls for unintended acceleration problems in Toyota, Lexus and Scion vehicles.

- In March 2013, Susman Godfrey secured a jury verdict in an antitrust price-fixing class action brought on behalf of direct purchasers of vitamin C against two Chinese vitamin C manufacturers. The $54.1 million verdict was tripled as required by law and after adjusting for $32.5 million in settlements with other defendants ($19.5 million net of fees and expenses), a final judgment of $147 million was entered against the defendants. The judgment is now on appeal to the Second Circuit Court of Appeals.

- Susman Godfrey represented investors who were allegedly defrauded into purchasing securities issued by the parent of mortgage lender IndyMac Bank. The complaint alleged that IndyMac had misrepresented its financial health and the quality of its lending practices. In January 2013, after more than five years of intense, hard-fought litigation, the court granted final approval of a $6.5 million recovery for the class (approximately $4 million after fees and expenses).

- In White, et al. v. NCAA, Susman Godfrey served as co-lead counsel in an antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. The NCAA settled and paid, after fees and expenses, an additional $218 million for use by current student-athletes to cover the costs of attending college and paid $10 million to cover educational and professional development expenses for former student-athletes.

- Susman Godfrey has been appointed to serve as lead or co-lead counsel in over a dozen antitrust class actions since 1996. In appointing Susman Godfrey co-lead counsel in one such case, In re Crude Oil, Judge Pauley praised the firm's long history of serving as "lead counsel in hundreds of class actions, including complex antitrust actions." See In re Crude Oil Commodity Futures Litig., No. 11-CV-3600 (WHP), 2012 WL 569195, at *2 (S.D.N.Y. Feb. 14, 2012).

Consumer

Susman Godfrey prides itself on its deep bench of talent, wide range of experience, and ability to take on any case, any time. Its experience in class and mass action cases is not limited to the antitrust and securities fields-the Firm has scored multi-million dollar victories in consumer and civil rights cases, oil royalty and contract litigation, and has successfully represented defendants in a host of "bet the company" class action cases.

- Clark v. AdvanceMe, Inc., a class action brought in Los Angeles federal court challenging financial arrangements with retail merchants under California's laws against usury. Marc Seltzer, Arun Subramanian, and Drew Hansen served as lead counsel for the class. In 2011, the case was settled for approximately $23.4 million in cash and other economic consideration, approximately $19 million net to the class.
- In 2010, Susman Godfrey was appointed co-lead counsel in the wide-ranging Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation. Susman Godfrey partners Marc Seltzer, Steven Sklaver and Rob Safi are in charge of this high-profile case, representing the economic loss class action plaintiffs.
- In November 2008, the Firm won a jury trial for a class of California residential telephone customers against AT&T. The case involved a claim that AT&T overcharged customers by collecting $16.5 million more in Universal Service Fund charges than it paid into the Fund. The Tenth Circuit upheld the verdict. In re Universal Service Fund Telephone Billing Practices Litig., 619 F.3d 1188 (10th Cir. 2010). Susman Godfrey served as lead trial counsel and briefed and argued the appeal.
- In July 2008, Susman Godfrey represented the Hertz Corporation in a class action case challenging the company's rental car fuel service charges. Eric Mayer successfully argued and won the appeal in the case. The class consisted of tens of thousands of class members and Plaintiffs alleged millions of dollars in damages. The Court of Appeals for the Thirteenth District Court of Texas reversed the trial court's class certification order and decertified the class on all claims. This victory will serve as persuasive authority in similar cases around the country.
- In 2006, on behalf of 4300 royalty and overriding royalty owners across the United States, Susman Godfrey attorneys Tom Paterson, Shawn Raymond, and New Mexico co-

counsel obtained a $27.5 million settlement with ConocoPhillips for alleged underpayment of royalty on natural gas liquids produced from the San Juan Basin of northwestern New Mexico and processed at the New Blanco Plant near Bloomfield, New Mexico.

- In 2005, less than a week before the start of a jury trial in Clayton, New Mexico, OXY USA, Inc. agreed to pay $12 million to settle a class action lawsuit brought by Susman Godfrey's Thomas W. Paterson and Shawn Raymond and New Mexico co-counsel on behalf of a class of royalty owners who had leased mineral rights to OXY for the production of C02 at the Bravo Dome Unit in northeastern New Mexico. The $12 million settlement represented approximately 90% of the total amount of actual damages sought by the class. The settlement also required OXY to pay litigation expenses of $400,000 and settlement administration expenses of $200,000. Finally, OXY has agreed to change how it calculates plaintiffs' royalty on a going-forward basis. This change will result in a near doubling of the royalty amounts OXY was paying the class members before the filing of this lawsuit in 2004.
- In 2004, Susman Godfrey's Bill Carmody won a net $40 million settlement in Shockey v. Chevron U.S.A., a royalty class action, after prevailing on hotly contested issues of class certification and choice of law.
- Susman Godfrey obtained class certification from the Middle District of Florida for a class of African-American employees of Western Auto Supply Co. (now owned by Advance Stores Company, Inc.) who were suing the former auto parts retailer for racial discrimination. The defendants immediately appealed the certification decision to the United States Court of Appeals for the Eleventh Circuit. Susman Godfrey's Joseph Grinstein briefed and argued the appeal, and the Eleventh Circuit affirmed the class certification decision — the first such class action the Eleventh Circuit had upheld in decades. The case settled in 2003, with the defendants making a substantial payment to the class.

SUSMAN GODFREY L.L.P.



Marc M. Seltzer

Partner

Los Angeles
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mseltzer@susmangodfrey.com

Overview

Marc Seltzer has practiced law for more than forty-five years, litigating complex cases in state and federal courts throughout the United States. Before joining Susman Godfrey, he was a principal in the law firm of Corinblit & Seltzer, a Professional Corporation. Marc Seltzer's relationship with the lawyers of Susman Godfrey began in the late 1970's, when he worked with Steve Susman on the *Corrugated Container* antitrust case. In the ensuing years, Mr. Seltzer joined forces with Susman Godfrey on a number of other cases. In February 1998, Marc Seltzer became a partner of the firm, and opened the firm's Los Angeles office. Since then, the firm's Los Angeles office has become one of the leading litigation boutiques in California.

Marc Seltzer's involvement in nationally prominent litigation began in the mid-1970's, when he was tapped by Jack Corinblit to work on the massive *Equity Funding* securities litigation. That case consisted of more than 100 consolidated class and individual cases, and was settled in 1976 for over $60 million, then the largest recovery ever achieved in a securities fraud class action. *See In re Equity Funding Corp. of America Securities Litigation*, 438 F. Supp. 1303 (C.D. Cal. 1977). Later, in the 1980's, Mr. Seltzer was appointed by the Los Angeles federal court to serve as sole lead counsel to represent the plaintiff class in the *ZZZZ Best* securities fraud case. The *ZZZZ Best* fraud was described by the United States Attorney for the Central District of California as "the most massive and elaborate securities fraud perpetrated on the West Coast in over a decade," harking back to the *Equity Funding* case. The case resulted in several important published decisions sustaining plaintiffs' claims. *See In re ZZZZ Best Securities Litigation*, 864 F. Supp. 960 (C.D. Cal. 1994).

Since joining the firm, Mr. Seltzer has continued to represent both plaintiffs and defendants in a wide variety of high stakes cases. Among other prominent cases, Mr. Seltzer served as co-trial counsel with Steve Susman in representing Frank McCourt in his marital property litigation with his former wife which involved competing claims to ownership of the Los Angeles Dodgers. In 2015, Mr. Seltzer successfully argued the appeal taken by Ms. McCourt from the order denying her motion to set aside the settlement reached in that case.

In the *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, Marc Seltzer was appointed by the Court to serve as one of the co-lead counsel for the economic loss class action plaintiffs. After three years of hard fought litigation, an historic settlement was reached valued by the Court at approximately $1.6 billion, with the class receiving net benefits valued at approximately $1.4 billion.

Mr. Seltzer is currently leading Susman Godfrey's efforts as one of co-lead counsel for plaintiffs in *In re*

of Justice has called the cartels that are the subject of this litigation the largest group of price-fixing conspiracies ever uncovered. The cases have been partially settled for more than a billion dollars.

In 2018, Seltzer was named one of thirty "Top Plaintiffs Lawyers" and one of the "Top 100 Lawyers" in California by the *Los Angeles Daily Journal.* Seltzer was honored twice in late 2017 for his ground-breaking antitrust work. In December, 2017, Seltzer was named an "Competition MVP" by *Law360* and in September 2017, Seltzer was named a "Giant Slayer" by *The Recorder* (ALM Publication). These recognition were in large part due to his leadership roles in *In re: Auto Parts* and *In re Animation Workers Antitrust Litigation,* the latter in which Seltzer took on the world's largest animation companies, including Disney, Pixar, Lucasfilm Ltd., Dreamworks and Sony, on behalf of animation employees and recovered nearly $170 million.

In December 2013, Mr. Seltzer was named to *Law360's* annual list of legal "MVPs." He was one of just three attorneys in the nation selected by *Law360* for recognition in the Class Action category. He has also been named to the *International Who's Who of Competition Lawyers & Economists.* Nominees were selected by *Global Competition Review* based upon "comprehensive, independent survey work with both general counsel and private practice lawyers worldwide." Seltzer has been named to this list many times, most recently in 2018.

Additionally, Mr. Seltzer's many significant class action achievements helped secure Susman Godfrey's recognition as *Law360's* "Class Action Group of the Year" in 2017 and 2018.

Over his many years of practice, Mr. Seltzer has also represented defendants in antitrust, securities, copyright, trademark, trade secret, unfair competition, class action and other complex litigation.

Mr. Seltzer has also been recognized for his service to the legal community.

Education

- University of California at Berkeley (B.A., 1969)
- UCLA School of Law (J.D., 1972)

Honors and Distinctions

- Selected as one of the Top 100 Lawyers in California in 2018 by *The Los Angeles Daily Journal*
- Selected as one of the 30 Top Plaintiff Lawyers in all of California in 2018 by *The Los Angeles Daily Journal*
- Recognized by Chambers U.S. for Litigation: General Commercial (California, 2018)
- Named a "Leading Lawyers" for "Antitrust – Civil litigation/Class Actions – Plaintiff" by The Legal 500 (2018)
- Recipient, 2012 Jewish Federation of Los Angeles' Bruce I. Hochman-Maimonides Torch of Justice Award
- Recipient, 2004 American ORT Jurisprudence Award
- Named a "Super Lawyer" by Southern California Law & Politics magazine (2004-2019, Thomson Reuters)
- Named one of Law Dragon's 500 Leading Plaintiff's Lawyers (2007)
- Named one of Law Dragon's 100 Lawyers You Need To Know in Securities Litigation (2008)
- Named a "Class Action MVP" by *Law360* (2013)
- Named a Litigation Star by *Benchmark Litigation* (2014 – 2017)
- Ranked by Martindale-Hubbell as an AV Preeminent Lawyer (2017 – 2019)

- Selected as one of the 30 Top Plaintiff Lawyers in all of California in 2016 by *The Los Angeles Daily Journal*
- Named by *US News* as one of the *Best Lawyers in America* for Commercial Litigation and Litigation – Securities (Los Angeles, 2016-2019, *Woodward-White, Inc.*)
- Named a "Giant Slayer" by *The Recorder* (2017, ALM Publication)
- Named a "Competition MVP" by *Law360* (2017)
- Named to the Global Competition Review's *Who's Who Legal: Competition* – a guide to the world's leading competition lawyers and economists (2018, 2019).

Books and Articles

- Co-author, California Federal Civil Rules (LexisNexis 2017)
- Co-author, California State Antitrust and Unfair Competition Law (Matthew Bender & Co. 2014), published by the Antitrust and Unfair Competition Law Section, State Bar of California
- "Choosing Between Class and Derivative Actions," published in Second Annual Institute, Class and Derivative Litigation in the 1990's — The New Frontier (Prentice Hall Law & Bus. 1991); and the same topic for subsequent Annual Institutes
- "Measures of Damages in Private Actions for Violations of the Federal Securities Laws: The Basic Rules and Selected Problems," published in Securities Litigation 1990 (PLI 1990)
- "Shareholders' Derivative Suits in Contests for Corporate Control," published in Securities Litigation 1986: Prosecution and Defense Strategies (PLI 1986)

Professional Associations and Memberships

- Past Vice-Chair of the Executive Committee, Antitrust and Unfair Competition Law Section, State Bar of California
- Past President and current member of the Board of Directors of the Ninth Judicial Circuit Historical Society
- Past President and current member of the Board of Directors of the Legal Aid Foundation of Los Angeles
- Life Member of the American Law Institute
- Member, Advisory Board of the American Antitrust Institute
- Member, The Chancery Club
- Member, Board of Directors of the American Constitution Society for Law and Policy
- Member, Board of Directors of the National Equal Justice Library
- Member, Board of Directors, American Friends of Hebrew University, Western Region
- Member, Board of Trustees of the Lawyers Committee for Civil Rights Under Law
- Member, Board of Directors of the Friends of the Los Angeles County Law Library
- Life Fellow of the American Bar Foundation
- Member, American Bar Association (and its Business Law, Antitrust Law, Torts and Insurance Law, and Litigation Sections)
- Member, Board of Counselors for Equal Justice Works

Notable Representation

- In re: *Libor-Based Financial Instruments Antitrust Litigation,* Susman Godfrey serves as court-appointed co-lead counsel in this consolidated antitrust proceeding arising out of the LIBOR scandal. Seltzer is one of most senior members of the Susman Godfrey trial team in this litigation. Susman Godfrey represents the over-the-counter direct purchaser class, which was certified by the Court in 2018- the only one of several proposed classes to receive certification. Recent agreements with several defendants have brought settlements to date to nearly $600 million. Each of the settling defendants has also agreed to

cooperate in the ongoing litigation against the remaining non-settling defendants.

- *In re Animation Workers Antitrust Litigation*, consolidated class actions filed in San Jose federal court on behalf of animation workers who were allegedly subject to wage suppression as a result of "no poaching" agreements by their employers. Marc Seltzer and the firm were appointed to serve as co-lead counsel for the plaintiffs. Over $168 million in settlements, before fees and expenses, were secured for the benefit of the class. Seltzer was named a "Giant Slayer" by *The Recorder* (2017, ALM Publication) for his work on this case.

- *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, consisting of more than eighty consolidated antitrust class action cases pending in the Los Angeles federal court. Marc Seltzer was appointed by the Los Angeles federal court to serve as one of the co-lead counsel for the class. Plaintiffs alleged that the two airline company defendants conspired to fix the prices of tickets for travel between the United States and Korea. The case was settled for $86 million in cash and travel vouchers, with the class receiving approximately $60 million.

- *Schulein, et al. v. Petroleum Development Corp., et al.,* a case in which Marc Seltzer served as lead counsel for the plaintiffs in a class action brought in Santa Ana federal court on behalf of more than 7000 limited partners who invested in 12 oil and gas limited partnerships. Plaintiffs alleged the defendants made false and misleading statements and omitted material information regarding the value of the partnerships in proxy statements used to solicit votes in favor of mergers that cashed the plaintiffs out of their investments. After three years of hard fought litigation, the case was settled on the eve of trial for $37.5 million, with the class receiving approximately $24 million.

- *In re Structured Settlement Litigation*, a series of consolidated class actions were brought in the Los Angeles Superior Court in which Marc Seltzer served as one of the lead counsel for the plaintiffs. The plaintiffs were parties to structured settlements that resolved their personal injury and wrongful death cases. They were victimized years later by the alleged fraudulent conversion of U.S. Treasury bonds backing their settlements. The litigation was settled for approximately $130 million. More than $100 million was distributed to the class.
- *McGuire v. Dendreon Corp.*, consolidated securities fraud class action cases filed in Seattle federal court in which Marc Seltzer was appointed by the Court to serve as lead counsel for the class. Plaintiffs alleged that defendants had made false and misleading statements about a new drug that the company planned to sell. The case was settled for $16.5 million, with the class receiving approximately $12 million.
- *Clark v. AdvanceMe, Inc.*, a class action brought in Los Angeles federal court challenging financial arrangements with retail merchants under California's laws against usury. Marc Seltzer served as lead counsel for the class. The case was settled for approximately $23.4 million in cash and other economic consideration, with the class receiving approximately $19 million.
- *CLRB Hanson Industries, LLC v. Google, Inc.,* a class action for alleged overcharging for advertising services which was settled for $20 million, with the class receiving $15 million. Marc Seltzer successfully argued the appeal from the judgment approving the settlement before the Ninth Circuit. *See* 465 Fed. Appx. 617 (9th Cir. 2012)
- *In Re Universal Service Fund Telephone Billing Practices Litigation*, an antitrust and breach of contract class action involving more than fifty consolidated cases in which Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled as to one defendant for benefits to the class totaling $25 million, and tried to a verdict as to the remaining defendant. The jury found in favor of defendant on the antitrust claim and returned a verdict in favor of plaintiffs on the breach of contract claim which was affirmed by the Tenth Circuit. The trial court issued numerous published decisions in this matter. *See, e.g., In Re Universal Service Fund Telephone Billing Practices Litigation*, 300 F. Supp.2d 1107 (D. Kan. 2003).
- *Masimo Corp. v. Tyco Healthcare Group L.P.*, an individual antitrust case for monopolization and restraint of trade in which Marc Seltzer served as co-trial counsel for the plaintiff. The case was tried to a verdict resulting in an award in favor of our client. A new trial was granted as to damages. On retrial, the Court awarded approximately $45 million in damages (after trebling). The Ninth Circuit affirmed the liability verdict and damages award. *See* 350 Fed. Appx. 95 (9th Cir. 2009). Our client received a net recovery of

- *White v. NCAA*, an antitrust class action brought in Los Angeles federal court challenging limitations on financial assistance provided by colleges and universities to student athletes. Marc Seltzer served as co-lead counsel for the plaintiff class. The case was settled for benefits netting the class approximately $220 million, plus court-approved attorneys' fees and costs.
- *Livid Holdings, Ltd. v. Salomon Smith Barney, Inc.*, a securities fraud case brought on behalf of an investor in a start up company. Marc Seltzer was retained to represent the plaintiff on appeal following the dismissal of the action by the trial court, and was successful in overturning the dismissal of the case.*See Livid Holdings Ltd. v. Salomon Smith Barney, Inc.*, 416 F.3d 940 (9th Cir. 2005). The case was subsequently settled for a confidential amount.
- *In Motorcar Parts & Accessories Securities Litigation*, fourteen consolidated securities fraud class actions in which Marc Seltzer was appointed by the Los Angeles federal court to serve as lead counsel for the class. The case was settled for $7.5 million. *See Z-Seven Fund, Inc. v. Motorcar Parts & Accessories*, 231 F.3d 1215 (9th Cir. 2000).
- *In re IDB Communications Group, Inc. Securities Litigation*, in which Marc Seltzer served as one of four co-lead counsel appointed by the Los Angeles federal court to represent the plaintiff class in more than twenty consolidated securities fraud class action cases. The case was settled for $75 million.
- *In re Taxable Municipal Bond Securities Litigation*, in which four lawyers, including Marc Seltzer, served on Plaintiffs' Executive Committee, and together with plaintiffs' lead counsel, supervised and managed every aspect of the litigation. This litigation was a consolidated multi-district proceeding brought on behalf of defrauded purchasers of taxable municipal bonds. The case resulted in numerous reported decisions on important recurring issues arising under the federal securities laws. *See, e.g., In re Taxable Municipal Bond Litigation*, [1993 Transfer Binder] Fed. Sec. L. Rep. (CCH) 97,742 (E.D. La. 1993). After several years of intense litigation, the case was settled for approximately $110 million.
- *Cowles v. Gannett Outdoor Co., Inc.*, of Southern California, coordinated class actions brought in Los Angeles federal court for an alleged conspiracy to suppress competition for leases for billboards sites in Southern California in violation of § 1 of the Sherman Act. Marc Seltzer served as co-lead counsel for the class. The case was settled for $6.5 million.
- *Slaven v. B. P. America, Inc.*, a class action brought in Los Angeles federal court on behalf of fishermen and business owners for economic losses suffered as a result of the spill of more than 200,000 gallons of crude oil from a tanker off the coast of Huntington Beach, California that befouled coastal waters and nearby beaches. The case was brought under the Trans-Alaska Pipeline Authorization Act, admiralty law and the law of California, and resulted in several published decisions in the district court and the Ninth Circuit. *See*, e.g., *Slaven v. B. P. America*, Inc., 973 F.2d 1468 (9th Cir. 1992). Marc Seltzer served as co-lead counsel for the class. The case was ultimately settled for $4 million, plus court-approved attorneys' fees and costs.
- *In re Carnation Company Securities Litigation*, consolidated class actions for violation of the federal securities laws brought in Los Angeles federal court. The plaintiffs alleged that false denials were made relating to the potential takeover of Carnation Company by Nestle, S.A., before the merger of the two firms was announced. Marc Seltzer served as co-lead counsel for the class. The case was settled for $13 million.
- *In re International Technology Securities Litigation*, consolidated securities class actions filed in Los Angeles federal court. The plaintiffs alleged that the Company's financial statements were materially misleading for failing to earlier write off or set up appropriate accounting reserves relating to the Company's off-site waste disposal operations. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for $12 million in cash and newly-issued securities.
- *Guenther v. Cooper Life Sciences, Inc.*, a combined stockholders class and derivative action brought in San Francisco federal court for alleged false and misleading statements regarding the Company's products and prospects. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for $9.85 million in cash plus non-cash economic benefits valued at $8.3 million.
- *Heckmann v. Ahmanson,* consolidated class and derivative actions arising out of the alleged "greenmailing" of the Walt Disney Co. by Saul Steinberg. Marc Seltzer was one of the lead counsel for the class of stockholders. The case was settled after three weeks of trial for approximately $60 million. *See Heckmann v. Ahmanson*, [1989 Transfer Binder] Fed. Sec. L. Rep. ¶ 94, 447 (Cal. Sup. Ct. April 12, 1989) (order denying summary judgment).
- *Financial Federation, Inc. v. Ashkenazy*, in which Marc Seltzer and his co-trial counsel successfully defended at trial an anti-takeover case brought by a financial institution in Los Angeles federal court under

the federal securities laws and the RICO statute against persons who allegedly sought to take control of the institution. *See Financial Federation, Inc. v. Ashkenazy*, [1984 Transfer Binder] Fed. Sec. L. Rep. (CCH) 91,489 (C.D. Cal. 1983).

- *Green v. Occidental Petroleum Corp.*, in which Marc Seltzer, together with co-counsel, represented plaintiffs in consolidated securities fraud class action cases that established important precedent in the Ninth Circuit regarding the certification of plaintiff classes and the computation of damages in securities fraud cases. *See Green v. Occidental Petroleum Corp.*, 541 F.2d 1335 (9th Cir. 1976). The case was settled for $12 million.
- *Wool v. Tandem Computers, Inc.*, a securities fraud class action in which Marc Seltzer played a leading role. One of the notable achievements in this case was a victory for the plaintiffs in the Ninth Circuit which established important precedent concerning the measure of damages recoverable in federal securities fraud class action cases, the standard for "controlling person" liability under the federal securities laws and the requirements for pleading fraud with the particularity specified under Rule 9(b), Fed.R. Civ. P. *See Wool v. Tandem Computers, Inc.*, 818 F.2d 1433 (9th Cir. 1987). Following the issuance of the Ninth Circuit's decision, the case was settled for $16.5 million.
- *Plaine v. McCabe*, a securities class action, in which Marc Seltzer argued before the Ninth Circuit, obtaining a substantial victory for plaintiffs, and establishing significant precedent in the Ninth Circuit regarding the standards for liability and remedies for violations of tender offer disclosure rules under the federal securities laws. *See Plaine v. McCabe*, 797 F.2d 713 (9th Cir. 1986).
- *Biben v. Card*, consolidated securities fraud class actions where Marc Seltzer served as co-lead counsel for plaintiffs. The plaintiffs achieved substantial pretrial victories, including establishing the validity of their claims under the federal securities laws against the defendants in that case. *See Biben v. Card*, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,010 (W.D. Mo. 1985), on denial of motion for reconsideration, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,083 (W.D. Mo. 1985). The case settled for approximately $12 million.
- *Sanwa Bank California v. Facciani*, where Marc Seltzer was co-lead counsel for a plaintiff class in which settlements totaling approximately $26 million in cash were obtained on behalf of defrauded investors who were victimized by an alleged Ponzi scheme.
- *In re California Indirect-Purchaser Infant Formula Antitrust Class Action Litigation*, comprised of several consolidated consumer class actions brought for alleged price-fixing of infant formula products. Marc Seltzer was appointed by the Court to serve as one of two co-lead counsel for plaintiffs and the class. The case was settled for approximately $20 million.
- *Small v. Sunset Park*, where Marc Seltzer was lead counsel for a class of investors involving an alleged Ponzi scheme in which settlements totaling more than $16.8 million were achieved ($11.8 million net to the class), including $12 million paid in settlement by a then "Big Five" accounting firm.
- *In re Applied Magnetics Corporation Securities Litigation*, consolidated securities fraud class actions, filed in Los Angeles federal court, where Marc Seltzer was appointed co-lead counsel for the class. Plaintiffs successfully defended against defendants' motion to dismiss plaintiffs' consolidated complaint. *See In re Applied Magnetics Corp. Sec. Litig.*, [1994-1995 Transfer Binder] Fed. Sec. L. Rep. (CCH) ¶ 98,345 (C.D. Cal. 1994). The case was subsequently settled.
- *Schneider v. Traweek*, federal and state court securities fraud class actions in which Marc Seltzer served as lead counsel for the plaintiffs. Significant victories were obtained on plaintiffs' behalf in defeating motions to dismiss and in obtaining class certification. *See Schneider v. Traweek* [1990 Transfer Binder] Fed. Sec. L. Rep. (CCH) 95,419 and 95,505 (C.D. Cal. 1990). The case was settled for approximately $14 million, $10.8 million net to the class.
- *Johnson v. Boston*, where Marc Seltzer was co-lead counsel for a nationwide class of investors in promissory notes victimized by an alleged Ponzi scheme. Approximately $20 million in settlements were obtained for the defrauded investors.
- *Lilienthal v. Levi Strauss & Co.*, an individual minority shareholder's action for alleged breach of fiduciary duty by the majority owners, which resulted in a judgment after trial for the plaintiff providing for a recovery in excess of $3 million. Plaintiff subsequently collected more than $2 million net of attorneys' fees. Marc Seltzer was co-trial counsel for the plaintiff with Jack Corinblit.

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Overview

Named one of California's Lawyer Attorneys of the Year in 2017 and selected as "Top Plaintiff Lawyers in all of California" in 2016 and 2017 by *The Daily Journal*, Steven Sklaver has secured substantial litigation victories for both plaintiffs and defendants. For plaintiffs, Sklaver was lead counsel for a certified class of insurance policy owners, helping them achieve what the Court in the Southern District of New York described as "the best settlement pound for pound for the class that I've ever seen." You can read the Court's statement in full here. You can also read more about the case in The Deal's profile on the litigation here. Sklaver was also lead trial and appellate counsel for investors against an insurance company that resulted in a complete victory and full pay-out of a $20 million life insurance policy. A copy of the appellate court decision is available here. To listen to Sklaver's appellate oral argument, click here. That matter was the feature cover story of the April 2012 California Lawyer.

Sklaver also represents the former members of the legendary rock group The Turtles in ***Flo & Eddie, Inc. v. Sirius XM Radio, Inc.*** (C.D. Cal.) in a certified class action lawsuit against Sirius XM that settled less than 48 hours before the jury trial was scheduled to begin. Sirius XM agreed to pay at least $25.5 million (over $16 million after fees and expenses) and royalties under a 10-year license that is valued up to $62 million (over $41 million after fees and expenses) as compensation for publicly performing without a license Pre-1972 sound recordings. The settlement was approved by the Court, and has received widespread media coverage from publications such as The New York Times, Billboard, The Hollywood Reporter,Law360, Rolling Stone, Variety, Reuters and Managing IP.

Within six months after the Sirius XM class action settled, so did Sklaver's copyright class action brought on behalf of artists owed mechanical royalties for compositions made available by Spotify, the leader in digital music streaming. Spotify agreed to a class action settlement valued at over $112 million (over $95 million after fees and expenses), a settlement for which the district court granted final approval and remains subject to a pending appeal. You can read more about this matter in *Billboard*.

Sklaver's many significant and widely covered class action results in 2016 helped secure Susman Godfrey's recognition as *Law360*'s "Class Action Group of the Year" in early 2017. You can read that article announcing the award here.

For defendants, Sklaver has handled numerous employment class actions across the country. He served, along with the Managing Partner of Susman Godfrey, as trial counsel for Wal-Mart, the world's largest retailer, trying a large employment class action in California. He also successfully defended and defeated class certification in numerous, substantial wage and hour matters for Alta-Dena Certified Dairy, LLC, dairy producers for Dean Foods, one of the leading food and beverage companies in the United States.

Copies of the pro-employer decisions are available here, here, and here.

Sklaver has tried complex commercial and class action disputes — including jury trials and bench trials in federal and state court, as well as arbitrations. Sklaver graduated cum laude from Dartmouth College, magna cum laude and Order of the Coif from Northwestern University School of Law, and clerked for Judge David Ebel on the United States Court of Appeals for the Tenth Circuit. Sklaver also won the National Debate Tournament for Dartmouth College, and is just one of four individuals in debate history to win three national championships at the high school and collegiate level. From 2010-2017, Sklaver has been recognized every year as a "Super Lawyer" in Southern California, awarded to no more than the top 5% of the lawyers in the state of California (Law & Politics Magazine, Thomson Reuters).

Sklaver currently serves on the Board of Directors for the Western Center on Law & Poverty, the Los Angeles Metropolitan Debate League, and the Association of Business Trial Lawyers. Sklaver was also selected as the 2016-2017 Ninth Circuit Judicial Conference Lawyer Representative.

Education

- Dartmouth College (B.A., *cum laude*)
- Northwestern University School of Law (J.D., *magna cum laude* and Order of the Coif)

Judicial Clerkship

Law Clerk to the Honorable David M. Ebel, United States Court of Appeal for the Tenth Circuit

Honors and Distinctions

- Named one of California's Lawyer Attorneys of the Year in 2017 by *The Daily Journal.* Click here for a photo of Sklaver, along with co-counsel, receiving the award.
- Selected as 1 of the 30 Top Plaintiff Lawyers in all of California in 2016 by *The Daily Journal*
- 2010-2018 listings of Southern California "Super Lawyers" awarded to no more than the top 5% of the lawyers in the state of California (Law & Politics Magazine, Thomson Reuters)
- Northwestern Law Review member and editor
- National Debate Tournament (NDT) collegiate championship winner

Articles and Speeches

"Federal Power to Commandeer State Courts: Implications for the Theory of Judicial Federalism," 32 Ind. L. Rev. 71 (1998) (with Martin H. Redish, Professor, Northwestern University School of Law).

Speaking Engagements

- "Compliance Track: Cost of Insurance Litigation Overview" – The 24th Annual Fall Life Settlement and Compliance Conference (Orlando, Florida)
- "Cost of Insurance" – The Life Settlements Conference 2018 (New York City, NY)
- "Cost of Insurance: What Has Been Filed and Decided and What Will Happen Next?" Anticipating

- "Current COI Increases – What's it All About? The Legal Perspective." ReFocus2017 Conference (Las Vegas, NV)
- "Litigation Update: Will the Arthur Kramer Insurable-Interest Decision Lift the Cloud Over Much of the Litigation in the Market?" The 2011 International Life Settlements Conference (London, England)
- "Seeking Interlocutory Appellate Review of Class-Certification Rulings: Tactics, Strategies, and Selected Issues." Bridgeport 10th Annual Class Action Litigation Conference (Los Angeles, CA)
- PwC 2010 Securities Litigation Study Luncheon. (Los Angeles, CA)
- Life Settlement Litigation Update. 2010 Life Settlement Compliance Conference and Legal Round Table (Atlanta, GA)
- "Litigation: What are the Legal Trends Affecting the Market?" The Life Settlements Conference 2010 (Las Vegas, NV)

Professional Associations and Memberships

- United States Supreme Court
- United States Court of Appeals for the Ninth and Tenth Circuits
- United States District Courts for the Central, Southern, Northern, and Eastern Districts of California and District of Colorado
- Admitted to state bars of Illinois, Colorado, and California
- Board of Directors, Los Angeles Metropolitan Debate League
- Board of Directors, Western Center on Law & Poverty

Notable Representations

Class Actions

- ***Copyright Infringement:*** Sklaver serves as co-lead counsel with the Gradstein & Marzano firm representing Flo & Eddie (the founding members of 70's music group, The Turtles) along with a class of owners of pre-1972 sound recordings for copyright violations by music provider Sirius XM. The day before trial was to commence before a California jury in federal court in late 2016, Flo & Eddie reached a landmark settlement with Sirius XM on behalf of the class in a deal potentially worth $99 million. The Court granted final approval of the settlement in May 2017. Click here for more. Sklaver with his co-leads were recently named "California Lawyer Attorneys of the Year" by *The Daily Journal* for their outstanding legal work on this case.
- In May 2017, Sklaver, as co-lead counsel with Gradstein Marzano, secured a deal valued at$112 million to settle a class-action lawsuit with Spotify brought on behalf of music copyright owners. The suit alleged that Spotify made music available online without securing mechanical rights from the tracks' composers. Under the terms of the deal, Spotify will pay songwriters $43.45 million for past royalties, as well as commit to pay ongoing royalties that are valued at $63 million. Read more about the case here and see Billboards coverage of it here.

- ***Insurance***: In a seminal insurance class action filed in the Southern District of New York, resolved in September 2015, Mr. Sklaver served as lead counsel in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final Pretrial Conference — less than two months before trial. Settlement terms included: $48.5 million cash fund ($34 million after fees and expenses), COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded, ***"I want to say publicly that I think this is an excellent settlement. I think this is a superb – this may be the best settlement pound for pound for the class that I've ever seen."*** You can read the

statement in full on page 3 here. You can also read more about the case in *The Deal's* feature on the matter here.

- ***Antitrust:*** *In In re Automotive Parts Antitrust Litigation.* In the largest price-fixing cartel ever brought to light, Mr. Sklaver and a team of Susman Godfrey lawyers run a massive MDL litigation in which the firm serves as co-lead counsel for a class of consumer plaintiffs in multidistrict price-fixing cases pending in a Detroit, Michigan federal court. The actions, alleging anti-competitive conduct, were brought by indirect purchasers of component parts included in over 20 million automobiles, and involve parts such as wire harnesses, instrument panel clusters, fuel senders, heater control panels and alternators.

  The Department of Justice has imposed fines exceeding $2.6 billion pursuant to guilty plea agreements with some of the defendants, and its investigation is still ongoing. The Susman Godfrey team together with its co-lead counsel has defeated multiple motions to dismiss. Settlements have been reached with a certain defendants for a combined $620 million thus far. Final settlement (after fees and expenses) has not yet been determined. The case remains ongoing against the remaining defendants.

LIFE SETTLEMENTS

- Represented Jonathan Berck, as Trustee of the Rosamond Janis Insurance Trust in a $5 million rescission claim brought by the Lincoln Life and Annuity Company of New York for alleged violations of New York's insurable interest laws and other "STOLI" (stranger originated life insurance) related claims. RESULT: Summary judgment granted in favor of my client. A copy of the summary judgment order is available here.
- Won reversal in a $20 million life settlement rescission lawsuit against Lincoln Life & Annuity Company of New York. Lincoln's lawsuit was based on allegations that the insurance policies lacked an insurable interest because they were procured by third-parties for investment purposes and because there were net worth and other misrepresentations in the applications. The appellate court ordered that the trial court enter judgment in favor of the trust. The appellate court also affirmed our trial court victory that Lincoln's fraud claim was time barred because the policies were incontestable. The case is Lincoln Life & Annuity Co. of New York v. Jonathan Berck, as Trustee of the Jack Teren Insurance Trust, Court of Appeal Case No. D056373 (Cal. Ct. App. May 17, 2011). A copy of the appellate court decision is available here. To listen to Mr. Sklaver's appellate oral argument, click here. The *Teren* case was the feature, cover story of the April 2012 *California Lawyer*.
- Represents investors, trusts, trustees, brokers, and insureds in life settlement and STOLI litigation across the country against insurance companies seeking to rescind policies with face values worth more than $125 million. Mr. Sklaver is also a frequent speaker and commentator on life settlement and STOLI litigation, in both trade publications and conferences.

FINANCIAL FRAUD

- Represented Royal Standard Minerals, which was the plaintiff in a federal securities lawsuit against a "group" of more than ten dissident shareholders for failing to file Schedule 13-D disclosures. RESULT: Preliminary injunction granted and final judgment entered that, among other things, required for three years the votes of all shares owned by any of the defendants to be voted as directed by the Board of Directors of my client.
- Represented plaintiff who held millions of WorldCom shares as an opt-out to the class in In re WorldCom Securities Litig. RESULT: Settled on confidential terms.
- Represented plaintiff Accredited Home Lenders in a TRO and breach of contract action over a wrongful default declared by Wachovia in a credit re-purchase agreement. RESULT: The case was resolved favorably, following the entry of a TRO.
- Represented Walter Hewlett in his challenge to the Hewlett-Packard/Compaq merger. In preparation for that trial, Mr. Sklaver deposed Compaq's former CEO Michael Capellas about his famous handwritten journal note which, describing the merger, stated "at our course and speed we will fail." Mr. Capellas was right.

EMPLOYMENT

- Represented one of the world's largest retailers in the defense of a four month long jury trial, wage and hour class action pending in California. One of the world's largest retailers appointed Susman Godfrey L.L.P. to be its national trial counsel for wage and hour litigation.

ANTITRUST

- Lead day-to-day lawyer for the class in White, et al. v. NCAA, a certified, antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. ESPN Magazine coverage of the lawsuit may be found here. RESULT: The NCAA settled and paid an additional $218 million for use by current student-athletes to cover the costs of attending college, paid $10 million to cover educational and professional development expenses for former student-athletes, and enacted new legislation to permit Division I institutions to provide year-round comprehensive health insurance to student-athletes.

ENTERTAINMENT

- Represented NAACP image award winner Morris Taylor "Buddy" Sheffield in his breach of contract lawsuit against ABC Cable Networks Group regarding the creation of Hannah Montana. RESULT: Defendant settled less than four weeks before trial.

PRO BONO

- Appointed to represent Carl Petersen, who was charged by the United States Attorney's Office with being a felon in possession of a firearm — a charge that carries a five-year prison sentence and an 89% conviction rate. RESULT: Acquittal. Jury deliberation lasted less than four hours. ?

  Appointed by the United States Court of Appeals for the Tenth Circuit as appellate counsel in five cases, including: United States v. Petersen; United States v. Blaze (specifically noting Mr. Sklaver's "good workmanship"); and Sorrentino v. IRS (appointed as amicus curiae by and for the Court)

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Overview

Ms. Srinivasan tries high-stakes cases for plaintiffs and defendants in courtrooms across the country. A partner in the Los Angeles office and a member of the firm's Executive Committee, she has secured significant victories for her clients in antitrust, patent, trade secret, copyright, class action, and other disputes.

Ms. Srinivasan won a $706.2 million jury verdict for client HouseCanary in a misappropriation of trade secret, fraud and breach of contract case. As co-lead counsel, Ms. Srinivasan played a crucial role in this landmark win. Read more on the win here or see the case featured on Law360's "How They Won It" series.

Ms. Srinivasan recently obtained court approval for a class action settlement valued at over $100 million with music streaming service, Spotify. The deal resolved claims of copyright infringement. She currently serves as Court-appointed co-lead counsel for a certified class of hundreds of millions of consumers impacted by Qualcomm's anticompetitive conduct in the sale of chipsets used in mobile devices and its patent licensing practices.

In 2019, Ms. Srinivasan was named on the Lawdragon 500 – Lawdragon's list of the leading 500 lawyers in America. Ms. Srinivasan has also been named one of the "Top 100 Lawyers" in California by the *Daily Journal* along with one of the state's "Top IP Lawyers." The *National Law Journal* named Srinivasan an Elite Woman of the Plaintiff's Bar in 2018 (ALM). Also in 2018, *Law360* called Srinivasan an Intellectual Property MVP. She was recently awarded the Cornerstone Award by the South Asian Bar Association of North America for her dedication to furthering the professional development of the South Asian legal community. In 2018, she was named an Intellectual Property Trailblazer by the *National Law Journal* (ALM). In 2017, she and her co-counsel received the "California Lawyer Attorneys of the Year" (CLAY) award for their work in *Flo & Eddie Inc. v. Sirius XM Radio Inc.*, a copyright class action involving pre-1972 sound recordings. Ms. Srinivasan was named a "2017 Power Lawyer" by *The Hollywood Reporter*. She also has been recognized as a "Trailblazer" by The South Asian Bar Association of Southern California. *The Recorder* has included her on their Leaders in tech Law list for three straight years – in 2016, 2017 and 2018 (ALM). She was also named one of the *Daily Journal's* "Top Women Lawyers" for three consecutive years – in 2016, 2017 and 2018. *The National Law Journal* called Ms. Srinivasan one of the nation's 75 Outstanding Women Lawyers. Additionally, Srinivasan's many significant class action and intellectual property achievements helped secure Susman Godfrey's recognition as a *Law360* "Class Action Group of the Year" in 2018 and an "Intellectual Property Group of the Year" in 2019.

the California State Bar, which vets the governor's potential judicial candidates. She has taught a course on Class Actions at UCLA Law School. Ms. Srinivasan sits on the Board of the Western Justice Center and has previously served on the executive committee of the South Asian Bar Association of North America. She is a member of the California Bar Foundation. Before becoming a lawyer, Ms. Srinivasan reported for The Associated Press in Washington D.C., covering national media and telecommunications policy. Read all about her prior career here. "From AP to IP" (Super Lawyers, 2017, Thomson Reuters).

Education

- Yale University, B.A. (cum laude), Comparative Literature/Ethics, Politics & Economics
- Stanford University, J.D. (with distinction)
  - Winner Marion Rice Kirkwood Moot Court Competition
  - Editor, Stanford Law Review

Judicial Clerkship

Judge Raymond C. Fisher, U.S. Court of Appeals for the Ninth Circuit.

Articles and Speeches

Prior Speaking Engagements

- American Antitrust Institute Competition Roundtable: Challenging Monopolies in Court -Where Have We Been and Where Are We Going? Panel 1: The Current State of Monopolization Law and Enforcement, March 14, 2019, Washington D.C.
- ABA Professional Success Summit – Networking and Advancement for Racially and Ethnically Diverse Litigators – Working With Witnesses, November 2018, Houston, TX.
- ABA Section Annual Conference, Cross Examination Showdown, May 2, 2018. See a picture from the event here.
- Top Trial Attorneys' Tips & Techniques, Arab American Lawyers Association & South Asian Bar Association of Southern California, November 29, 2017, Los Angeles, CA.
- Mediation in Class Actions. CLE International: Class Actions Law Conference, November 8, 2017, Los Angeles, CA
- Advanced Mediation Advocacy for IP Cases. ABA Section of IP Law IP West. October 11, 2017, Long Beach, CA.
- Managing the Need for Expedited Relief in Motion. Association of Business Trial Lawyers, 44th Annual Seminar, October 7, 2017, Carlsbad, CA.
- Gender Issues in the Courtroom – Bridgeport Continuing Education. August 18th, Los Angeles, CA. Click here for more.
- Fundamentals of Trade Secret Litigation: The DTSA, Section 337 at the ITC, and More. July 18th, 2017. Webinar on Behalf of The American Bar Association. Click here for more.
- 14th Annual South Asian Bar Association Convention – Washington D.C., "Wrangling Witnesses – Real World Advice on Successful Depositions" Click here for photo from the event.
- 2017 Class Action Litigation Conference – Los Angeles; April 7,2017. Click here for more information.
- South Asian Bar Association – "Women in Tech" Panel; Wednesday, February 8, 2017, 6:00pm 8:00pm. Click here for more information.
- Bid-Rigging without Borders: What's Next in International Cartel Investigations?, ABA International Law Meeting, Tokyo, Japan, October 19, 2016.
- Argument in Support of Certification on Behalf a Direct Purchaser Class Before the Hon. Judge Susan

for agenda and photo.

- How to Climb into Any Jury Box, State Bar of California, Annual Meeting, Monterrey, California, October 2012.

- Stop the Presses! Litigating Cases Tried in the Courtroom and the Court of Public Opinion, National South Asian Bar Association annual meeting, Philadelphia, June 30, 2012.
- How Much is This Going to Cost Me? Best Practices in Alternative Fee Arrangements, International Bar Association, May 10, 2012, New York.
- Managing Wage & Hour Risks 2012, Trial of Collective and Class Actions, Practising Law Institute, New York, February 13, 2012.
- How to Prepare for The Big Event: Trial (The Last 90 Days), Women Antitrust Plaintiffs' Attorneys, Minneapolis, October 2010.
- Moot Court Argument: *United States v. Bhagat Singh Thind*, North American South Asian Bar Association, Boston, June 2010.

Professional Associations and Memberships

- Ms. Srinivasan served as a commissioner on the Judicial Nominees Evaluation Commission of the California State Bar, which vets the governor's potential judicial candidates.
- Ms. Srinivasan sits on the board of California Change Lawyers, which aims to promote access to justice for underrepresented communities in California.
- Ms. Srinivasan sits on the board of the Western Justice Center, an organization of judges, lawyers and civic leaders that promote research and legal education on alternative forms of dispute resolution and justice reform.
- Ms. Srinivasan is a fellow of the American Bar Foundation.
- Ms. Srinivasan previously served on the executive boards of the South Asian Bar Association of North America and of Southern California.

Notable Representations

Intellectual Property

- ***Title Source Inc v. HouseCanary:*** Serving as co-lead counsel, Srinivasan secured a landmark jury verdict of $706.2 million for real estate analytics company HouseCanary in a misappropriation of trade secret, fraud and breach of contract case against Title Source Inc. At the conclusion of the seven-week trial, a 12-person jury found unanimously in favor of HouseCanary. This case was covered by *Law360*, the *Wall Street Journal*, *Bloomberg* and *Texas Lawyer*. Read more about it here.
- ***Melissa Ferrick et al v. Spotify USA Inc. et al:*** Ms. Srinivasan, along with co-lead counsel from Gradstein & Marzano, secured a deal worth over $100 million to settle a class-action lawsuit with music streaming service, Spotify, brought on behalf of music copyright owners. The suit alleged that Spotify made music available online without securing mechanical rights from the tracks' composers. Click here for more. The court granted final approval in early 2018.
- ***Flo & Eddie v. Sirius XM:*** Ms. Srinivasan serves as co-lead counsel with the Gradstein & Marzano firm representing Flo & Eddie (the founding members of 70's music group, The Turtles) along with a class of owners of pre-1972 sound recordings for copyright violations by music provider Sirius XM. Flo & Eddie settled with Sirius XM on behalf of the class in a deal worth up to $73 million and approved by the Court in May 2017, Srinivasan and her co-leads were recently named "California Lawyer Attorneys of the Year" by *The Daily Journal* for their legal work on this case.
- ***Trianni, Inc. v. Former Employees***: Ms. Srinivasan served as lead counsel in this trade secret misappropriation case brought by biotechnology company Trianni related to its transgenic mouse platforms.

and trade secret cases involving wearable devices against competitor Fitbit in the International Trade Commission and the Northern District of California.

- ***ZiiLabs v. Samsung***: Ms. Srinivasan represented ZiiLabs, a subsidiary of the Singapore-based media company Creative Technologies Ltd. Ziilabs brought claims for patent infringement of its patents related to graphics processing technology developed originally by 3DLabs. The case settled on the eve of trial after Apple had taken a license.
- ***GPNE v. Apple:*** Ms. Srinivasan represented telecommunications company GPNE in its patent infringement case against Apple's iPhones and iPads. A jury found GPNE's patents valid but not infringed. Ms. Srinivasan delivered opening arguments as described here.
- ***MicroUnity v. Apple***: Ms. Srinivasan represented MicroUnity Systems Engineering, Inc., one of the leading innovators in the microprocessor industry, in its patent infringement lawsuit against Apple, Samsung and major players in the smartphone and tablet industry. The claims arose from infringement of patents covering "mediaprocessor" technology. The case settled with the last of the defendants taking licenses just shortly before trial.
- ***PalTalk v. Sony and Activision***: Ms. Srinivasan represented PalTalk Holdings, Inc., the nation's premiere Internet video chat community, in its patent infringement lawsuit against Sony's World of Warcraft, Activision Blizzard's Call of Duty and other video game offerings. The case settled before trial after PalTalk received a favorable Markman ruling.
- ***PalTalk v. Microsoft***: Ms. Srinivasan prosecuted PalTalk's patent claims against Microsoft Corporation for its Xbox video game offerings, culminating in a March 2009 jury trial in U.S. District Court for the Eastern District of Texas. The parties settled on the fourth day of trial – following Ms. Srinivasan's cross-examination of Microsoft's first witness – with Microsoft agreeing to take a license to the two PalTalk patents for a confidential sum of money. For more about the case, click here.

Antitrust

- ***In re Qualcomm:*** Ms. Srinivasan was appointed by the Court as interim co-lead counsel in this multi-district litigation on behalf of a putative class of purchasers impacted by Qualcomm's anti-competitive conduct
- ***In re Lithium Batteries:*** Ms. Srinivasan and a team of Susman Godfrey lawyers serve on the executive committee representing a class action lawsuit brought on behalf of consumers/end purchasers of lithium ion batteries found in products such as laptops, tablets, mobile phones, and digital cameras.
- ***Tessera Technologies, Inc. v. Hynix Semiconductor, Inc.***: Ms. Srinivasan represented Tessera in its antitrust claims against DRAM manufacturer Hynix involving Tessera's patented semiconductor packaging technology. The parties entered into a confidential settlement in December 2012

Other Class Actions

- ***Johnston v. Rawlings***: Ms. Srinivasan won a defense-side jury verdict on behalf of The Rawlings Company in a closely watched certified class action challenging the company's classification of its employees. During the three-week jury trial in Kentucky state court, Ms. Srinivasan conducted the examination of company executives and expert witnesses and cross-examined a class representative. The jury verdict was featured in the American Lawyer. For more about the case, click here.
- ***December 2007***: Ms. Srinivasan and a team of Susman Godfrey lawyers litigated to verdict a three-month class action representing the nation's largest retailers in Minnesota state court. At trial, Ms. Srinivasan conducted the direct and cross examinations of more than a dozen witnesses.

Honors and Distinctions

Named one of the 500 Leading Lawyers in America by *Lawdragon* (2019)

Named an Intellectual Property MVP by *Law360* (2018)

Named one of the 2018 Women Leaders in Tech Law by *The Recorder* (ALM Media Properties, LLC). Click here for a picture of Srinivasan at the honoree event.

Selected as an outside counsel nominee for *Los Angeles Business Journal's* 2018 Leaders in Law Awards (Los Angeles Business Journal)

Named one of *National Law Journal's* Elite Woman of the Plaintiff's Bar (ALM, 2018)

Awarded the Cornerstone Award by the South Asian Bar Association of North America (2018)

Named a "Top Woman Lawyer in California" by the *Daily Journal* in 2018 (Daily Journal Corp.)

Named an Intellectual Property Trailblazer by the *National Law Journal* (ALM, 2018)

Profiled by Super Lawyers (Thomson Reuters, 2018) in the article, "From AP to IP: The Skills Kalpana Srinivasan Learned as a Reporter Help with High Stakes Litigation"

Named one of the 2017 "Top 100 Lawyers" in California by the *Daily Journal* (Daily Journal Corp).

Named a 2017 "Top IP Lawyer" by the *Daily Journal* (Daily Journal Corp).

Named one of the 2017 Women Leaders in Tech Law by *The Recorder* (ALM Media Properties, LLC).

Named one of the Top Women Lawyers in California by the *Daily Journal* in 2017 (Daily Journal Corp). Click here for a photo of Srinivasan and colleague at the awards ceremony.

Named a 2017 Power Lawyer by *The Hollywood Reporter.*

Named a 2017 California Lawyer of the Year by the *Daily Journal (Daily Journal Corp).* Click here for a photo of Srinivasan, along with co-counsel, receiving the award.

Recipient of the 2017 Trailblazer Award by South Asian Bar Association of Southern California (March 2017). Click here for more on the event and here for a photo of Srinivasan accepting her award.

Named as one of the 2016 Women Leaders in Tech Law by *The Recorder* (ALM Media Properties, LLC). Click here for more.

Named on of the *The National Law Journal's* Outstanding Women Lawyers (ALM Media Properties, LLC). Click here for NLJ's profile.

Recognized as a "Powerbroker" by *Law 360*. Click here to view the article.

Named by the *Los Angeles and San Francisco Daily Journal* as one of California's top 20 lawyers under

the age of 40. Click here to view the article.

Named by the National Asian Pacific American Bar Association (NAPABA) as one of the "Best Lawyers Under 40". Click here to view the article.

Featured in the *Minority Corporate Counsel Association* magazine. Click here to view the article.

Recognized in Super Lawyer's 2017 Special Issue "Southern California's Women Super Lawyers" by *California Law & Politics* magazine (Thomson Reuters)

Recognized as a Super Lawyer in 2016 – 2019 by *California Law & Politics* magazine (Thomson Reuters) – an honor awarded to the top 5% of lawyers in the Southern California area.

Recognized as a Rising Star in 2013, 2014 and 2015 by *California Law & Politics*magazine (Thomson Reuters) – an honor awarded to the top 2.5% of lawyers in the Southern California area.

Named to the inaugural Hot List Issue by *Lawyers of Color.* See profile here.

SUSMAN GODFREY L.L.P.



Kathryn P. Hoek

Partner

Los Angeles
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khoek@susmangodfrey.com

Overview

Ms. Hoek is a partner in the firm's Los Angeles office. She is the Chair of the firm's Diversity Committee and serves on the Employment Committee, and she previously served on the firm's Executive Committee. Ms. Hoek is particularly proud of her efforts to increase the hiring and retention of women and diverse lawyers at the firm. In addition to her work at the firm, Ms. Hoek teaches Depositions at UCLA Law School.

In her work for clients, Ms. Hoek represents plaintiffs and defendants in a broad range of business litigation matters, including contract disputes, patent and other intellectual property matters, employment and wage and hour litigation, class actions, antitrust cases, insurance cases and securities litigation. Based on her successful representation of clients in multiple practice areas, Ms. Hoek was named a "Super Lawyer" from 2014-2018 by Southern California Super Lawyers and a "Rising Star" from 2006-2008 and 2011-2013. Ms. Hoek was also recognized in Super Lawyer's special Issue "Southern California's Women Super Lawyers" in 2017 and 2018 (*California Law & Politics Magazine*, Thomson Reuters).

Education

- Yale University (B.A. with Honors and Distinction in Major, *summa cum laude*, 1997)
  - Phi Beta Kappa
  - Rita Lipson Cup (awarded for intellectual growth, personal maturity, and active consideration for others)
  - Mildred Priest Frank Memorial Prize in Sociology
- Yale Law School (J.D. 2001)
  - Yale Law School Coker Fellow (fellowship to teach legal writing)

Judicial Clerkship

Law Clerk to The Honorable Lee H. Rosenthal, United States District Court for the Southern District of Texas (2001-2002)

Professional Associations and Memberships

- State Bar of California
- Admitted to Practice in Ninth Circuit, Federal Circuit, and United States District Courts for the Central and

- Women Lawyers Association of Los Angeles
- Federal Bar Association
- Association of Business Trial Lawyers
- Beverly Hills Bar Association

Notable Representation

- *NRG Renew LLC v. SunPower Corporation, Systems* (Superior Court of California, County of Contra Costa) (2014 – present). Ms. Hoek represents SunPower Corporation, Systems in this complex litigation matter involving indemnification and breach of contract claims arising from the financing and construction of one of the world's largest solar power plants, California Solar Valley Ranch (CVSR).
- *Dial Corporation, et al. v. News Corporation, et al.* (United States District Court, Southern District of New York) (present). Ms. Hoek represents a class of retailers in this antitrust class action in which the retailers accuse News America of violating the antitrust laws by maintaining a monopoly in the market for in-store promotion services, engaging in unlawful exclusive dealing arrangements, and extracting artificially high prices.
- Ms. Hoek represented the world's largest retailer in some of the largest wage and hour class actions ever brought in several states across the country, during which Susman Godfrey acted as national trial counsel.
- *Tessera Technologies, Inc. v. Hynix Semiconductor , Inc., et al.* (Superior Court of California, County of San Francisco) (2007-2012). Ms. Hoek represented the plaintiff Tessera in this antitrust action against DRAM manufacturer Hynix. Tessera alleged that Hynix conspired with several other DRAM manufacturers to boycott and suppress the adoption of Tessera's patented semiconductor packaging technology designed for use with the revolutionary memory chip technology known as RDRAM. Tessera successfully opposed the defendants' motion for summary judgment as to its antitrust claims, and the parties entered into a confidential settlement in December 2012.
- Ms. Hoek represented the world's largest retailer in a major multi-district antitrust class action pending in the United States District Court for the Northern District of California. The case was brought by current and former subscribers to online DVD rental services who asserted claims for illegal market allocation and attempted monopolization of the home entertainment market. The Court granted summary judgment dismissing the claims of one group of subscribers. SG negotiated a favorable settlement for its client as to the remaining group of subscribers.
- *Watts v. Sysco Corp., et al.* (Superior Court of California, County of Alameda) (2010-2011). Ms. Hoek represented Sysco Corp. and several California subsidiaries in a labor dispute in which the plaintiffs sought to assert class wide claims to recover business expenses and late wage penalties under California law. Ms. Hoek negotiated a favorable settlement for her client, which was approved in September 2011.
- *MicroUnity Systems Engineering, Inc. v. Intel and Dell* (United States District Court, Eastern District of Texas) (2005). Susman Godfrey brought this patent infringement case on behalf of its client MicroUnity against Intel and Dell. The complaint alleged that Intel's Pentium III, Pentium 4, and Pentium M processors, and Dell's use of those processors, infringed several MicroUnity patents covering mediaprocessor technology. Ms. Hoek handled discovery and developing the damages case. Just weeks before trial, the parties reached a confidential settlement, the financial terms of which Intel disclosed in its Third Quarter 2005 10-Q. National media reported on the significance of the case, including articles in the New York Times, the Wall Street Journal, and several technology news outlets.
- *MicroUnity Systems Engineering, Inc. v. Sony* (United States District Court, Eastern District of Texas) (2005-2007). Susman Godfrey also represented MicroUnity in this patent infringement case against Sony, alleging that Sony's PlayStation 2 and PlayStation Portable (PSP) game systems infringed MicroUnity's patents covering mediaprocessor and memory controller technology. Ms. Hoek again handled discovery and damages issues. The parties reached a confidential settlement in the Fall of 2007.
- *Livid Holdings, Ltd. v. Salomon Smith Barney, Inc., et al.* (United States District Court, Western District of Washington) (2005-2006). In this securities lawsuit, plaintiff Livid sued the successor-in-interest to Schroeder's & Co., Inc., and several managing directors, alleging that it had relied on a Schroeder's prospectus which contained false and misleading statements in violation of Section 10(b) and Rule 10b-5. Livid hired Susman Godfrey after the trial court dismissed its complaint. Susman Godfrey successfully

Salomon Smith Barney, Inc., et al., 416 F.3d 940 (9th Cir. 2005)), and Ms. Hoek successfully opposed a petition for rehearing en banc. Following remand to the trial court and after substantial discovery, the parties reached a confidential settlement.

- *Stark v. Shapell Industries, Inc.* (Superior Court of California, County of Los Angeles) (2005-2007). Susman Godfrey brought this class action on behalf of named plaintiff Allan Stark and others similarly situated who purchased homes from Shapell Industries, Inc. The complaint alleged that Shapell required purchasers to use Shapell's in-house escrow services as a condition of the purchase of a new home, in violation of California law. Ms. Hoek successfully argued in the Court of Appeal and defeated an extraordinary writ proceeding resulting in a published opinion on an issue of first impression of importance to California class action jurisprudence (See *Shapell Industries, Inc. v. Superior Court*, 132 Cal.App.4th 1101 (2005)). After obtaining class certification over vigorous opposition and defeating summary judgment, we reached a confidential settlement on behalf of the class.

SUSMAN GODFREY L.L.P.



Lindsey Godfrey

Partner

Seattle
(206) 516-3832
lngodfrey@susmangodfrey.com

Overview

Lindsey Godfrey Eccles is a partner in Susman Godfrey's Seattle office. She represents both plaintiffs and defendants in complex, high-stakes civil litigation including patent infringement, antitrust, fraudulent transfer, and professional negligence, as well as a variety of commercial disputes. In addition to individuals, her clients have included nationwide consumer classes, local internet companies, and large U.S. and foreign financial institutions, among others.

From 2004 to 2009 Ms. Eccles oversaw litigation in-house at RealNetworks, Inc. During her tenure Real settled its landmark antitrust suit against Microsoft Corp. for $761 million. Ms. Eccles also supervised a number of intellectual property lawsuits, focusing on patent infringement and music copyright claims.

Education

- Yale University (B.A. English, with distinction in the major, 1993)
- University of Texas (J.D. with honors, 2001)

Judicial Clerkship

Law Clerk for the Honorable Judge John. C. Coughenour, Western District of Washington, 2001-2002

Notable Representation

In re: Processed Eggs Products Antitrust Litigation (E.D.Pa.) (2013-present) (represent proposed class of direct purchasers of egg products in antitrust class action).

CoinLab, Inc. v. Mt. Gox KK, and Tibanne KK (W.D.Wash.) (2013-present) (represent Seattle bitcoin software and technology provider in breach of contract action against Japanese bitcoin exchange).

Global Sessions LP litigation (W.D.Tex.) (2013-2014) (represented patent holder in five related infringement suits against bank defendants; settled favorably after *Markman* hearing).

VoiceAge Corp. v. RealNetworks, Inc. (S.D.N.Y.) (2012-2013) (defended RealNetworks, Inc. in an action

for breach of a patent licensing agreement; settled favorably after defeating summary judgment).

In re MF Global Holdings Ltd. Investment Litigation (S.D.N.Y.) (2012-present) (represent class of injured commodity customers in connection with collapse of MF Global Inc.).

PACT XPP Technologies, AG v. Xilinx, Inc. and Avnet, Inc. (E.D. Tex.) (2011-2012) (represented plaintiffs in patent infringement suit; obtained $15.4 million verdict at trial).

Albright et al. v. Kibble & Prentice (AAA arbitration, Seattle WA) (2011-12) (represented investors in Meridian Mortgage securities against investment advisor; settled favorably during discovery).

Lehman Brothers International (Europe) (in administration) (2010-2011) (successfully argued for return of billions in assets from Citibank, N.A.).

Friskit, Inc. v. RealNetworks, Inc. (N.D.Cal.) (2004-2007) (defense of patent infringement; dismissed at summary judgment on invalidity grounds; affirmed on appeal).

RealNetworks, Inc. v. Microsoft Corp. (N.D.Cal.) (2004-2005) (prosecution of antitrust claims; settled for $761 million during discovery).

In re Enron Corp. (S.D.N.Y.) (2002-2004) (represented Enron as debtor-in-possession in litigation against its former financial institutions; settled favorably).

Be Incorporated v. Microsoft Corporation (N.D. Cal.) (2002-2003) (prosecuted antitrust claims alleging monopolization of the market for PC operating system software; settled favorably during discovery).

Bank of America et al. v. REI (King Co. Sup. Ct.) (2002-2003) (defended REI against misappropriation of trade secrets claim in connection with marketing of co-branded credit cards; settled near end of discovery).

Articles

Rethinking the Ethical Ban on Criminal Contingent Fees: A Commonsense Approach to Asset Forfeiture, 79 Texas L. Rev. 1699 (2001).

Professional Associations and Memberships

Washington State Bar Association

SUSMAN GODFREY L.L.P.



Krysta Kauble Pachman

Associate

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Overview

Krysta Pachman represents plaintiffs and defendants in high-stakes commercial litigation, including class actions, patent cases, copyright matters, and other disputes. Pachman has a track record of obtaining trial wins, favorable settlements and arbitration victories for her appreciative clients:

> *Krysta absorbed a lot of technical information, digested it, and helped the team understand the challenges with our case. [She] developed and recommended strategies, and stood [her] ground when the other side and their expert tried to bully [her]. Krysta's professionalism and skill was essential to the outcome we received from the panel.*
>
> -Denise M. Buffington, Director, Federal Regulatory Affairs and Corporate Counsel, Kansas City Power & Light Company

Pachman recently represented Kansas City Power & Light Company, where she was an essential part of an arbitration team on a renewable energy litigation matter. She delivered the opening statement, cross-examined the other side's expert, presented fact and expert witnesses, handled depositions, managed expert reports, and wrote the pre-and post-hearing briefs. The panel unanimously ruled in her client's favor.

In the widely covered *Ferrick, et al. v. Spotify USA,* Pachman was an integral part of a trial team that secured a $43.45 million cash settlement fund and an agreement to pay future royalties to settle a class-action lawsuit with Spotify brought on behalf of music copyright owners (fees and expenses not yet determined). The settlement is subject to court approval. This case made national news, receiving press from *Billboard*, *Forbes*, *and Reuters*.

Pachman was also part of a team that secured a $40 million settlement for a class of derivatives traders in *Timber Hill v. Pershing Square Capital Management, L.P., et al*. Timber Hill alleged Defendants violated federal securities laws through their illicit insider trading and front-running scheme that damaged Timber Hill and other investors by artificially deflating the value of options and equity forwards traded by Timber Hill and Class Members. This is the largest ever stand-alone options settlement and the largest ever Section 20A options settlement.

Pachman currently serves as counsel for one of the largest-ever certified consumer classes, which encompasses nearly all U.S. cellular phone purchasers, all of whom have been impacted by Qualcomm's anti-competitive conduct. This complex case straddles the intersection of antitrust and technology, and

fees on its intellectual property. Most recently in the matter, Ms. Pachman briefed and successfully obtained class certification for the group – synthesizing hundreds of pages of expert analyses, voluminous fact evidence, and case law spanning complex antitrust and intellectual property issues. In 2018, the Court granted class certification in a 66-page order finding "substantial," "strong" and "compelling" evidence to support the certification. Click here for the certification order.

Earlier in her career, Pachman played a key role in *Schulein, et al. v. Petroleum Development Corp.*, representing a class of more than 7,000 limited partners who invested in 12 oil and gas limited partnerships, who alleged the defendants made false and misleading statements and omitted material information regarding the value of the assets held by the partnerships in proxy statements used to solicit votes in favor of mergers that caused the investors to be cashed out of their investments. Pachman took key depositions, wrote the opposition to defendants' motion for summary judgment, and wrote the successful opposition to defendants' motion to decertify the class. The case was settled for $37.5 million in March 2015, with the class receiving approximately $24 million.

Prior to joining Susman Godfrey, Pachman served as a Law Clerk to the Honorable Philip S. Gutierrez in the U.S. District Court for the Central District of California. She also serves on the Board of Governors for the Women Lawyers' Association of Los Angeles.

Education

- Northwestern University (B.A., Political Science and Communication Studies, magna cum laude)
- UCLA School of Law (J.D.)

Judicial Clerkship

Law clerk to the Honorable Philip S. Gutierrez, United States District Court for the Central District of California

Honors and Distinctions

Named a Next Generation Woman Leader in Tech Law by *The Recorder* (ALM, 2018)

Southern California "Rising Star" (Thomson Reuters, 2017 and 2018)

UCLA Law Review, Chief Comments Editor, Vol. 58

Professional Associations

- State Bar of California
- Board of Governors, Women Lawyers Association of Los Angeles

Notable Representations

In re Qualcomm Antitrust Litigation Pachman serves as counsel for one of the largest-ever certified consumer classes, which encompasses nearly all U.S. cellular phone purchasers, all of whom have been impacted by Qualcomm's anti-competitive conduct. This complex case straddles the intersection of antitrust and technology, and involves Qualcomm's monopoly in the cellular modem chip market to extract supra-competitive licensing fees on its intellectual property. Ms. Pachman has played a crucial role in this matter – from taking depositions of key Qualcomm C-level executives and high-ranking Apple third-party witnesses to working with and defending the depositions of antitrust, pass through and licensing experts to representing class members in discovery. Most critically, Ms. Pachman briefed and successfully obtained class certification for the group – synthesizing hundreds of pages of expert analyses, voluminous fact evidence, and case law spanning complex antitrust and intellectual property issues. In 2018, the Court granted class certification in a 66-page order finding "substantial," "strong" and "compelling" evidence to support the certification. Click here for the certification order.

Timber Hill v. Pershing Square Capital Management, L.P., et al. Pachman was part of the team that secured a $40 million settlement for a class of derivatives traders in Timber Hill v. Pershing Square Capital Management, L.P., et al. Timber Hill alleged Defendants violated federal securities laws through their illicit insider trading and front-running scheme that damaged Timber Hill and other investors by artificially deflating the value of options and equity forwards traded by Timber Hill and Class Members. This is the largest ever stand-alone options settlement and the largest ever Section 20A options settlement.

Ferrick et al. v. Spotify USA In this music-industry related copyright class action, Pachman, along with a team from Susman Godfrey L.L.P. and Gradstein & Marzano, secured both a $43.45 million cash fund and an agreement to pay future royalties to settle a class-action lawsuit with Spotify brought on behalf of music copyright owners. This ground-breaking case gained national media attention, receiving press from *Billboard*, *Forbes*, and *Reuters*. Fees and expenses have not yet been determined.

General Motors LLC Ignition Switch Litigation In this massive class action against General Motors, hundreds of suits were consolidated into a federal multidistrict litigation in New York over an ignition switch defect in GM vehicles, which causes the engine to switch off during use and disable the car's air bags. Pachman worked with a team of Susman Godfrey lawyers on the sixth personal injury bellwether case, which settled favorably on eve of trial. This case received substantial press from outlets such as *The Wall Street Journal*.

Lithium Ion Batteries Antitrust Litigation Pachman defended more than twenty depositions in this nationwide antitrust class action brought against the world's largest manufacturers of lithium ion batteries, which power virtually every laptop computer, cell phone, smartphone, digital music player (e.g., iPods), tablet device (e.g., iPads), digital camera and camcorder, and cordless power tool used today. The suit alleges that the defendants engaged in a long-running conspiracy over more than a decade to unlawfully fix, raise and stabilize prices of lithium ion batteries.

ZiiLabs v. Apple and Samsung Along with a team from Susman Godfrey and Heim Payne & Chorush, Pachman represented ZiiLabs, a subsidiary of the Singapore-based media company Creative Technologies, Ltd. Ziilabs brought claims for patent infringement of its patents related to graphics processing technology developed originally by 3DLabs. Pachman took and defended key depositions in this matter, prepared and argued key motions in *limine*, defeated summary judgment and successfully opposed Daubert motions. The case settled on the eve of trial after Apple had taken a license.

Sentius v. Microsoft Pachman represented Sentius against Microsoft in a patent infringement suit involving automated database technology. Pachman handled the Daubert motions in this matter. The case settled on highly favorable terms within 24 hours of the court issuing orders on those motions.

Schulein, et al. v. Petroleum Development Corp., et al. Pachman, along with a team from Susman Godfrey, represented plaintiffs in this class action litigation in Santa Ana federal court on behalf of more than 7,000 limited partners who invested in 12 oil and gas limited partnerships. Plaintiffs alleged the defendants made false and misleading statements and omitted material information regarding the value of the assets held by the partnerships in proxy statements used to solicit votes in favor of mergers that caused the investors to be cashed out of their investments. On the eve of trial, after three years of hard fought litigation – and following the court's denial of defendants' class decertification motion, which Pachman wrote, and denial of defendants' partial motions for summary judgment, also written by Pachman — the case was settled for $37.5 million, with the class receiving approximately $24 million.

Taylor v. Shippers Transport Express Pachman, along with a team from Susman Godfrey, represented Shippers Transport Express and SSA Marine in a misclassification case. Susman Godfrey was retained to assist with trial preparation, and the case settled on favorable terms just before trial.

Westmoor v. Ganga Pachman, along with a team from Susman Godfrey, represented Westmoor in this copyright infringement suit in the Central District of California. Pachman briefed cross-motions for summary judgment in this case, which settled on favorable terms shortly after motion for summary judgment briefing.

EXHIBIT B

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

Firm Name: Susman Godfrey L.L.P.

Reporting Period: March 1, 2017 through April 1, 2019

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	CURRENT HOURS	HOURLY RATE	CURRENT LODESTAR	CUMULATIVE HOURS	CUMULATIVE LODESTAR
Seltzer, Marc (P) 2018	5.5								5.3		7.1	0.8			18.70	$1,500.00	$28,050.00	18.70	**$28,050.00**
Seltzer, Marc (P) 2017									0.8		0.6				1.40	$1,200.00	$1,680.00	1.40	**$1,680.00**
Hoek, Kathryn (P) 2017									0.8						0.80	$600.00	$480.00	0.80	**$480.00**
Sklaver, Steven (P) 2018											0.5				0.50	$800.00	$400.00	0.50	**$400.00**
Pachman, Krysta K. (A) 2019											0.2				0.20	$575.00	$115.00	0.20	**$115.00**
Pachman, Krysta K. (A) 2018							21.1		5.8		4.1	7.4			38.40	$525.00	$20,160.00	38.40	**$20,160.00**
Pachman, Krysta K. (A) 2017								0.9			0.1				1.00	$400.00	$400.00	1.00	**$400.00**
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**21.10**	**0.90**	**6.60**	**0.00**	**4.90**	**7.40**	**0.00**	**0.00**	**61.00**		**$51,285.00**	**61.00**	**$51,285.00**
NON-ATTORNEYS																			
Chokshi, Aashka (PL)									5		0.8				5.80	$225.00	$1,305.00	5.80	**$1,305.00**
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**5.00**	**0.00**	**0.80**	**0.00**	**0.00**	**0.00**	**5.80**		**$1,305.00**	**5.80**	**$1,305.00**
GRAND TOTAL:	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**21.10**	**0.90**	**11.60**	**0.00**	**5.70**	**7.40**	**0.00**	**0.00**	**66.80**		**$52,590.00**	**66.80**	**$52,590.00**

EXHIBIT C

Date	Tkpr #	TKPR Name	Rank	Matter	Matter Name	Amount	Hours	Task	Narrative
6/29/2018	5334	Chokshi, Aashka	Paralegal	13657	Lithium Batteries Antitrust	$1,125.00	5	LI09	Compiling and organizing all exhibits listed in plaintiff's notice of motion and motion for class certification and memorandum of law in support for K. Pachman review.
6/26/2018	5334	Chokshi, Aashka	Paralegal	13657	Lithium Batteries Antitrust	$112.50	0.5	LI11	Reviewing file to locate various deposition transcripts and exhibits for K. Pachman.
6/27/2018	5334	Chokshi, Aashka	Paralegal	13657	Lithium Batteries Antitrust	$67.50	0.3	LI11	Reviewing and responding to email from court reporting company re [redacted] and conferring re [redacted] with K. Pachman.
5/5/2017	2822	Hoek, Kathryn P.	Partner	13657	Lithium Batteries Antitrust	$480.00	0.8	LI09	Reviewing correspondence from lead counsel.
11/1/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$840.00	1.6	LI07	Revising allocation counsel submission.
11/1/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$577.50	1.1	LI07	Preparing response to allocation counsel submission.
11/2/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$2,310.00	4.4	LI07	Preparing response to allocation counsel submission.
11/5/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$2,415.00	4.6	LI07	Preparing response to allocation counsel submission.
11/9/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$4,935.00	9.4	LI07	Revising response to allocation counsel submission.
5/26/2017	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$80.00	0.2	LI08	Emailing with co-counsel and D. Fennelly re [redacted]
5/25/2017	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$80.00	0.2	LI08	Participating in phone conversation with John Kopp re [redacted]
5/25/2017	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$80.00	0.2	LI08	Emailing with referring counsel re [redacted]
5/25/2017	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$120.00	0.3	LI08	Emailing Drew Fennelly re [redacted]
10/30/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$1,680.00	3.2	LI09	Revising allocation counsel submission.
10/31/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$1,365.00	2.6	LI09	Revising allocation counsel submission.
11/28/2017	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$40.00	0.1	LI11	Emailing with D. Fennelly re [redacted]

10/28/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$2,152.50	4.1	LI11	Researching legal issues re [redacted]
1/22/2019	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$115.00	0.2	LI11	Emailing with D. Fennelly re [redacted].
10/29/2018	4145	Pachman, Krysta K.	Associate	13657	Lithium Batteries Antitrust	$3,885.00	7.4	LI12	Preparing allocation counsel submission.
3/17/2017	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$960.00	0.8	L109	Emailing to and from S. Williams, et al., re [redacted] and reviewing order.
10/26/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$3,750.00	2.5	LI01	Conducting legal and factual research re [redacted], including review of previous filings in the litigation.
10/28/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$4,500.00	3	LI01	Conducting further legal research and case facts and allocation plans and emailing to and from K. Pachman re [redacted]
11/9/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,500.00	1	LI09	Reviewing CRT decision issued yesterday and emailing to and from K. Pachman re [redacted].
11/9/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$5,250.00	3.5	LI09	Reviewing and revising reply memorandum and further emails to and from K. Pachman re [redacted]
11/12/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,200.00	0.8	LI09	Emailing to and from L. Alexander, et al., re [redacted]
11/15/2017	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$720.00	0.6	LI11	Reviewing 9th circuit filings.
9/14/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$600.00	0.4	LI11	Conferring by phone with A. Zapala re ser [redacted]
10/1/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$600.00	0.4	LI11	Emailing to and from S. Sklaver re [redacted].
10/2/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$300.00	0.2	LI11	Conferring with S. Sklaver re [redacted]
10/25/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$450.00	0.3	LI11	Conferring with K. Pachman re [redacted].
10/26/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,500.00	1	LI11	Emailing to and from JAMS re [redacted]
10/26/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$900.00	0.6	LI11	Emailing to and from K. Pachman re [redacted].

10/29/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,500.00	1	LI11	Working on submission to mediation and emailing to and from S. Scarlett re [redacted]
10/30/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,500.00	1	LI11	Working on submission to mediator and emailing to and from K. Pachman re [redacted] and conferring with K. Pachman re [redacted]
11/1/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,500.00	1	LI11	Emailing to and from A. Zapala and K. Pachman re [redacted] and further emailing to and from K. Pachman re [redacted]
11/8/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,800.00	1.2	LI11	Reviewing briefing on allocation issues. Emailing to and from K. Pachman re [redacted]
10/31/2018	1040	Seltzer, Marc M.	Partner	13657	Lithium Batteries Antitrust	$1,200.00	0.8	LI12	Reviewing and revising submission to mediator and conferring with K. Pachman re [redacted]
10/31/2018	2825	Sklaver, Steven G.	Partner	13657	Lithium Batteries Antitrust	$400.00	0.5	LI11	Conferring re [redacted] and [redacted] issues re [redacted]
Total						**$52,590.00**	**66.8**		

EXHIBIT D

EXHIBIT D

In re Lithium Ion Batteries Antitrust Litigation
SUSMAN GODFREY L.L.P.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	$125,000.00
Court Fees (Filing, etc.)	$310.00
Experts/Consultants	
Online document database	
Federal Express	
Hearing Transcripts	$2,829.25
Investigation	
Lexis/Westlaw	$3,182.70
Messenger/Delivery	$2,584.07
Photocopies – In House (capped at $0.20 per copy)	$1,815.80
Photocopies – Outside	$2,330.25
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	$28.40
Travel	$53,600.82
Miscellaneous	$861.14
TOTAL:	$192,542.43

EXHIBIT 64

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF STEVEN G. SKLAVER IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF SUSMAN GODFREY L.L.P.**

I, Steven G. Sklaver, declare:

1. I am a Partner of Susman Godfrey L.L.P., ("Susman Godfrey"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to class representative Anna Jawor, Andrew Fennelly, David Reymann and other IPPs throughout the course of this litigation. The background and experience of Susman Godfrey and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Susman Godfrey performed the following work: conducting legal research for purposes of preparing amended pleadings and opposing multiple motions to dismiss; assisting in briefing responses to multiple motions to dismiss; assisting in preparing amended pleadings; conducting document review (including foreign language) for purposes of responding to motions to dismiss, preparing amended pleadings, and taking deposition discovery; reviewing documents for production in response to written discovery requests; preparing and serving written responses to written discovery; preparing and serving amended responses to written discovery; preparing and serving written discovery on defendants; reviewing defendants' responses to written discovery; identifying deficiencies in defendants' discovery responses and participating in multiple meet and confer conferences with multiple defendants to address deficiencies in written discovery responses and document productions; taking the lead in coordinating the depositions of class representatives; preparing and defending the majority of the depositions of class representatives; and conferring with class representatives

regarding case status; and conferring with co-lead counsel regarding case strategy, discovery and case status.

5. Attached hereto as **Exhibit B** is a billing summary of Susman Godfrey's total hours and lodestar, computed at current rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Susman Godfrey during this period of time was 2,781.90, with a corresponding lodestar of $1,224,114.50. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Susman Godfrey. A compilation of those detailed records is attached hereto as **Exhibit D.**

6. Attached hereto as **Exhibit C** is a list of the historical rates for Susman Godfrey's attorneys and staff.

7. Attached hereto as **Exhibit E** is a summary of the expenses Susman Godfrey has incurred during the course of this litigation. Susman Godfrey expended a total of $190,523.88 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Susman Godfrey on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit E were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

8. I have reviewed the time and expenses reported by Susman Godfrey in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23rd, 2017 at Los Angeles, California.

/s/ Steven G. Sklaver
Steven G. Sklaver

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

Consumer

Products Liability

Securities Fraud

Class Action

For over thirty-five years, Susman Godfrey has been one of the preeminent firms in the country in class action cases. We have secured billions of dollars in victories for our clients across many fields, including antitrust and price-fixing cases, securities litigation, consumer class actions, and products liability cases. From the Corrugated Container antitrust class action, where Steve Susman's team recovered $500 million for the plaintiffs, to 2015's $37.5 million class action win ($23 million after fees and expenses) for a class of more than 7000 limited partners who invested in 12 oil and gas limited partnerships , the Firm has a tradition of winning results, against the fiercest adversaries, when the stakes are highest. Defendants have also recognized the expertise and prowess of the Firm in class action litigation and the Firm has been retained to represent Defendants in a number of high stakes class action cases.

Some of the other recent significant results in class action cases the Firm has handled include:

- In a seminal insurance class action filed in the Southern District of New York, resolved in September 2015, Susman Godfrey served as lead counsel in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final Pretrial Conference — less than two months before trial. Settlement terms included: $48.5 million cash fund ($34 million after fees and expenses), COI freeze through 2020, and a covenant by Phoenix not to challenge the

policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded: “I want to say publicly that I think this is an excellent settlement. I think this is a superb – this may be the best settlement pound for pound for the class that I’ve ever seen.”

- A class of 800,000 Comcast cable subscribers represented in part by Susman Godfrey alleged that between Jan. 1, 2003 and Dec. 31, 2008, Comcast and other cable companies entered into subscriber swaps and acquisitions that deterred over-builder competition and enabled Comcast to raise prices to supracompetitive levels, in violation of sections 1 and 2 of the Sherman Act. The parties settled for $50 million after remand of the case from the U.S. Supreme Court. Final settlement (after fees and expenses) is to be determined later in 2015.

- In May 2014 Susman Godfrey secured a $19 million cash settlement for customers of two New York City tour bus companies (approximately $12 million after fees and expenses), Coach USA Inc. and City Sights LLC, and their joint venture, Twin America LLC. The settlement ends an antitrust class action against the joint venture, which plaintiffs said eliminated competition between the two bus companies and artificially raised prices for passengers.

- In December 2013 Susman Godfrey attorneys secured $86 million in settlements (approximately $62 million after fees and expenses) when serving as co-lead counsel in litigation involving more than 70 class action cases on behalf of airline passengers who alleged that between January 1, 2000 and August 1, 2007, Korean Air Lines and Asiana Airlines conspired to fix the price of air travel between the United States and the Republic of Korea. The lawsuit asserted that the two airlines, in violation of federal antitrust laws, participated in meetings, conversations and communications during which they agreed to establish artificially high prices for air passenger travel.

- In July 2013 Toyota Motor Corporation agreed to pay benefits worth up to $1.6 billion (approximately $1.4 billion after fees and expenses) to settle multi-district class action litigation pending in federal court in Santa Ana, California. In the litigation, plaintiffs, represented by Susman Godfrey, asserted claims for economic losses associated with recalls for unintended acceleration problems in Toyota, Lexus and Scion vehicles.

- In March 2013, Susman Godfrey secured a jury verdict in an antitrust price-fixing class action brought on behalf of direct purchasers of vitamin C against two Chinese vitamin C manufacturers. The $54.1 million verdict was tripled as required by law and after adjusting for $32.5 million in settlements with other defendants ($19.5 million net of fees and expenses), a final judgment of $147 million was entered against the defendants. The judgment is now on appeal to the Second Circuit Court of Appeals.

- Susman Godfrey represented investors who were allegedly defrauded into purchasing securities issued by the parent of mortgage lender IndyMac Bank. The complaint alleged that IndyMac had misrepresented its financial health and the quality of its lending practices. In January 2013, after more than five years of intense, hard-fought litigation, the court granted final approval of a $6.5 million recovery for the class (approximately $4 million after fees and expenses).

- In White, et al. v. NCAA, Susman Godfrey served as co-lead counsel in an antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. The NCAA settled and paid, after fees and expenses, an additional $218 million for use by current student-athletes to cover the costs of attending college and paid $10 million to cover educational and professional development expenses for former student-athletes.

- Susman Godfrey has been appointed to serve as lead or co-lead counsel in over a dozen antitrust class actions since 1996. In appointing Susman Godfrey co-lead counsel in one such case, In re Crude Oil, Judge Pauley praised the firm's long history of serving as "lead counsel in hundreds of class actions, including complex antitrust actions." See In re Crude Oil Commodity Futures Litig., No. 11-CV-3600 (WHP), 2012 WL 569195, at *2 (S.D.N.Y. Feb. 14, 2012).

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Products Liability

Securities Fraud

Consumer

Susman Godfrey prides itself on its deep bench of talent, wide range of experience, and ability to take on any case, any time. Its experience in class and mass action cases is not limited to the antitrust and securities fields-the Firm has scored multi-million dollar victories in consumer and civil rights cases, oil royalty and contract litigation, and has successfully represented defendants in a host of "bet the company" class action cases.

- Clark v. AdvanceMe, Inc., a class action brought in Los Angeles federal court challenging financial arrangements with retail merchants under California's laws against usury. Marc Seltzer, Arun Subramanian, and Drew Hansen served as lead counsel for the class. In 2011, the case was settled for approximately $23.4 million in cash and other economic consideration, approximately $19 million net to the class.

- In 2010, Susman Godfrey was appointed co-lead counsel in the wide-ranging Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation. Susman Godfrey partners Marc Seltzer, Steven Sklaver and Rob Safi are in charge of this high-profile case, representing the economic loss class action plaintiffs.

- In November 2008, the Firm won a jury trial for a class of California residential telephone customers against AT&T. The case involved a claim that AT&T overcharged customers by collecting $16.5 million more in Universal Service Fund charges than it paid into the Fund. The Tenth Circuit upheld the verdict. In re Universal Service Fund Telephone Billing Practices Litig., 619 F.3d 1188 (10th Cir. 2010).

Susman Godfrey served as lead trial counsel and briefed and argued the appeal.

- In July 2008, Susman Godfrey represented the Hertz Corporation in a class action case challenging the company's rental car fuel service charges. Eric Mayer successfully argued and won the appeal in the case. The class consisted of tens of thousands of class members and Plaintiffs alleged millions of dollars in damages. The Court of Appeals for the Thirteenth District Court of Texas reversed the trial court's class certification order and decertified the class on all claims. This victory will serve as persuasive authority in similar cases around the country.

- In 2006, on behalf of 4300 royalty and overriding royalty owners across the United States, Susman Godfrey attorneys Tom Paterson, Shawn Raymond, and New Mexico co-counsel obtained a $27.5 million settlement with ConocoPhillips for alleged underpayment of royalty on natural gas liquids produced from the San Juan Basin of northwestern New Mexico and processed at the New Blanco Plant near Bloomfield, New Mexico.

- In 2005, less than a week before the start of a jury trial in Clayton, New Mexico, OXY USA, Inc. agreed to pay $12 million to settle a class action lawsuit brought by Susman Godfrey's Thomas W. Paterson and Shawn Raymond and New Mexico co-counsel on behalf of a class of royalty owners who had leased mineral rights to OXY for the production of C02 at the Bravo Dome Unit in northeastern New Mexico. The $12 million settlement represented approximately 90% of the total amount of actual damages sought by the class. The settlement also required OXY to pay litigation expenses of $400,000 and settlement administration expenses of $200,000. Finally, OXY has agreed to change how it calculates plaintiffs' royalty on a going-forward basis. This change will result in a near doubling of the royalty amounts OXY was paying the class members before the filing of this lawsuit in 2004.

- In 2004, Susman Godfrey's Bill Carmody won a net $40 million settlement in Shockey v. Chevron U.S.A., a royalty class action, after prevailing on hotly contested issues of class certification and choice of law.

- Susman Godfrey obtained class certification from the Middle District of Florida for a class of African-American employees of

Western Auto Supply Co. (now owned by Advance Stores Company, Inc.) who were suing the former auto parts retailer for racial discrimination. The defendants immediately appealed the certification decision to the United States Court of Appeals for the Eleventh Circuit. Susman Godfrey's Joseph Grinstein briefed and argued the appeal, and the Eleventh Circuit affirmed the class certification decision — the first such class action the Eleventh Circuit had upheld in decades. The case settled in 2003, with the defendants making a substantial payment to the class.

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SUSMAN GODFREY L.L.P.



Marc M. Seltzer

Partner

Los Angeles
(310) 789-3102
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Overview

Marc Seltzer has practiced law for more than forty years, litigating complex cases in state and federal courts throughout the United States. Before joining Susman Godfrey, he was a principal in the law firm of Corinblit & Seltzer, a Professional Corporation. Marc Seltzer's relationship with the lawyers of Susman Godfrey began in the late 1970's, when he worked with Steve Susman on the *Corrugated Container* antitrust case. In the ensuing years, Mr. Seltzer joined forces with Susman Godfrey on a number of other cases. In February 1998, Marc Seltzer became a partner of the firm, and opened the firm's Los Angeles office. Since then, the firm's Los Angeles office has become one of the leading litigation boutiques in California.

Marc Seltzer's involvement in nationally prominent litigation began in the mid-1970's, when he was tapped by Jack Corinblit to work on the massive *Equity Funding* securities litigation. That case consisted of more than 100 consolidated class and private action cases, and was settled in 1976 for over $60 million, then the largest recovery ever achieved in a securities fraud class action. *See In re Equity Funding Corp. of America Securities Litigation*, 438 F. Supp. 1303 (C.D. Cal. 1977). Later, in the 1980's, Mr. Seltzer was appointed by the Los Angeles federal court to serve as sole lead counsel to represent the plaintiff class in the *ZZZZ Best* securities fraud case. The *ZZZZ Best* fraud was described by the United States Attorney for the Central District of California as "the most massive and elaborate securities fraud perpetrated on the West Coast in over a decade," harking back to the Equity Funding case. The case resulted in several important published decisions sustaining plaintiffs' claims. *See In re ZZZZ Best Securities Litigation*, 864 F. Supp. 960 (C.D. Cal. 1994).

Since joining the firm, Mr. Seltzer has continued to work on complex litigation. Marc Seltzer was, together with Steve Susman, a member of the Susman Godfrey trial team representing approximately 90 financial institutions in a negligent misrepresentation case against one of the "Big Four" accounting firms. That case settled just prior to the commencement of trial. Marc Seltzer also teamed with Steve Susman in prosecuting the In *re Vitamin Antitrust Litigation*, which was settled pursuant to agreements that made more than $1.05 billion available to the class.

In *McCourt v. McCourt*, Mr. Seltzer served as co-trial counsel with Steve Susman in representing Frank McCourt in his marital property litigation with his former wife which involved competing claims to ownership of the Los Angeles Dodgers. In 2015, Mr. Seltzer successfully argued the appeal taken in that case by Ms. McCourt from the order denying her motion to set aside the settlement reached in that case.

In the *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, Marc Seltzer was appointed by the Court to serve as one of the co-lead counsel for the economic loss class action plaintiffs. After three years of hard fought litigation, an historic settlement was reached valued by the Court at approximately $1.6 billion, with the class receiving net benefits valued at approximately $1.4 billion.

In December 2013, Mr. Seltzer was named to *Law360's* annual list of legal "MVPs." He was one of just three attorneys in the nation selected by *Law360* for recognition in the Class Action category. In 2014, 2015 and 2016, he was named to the *International Who's Who of Competition Lawyers & Economists.* Nominees were selected by *Global Competition Review* based upon "comprehensive, independent survey work with both general counsel and private practice lawyers worldwide."

Mr. Seltzer has been appointed to serve as lead or co-lead counsel for plaintiffs in numerous additional cases noted below. Over his many years of practice, Mr. Seltzer has also represented defendants in a wide variety of cases, including antitrust, securities, copyright, trademark, trade secret, unfair competition and other complex litigation.

Education

- University of California at Berkeley (B.A., 1969)
- UCLA School of Law (J.D., 1972)

Honors and Distinctions

- Recipient, 2012 Jewish Federation of Los Angeles' Bruce I. Hochman-Maimonides Torch of Justice Award
- Recipient, 2004 American ORT Jurisprudence Award
- Named a "Super Lawyer" by Southern California Law & Politics magazine (2004-2017, Thomson Reuters)
- Named one of Law Dragon's 500 Leading Plaintiff's Lawyers (2007)
- Named one of Law Dragon's 100 Lawyers You Need To Know in Securities Litigation (2008)
- Named a Litigation Star by *Benchmark Litigation* (2014 and 2015)
- Ranked by Martindale-Hubble as an AV Preeminent Lawyer (2015)
- Named by *US News* as one of the *Best Lawyers in America* (2016, Woodward White, Inc.)

Books and Articles

- Co-author, California Federal Civil Rules (LexisNexis 2015);
- Co-author, California State Antitrust and Unfair Competition Law (Matthew Bender & Co. 2014), published by the Antitrust and Unfair Competition Law Section, State Bar of California
- "Choosing Between Class and Derivative Actions," published in Second Annual Institute, Class and Derivative Litigation in the 1990's — The New Frontier (Prentice Hall Law & Bus. 1991); and the same topic for subsequent Annual Institutes
- "Measures of Damages in Private Actions for Violations of the Federal Securities Laws: The Basic Rules and Selected Problems," published in Securities Litigation 1990 (PLI 1990)
- "Shareholders' Derivative Suits in Contests for Corporate Control," published in Securities Litigation 1986: Prosecution and Defense Strategies (PLI 1986)

Professional Associations and Memberships

- Past Vice-Chair of the Executive Committee, Antitrust and Unfair Competition Law Section, State Bar of California
- Past President and current member of the Board of Directors of the Ninth Judicial Circuit Historical Society
- Past President and current member of the Board of Directors of the Legal Aid Foundation of Los Angeles
- Member, Executive Committee of the Litigation Section of the Los Angeles County Bar Association
- Member, The Chancery Club
- Member, Board of Governors of the Association of Business Trial Lawyers
- Member, Board of Directors of the National Equal Justice Library
- Member, Board of Directors, American Friends of Hebrew University, Western Region
- Member, Board of Trustees of the Lawyers Committee for Civil Rights Under Law
- Member, Board of Directors of the Friends of the Los Angeles County Law Library
- Life Member of the American Law Institute
- Member, Advisory Board of the American Antitrust Institute
- Life Fellow of the American Bar Foundation
- Member, American Bar Association (and its Business Law, Antitrust Law, Torts and Insurance Law, and Litigation Sections)
- Member, American Association for Justice
- Member, Consumer Attorneys of California

- Member, Selden Society

Notable Representation

- *In re Korean Air Lines Co., Ltd. Antitrust Litigation*, consisting of more than eighty consolidated antitrust class action cases pending in the Los Angeles federal court. Marc Seltzer was appointed by the Los Angeles federal court to serve as one of the co-lead counsel for the class. The case was settled for $86 million in cash and travel vouchers, with the class receiving approximately $60 million.
- *Schulein, et al. v. Petroleum Development Corp., et al.*, a case in which Marc Seltzer served as lead counsel for the plaintiffs in a class action brought in Santa Ana federal court on behalf of more than 7000 limited partners who invested in the 12 limited partnerships. Plaintiffs alleged the defendants made false and misleading statements and omitted material information regarding the value of the partnerships in its proxy statements used to solicit votes in favor of mergers that cased them out of their investments. After three years of hard fought litigation – and following the court's denial of defendants' class decertification motion, partial motions for summary judgment and a motion that the plaintiffs weren't entitled to seek punitive damages, the case was settled for $37.5 million in March 2015, with the class receiving approximately $24 million.
- *McGuire v. Dendreon Corp.*, consolidated securities fraud class action cases filed in Seattle federal court in which Marc Seltzer was appointed by the Court to serve as lead counsel for the class. The case was settled on the eve of trial for $16.5 million, with the class receiving approximately $12 million.
- *Clark v. AdvanceMe, Inc.*, a class action brought in Los Angeles federal court challenging financial arrangements with retail merchants under California's laws against usury. Marc Seltzer served as lead counsel for the class. The case was settled for approximately $23.4 million in cash and other economic consideration, with the class receiving approximately $19 million.
- *CLRB Hanson Industries, LLC v. Google, Inc.,* a class action for alleged false advertising which was settled for $20 million, with the class receiving $15 million. Marc Seltzer successfully argued the appeal from the judgment approving the settlement before the Ninth Circuit. *See* 465 Fed. Appx. 617 (9th Cir. 2012)
- *In Re Universal Service Fund Telephone Billing Practices Litigation*, an antitrust and breach of contract class action involving more than fifty consolidated cases in which Marc Seltzer served as co-lead trial counsel for plaintiffs. The case was settled as to one defendant for benefits to the class totaling $25 million, and tried to a verdict as to the remaining defendant. The jury found in favor of defendant on the antitrust claim and returned a verdict in favor of plaintiffs on the breach of contract claim which was affirmed by the Tenth Circuit. The trial court issued numerous published decisions in this matter. *See, e.g., In Re Universal Service Fund Telephone Billing Practices Litigation*, 300 F. Supp.2d 1107 (D. Kan. 2003).
- *Masimo Corp. v. Tyco Healthcare Group L.P.*, an antitrust case in which Marc Seltzer served as co-trial counsel for the plaintiff. The case was tried to a verdict resulting in an award in favor of our client. A new trial was granted as to damages. On retrial, the Court awarded approximately $45 million in damages (after trebling). The Ninth Circuit affirmed the liability verdict and damages award. *See* 350 Fed. Appx. 95 (9th Cir. 2009). Our client received a net recovery of approximately $27 million.
- *White v. NCAA*, an antitrust class action brought in Los Angeles federal court challenging limitations on financial assistance provided by colleges and universities to student athletes. Marc Seltzer served as co-lead counsel for the plaintiff class. The case was settled for benefits netting the class approximately $220 million, plus court-approved attorneys' fees and costs.
- *In re Structured Settlement Litigation*, consolidated class actions brought in the Los Angeles Superior Court in which Marc Seltzer served as one of the lead counsel for the plaintiffs. The plaintiffs were parties to structured settlements who were victimized by the alleged fraudulent conversion of U.S. Treasury bonds backing their settlements. After three years of hotly contested litigation, the case was settled. More than $100 million was distributed to the class.
- *Livid Holdings, Ltd. v. Salomon Smith Barney, Inc.*, a securities fraud case brought on behalf of an investor in a start up company. Marc Seltzer was retained to represent the plaintiff on appeal following the dismissal of the action by the trial court, and was successful in overturning the dismissal of the case.*See Livid Holdings Ltd. v. Salomon Smith Barney, Inc.*, 416 F.3d 940 (9th Cir. 2005). The case was subsequently settled for a confidential amount.
- *In Motorcar Parts & Accessories Securities Litigation*, fourteen consolidated securities fraud class actions in which Marc Seltzer was appointed by the Los Angeles federal court to serve as lead counsel for the class. The case was

settled for $7.5 million. *See Z-Seven Fund, Inc. v. Motorcar Parts & Accessories*, 231 F.3d 1215 (9th Cir. 2000).

- *In re IDB Communications Group, Inc. Securities Litigation*, in which Marc Seltzer served as one of four co-lead counsel appointed by the Los Angeles federal court to represent the plaintiff class in more than twenty consolidated securities fraud class action cases. The case was settled for $75 million.
- *In re Taxable Municipal Bond Securities Litigation*, in which four lawyers, including Marc Seltzer, served on Plaintiffs' Executive Committee, and together with plaintiffs' lead counsel, supervised and managed every aspect of the litigation. This litigation was a consolidated multi-district proceeding brought on behalf of defrauded purchasers of taxable municipal bonds. The case resulted in numerous reported decisions on important recurring issues arising under the federal securities laws. *See, e.g., In re Taxable Municipal Bond Litigation*, [1993 Transfer Binder] Fed. Sec. L. Rep. (CCH) 97,742 (E.D. La. 1993). After several years of intense litigation, the case was settled for approximately $110 million.
- *Cowles v. Gannett Outdoor Co., Inc.*, of Southern California, coordinated class actions brought in Los Angeles federal court for an alleged conspiracy to suppress competition for leases for billboards sites in Southern California in violation of § 1 of the Sherman Act. Marc Seltzer served as co-lead counsel for the class. The case was settled for $6.5 million.
- *Slaven v. B. P. America, Inc.*, a class action brought in Los Angeles federal court on behalf of fishermen and business owners for economic losses suffered as a result of the spill of more than 200,000 gallons of crude oil from a tanker off the coast of Huntington Beach, California that befouled coastal waters and nearby beaches. The case was brought under the Trans-Alaska Pipeline Authorization Act, admiralty law and the law of California, and resulted in several published decisions in the district court and the Ninth Circuit. *See*, e.g., *Slaven v. B. P. America*, Inc., 973 F.2d 1468 (9th Cir. 1992). Marc Seltzer served as co-lead counsel for the class. The case was ultimately settled for $4 million, plus court-approved attorneys' fees and costs.
- *In re Carnation Company Securities Litigation*, consolidated class actions for violation of the federal securities laws brought in Los Angeles federal court. The plaintiffs alleged that false denials were made relating to the potential takeover of Carnation Company by Nestle, S.A., before the merger of the two firms was announced. Marc Seltzer served as co-lead counsel for the class. The case was settled for $13 million.
- *In re International Technology Securities Litigation*, consolidated securities class actions filed in Los Angeles federal court. The plaintiffs alleged that the Company's financial statements were materially misleading for failing to earlier write off or set up appropriate accounting reserves relating to the Company's off-site waste disposal operations. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for $12 million in cash and newly-issued securities.
- *Guenther v. Cooper Life Sciences, Inc.*, a combined stockholders class and derivative action brought in San Francisco federal court for alleged false and misleading statements regarding the Company's products and prospects. Marc Seltzer served as co-lead counsel for plaintiffs. The case was settled for $9.85 million in cash plus non-cash economic benefits valued at $8.3 million.
- *Heckmann v. Ahmanson,* consolidated class and derivative actions arising out of the alleged "greenmailing" of the Walt Disney Co. by Saul Steinberg and a group of his companies. Marc Seltzer was one of the lead counsel for the class of stockholders. The case was settled after three weeks of trial for approximately $60 million. *See Heckmann v. Ahmanson*, [1989 Transfer Binder] Fed. Sec. L. Rep. ¶ 94, 447 (Cal. Sup. Ct. April 12, 1989) (order denying summary judgment).
- *Financial Federation, Inc. v. Ashkenazy*, in which Marc Seltzer and his co-trial counsel successfully defended at trial an anti-takeover case brought in Los Angeles federal court under the federal securities laws and the RICO statute by a financial institution against persons who allegedly sought to take control of the institution. *See Financial Federation, Inc. v. Ashkenazy*, [1984 Transfer Binder] Fed. Sec. L. Rep. (CCH) 91,489 (C.D. Cal. 1983).
- *Green v. Occidental Petroleum Corp.*, in which Marc Seltzer, together with co-counsel, represented plaintiffs in consolidated securities fraud class action cases that established important precedent in the Ninth Circuit regarding the certification of plaintiff classes and the computation of damages in securities fraud cases. *See Green v. Occidental Petroleum Corp.*, 541 F.2d 1335 (9th Cir. 1976). The case was settled for $12 million.
- *Wool v. Tandem Computers, Inc.*, a securities fraud class action in which Marc Seltzer played a leading role. One of the notable achievements in this case was a victory for the plaintiffs in the Ninth Circuit which established important precedent concerning the measure of damages recoverable in federal securities fraud class action cases, the standard for "controlling person" liability under the federal securities laws and the requirements for pleading fraud with the particularity specified under Rule 9(b), Fed.R. Civ. P. *See Wool v. Tandem Computers, Inc.*, 818 F.2d 1433 (9th Cir. 1987). Following the issuance of the Ninth Circuit's decision, the case was settled for $16.5 million.

- *Plaine v. McCabe*, a securities class action, in which Marc Seltzer argued before the Ninth Circuit, obtaining a substantial victory for plaintiffs, and establishing significant precedent in the Ninth Circuit regarding the standards for liability and remedies for violations of tender offer disclosure rules under the federal securities laws. *See Plaine v. McCabe*, 797 F.2d 713 (9th Cir. 1986).
- *Biben v. Card*, consolidated securities fraud class actions where Marc Seltzer served as co-lead counsel for plaintiffs. The plaintiffs achieved substantial pretrial victories, including establishing the validity of their claims under the federal securities laws against the defendants in that case. *See Biben v. Card*, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,010 (W.D. Mo. 1985), on denial of motion for reconsideration, [1984-1985 Transfer Binder] Fed. Sec. L. Rep. (CCH) 92,083 (W.D. Mo. 1985). The case settled for approximately $12 million.
- *Sanwa Bank California v. Facciani*, where Marc Seltzer was co-lead counsel for a plaintiff class in which settlements totaling approximately $26 million in cash were obtained on behalf of defrauded investors who were victimized by an alleged Ponzi scheme.
- *In re California Indirect-Purchaser Infant Formula Antitrust Class Action Litigation*, comprised of several consolidated consumer class actions brought for alleged price-fixing of infant formula products. Marc Seltzer was appointed by the Court to serve as one of two co-lead counsel for plaintiffs and the class. The case was settled for approximately $20 million.
- *Small v. Sunset Park*, where Marc Seltzer was lead counsel for a class of investors involving an alleged Ponzi scheme in which settlements totaling more than $16.8 million were achieved ($11.8 million net to the class), including $12 million paid in settlement by a then "Big Five" accounting firm.
- *In re Applied Magnetics Corporation Securities Litigation*, consolidated securities fraud class actions, filed in Los Angeles federal court, where Marc Seltzer was appointed co-lead counsel for the class. Plaintiffs successfully defended against defendants' motion to dismiss plaintiffs' consolidated complaint. *See In re Applied Magnetics Corp. Sec. Litig.*, [1994-1995 Transfer Binder] Fed. Sec. L. Rep. (CCH) ¶ 98,345 (C.D. Cal. 1994). The case was subsequently settled.
- *Schneider v. Traweek*, federal and state court securities fraud class actions in which Marc Seltzer was lead counsel for the plaintiffs. Significant victories were obtained on plaintiffs' behalf in defeating motions to dismiss and in obtaining class certification. *See Schneider v. Traweek* [1990 Transfer Binder] Fed. Sec. L. Rep. (CCH) 95,419 and 95,505 (C.D. Cal. 1990). The case was settled for approximately $14 million, $10.8 million net to the class.
- *Johnson v. Boston*, where Marc Seltzer was co-lead counsel for a nationwide class of investors in promissory notes victimized by an alleged Ponzi scheme. Approximately $20 million in settlements were obtained for the defrauded investors.
- *Lilienthal v. Levi Strauss & Co.*, an individual minority shareholder's action for alleged breach of fiduciary duty by the majority owners, which resulted in a judgment after trial for the plaintiff providing for a recovery in excess of $3 million. Plaintiff subsequently collected more than $2 million net of attorneys' fees. Marc Seltzer was co-trial counsel for the plaintiff with Jack Corinblit.

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Overview

Named one of California's Lawyer Attorneys of the Year in 2017 and selected as 1 of the 30 Top Plaintiff Lawyers in all of California in 2016 by *The Daily Journal*, Steven Sklaver has secured substantial litigation victories for both plaintiffs and defendants. For plaintiffs, Sklaver was lead counsel for a certified class of insurance policy owners, helping them achieve what the Court in the Southern District of New York described as "the best settlement pound for pound for the class that I've ever seen." You can read the Court's statement in full here. You can also read more about the case in The Deal's profile on the litigation here. Sklaver was also lead trial and appellate counsel for investors against an insurance company that resulted in a complete victory and full pay-out of a $20 million life insurance policy. A copy of the appellate court decision is available here. To listen to Sklaver's appellate oral argument, click here. That matter was the feature cover story of the April 2012 California Lawyer.

Sklaver currently represents a class of animation employees in ***In re Animation Workers*** (N.D. Cal.) an antitrust action against the largest animation companies, including Disney, Pixar, Lucasfilms, DreamWorks, and Sony. The Court certified the class in 2016, and thus far over $168 million in settlements have been secured (amount after fees and expenses is TBD). Sklaver also represents the former members of the legendary rock group The Turtles in ***Flo & Eddie, Inc. v. Sirius XM Radio, Inc.*** (C.D. Cal.) in a class action lawsuit against Sirius XM that settled less than 48 hours before the jury trial was scheduled to begin. Sirius XM agreed to pay class members a cash fund and royalties under a 10-year license that is valued up to $99 million as compensation for publicly performing without a license Pre-1972 sound recordings. The settlement has received widespread media coverage from publications such as The New York Times, Billboard, The Hollywood Reporter,Law360, Rolling Stone, Variety, Reuters and Managing IP and remains subject to Court approval.

Sklaver's many significant and widely covered class action results in 2016 helped secure Susman Godfrey's recognition as *Law360's* "Class Action Group of the Year" in early 2017. You can read that article announcing the award here.

For defendants, Sklaver has handled numerous employment class actions across the country. He served, along with the Managing Partner of Susman Godfrey, as trial counsel for Wal-Mart, the world's largest retailer, trying a large employment class action in California. He also successfully defended and defeated class certification in numerous, substantial wage and hour matters for Alta-Dena Certified Dairy, LLC, dairy producers for Dean Foods, one of the leading food and beverage companies in the United States. Copies of the pro-employer decisions are available here, here, and here.

Sklaver has tried complex commercial and class action disputes — including jury trials and bench trials in federal and state court, as well as arbitrations. Sklaver graduated cum laude from Dartmouth College, magna cum laude and Order of the Coif from Northwestern University School of Law, and clerked for Judge David Ebel on the United States Court of Appeals for the Tenth Circuit. Sklaver also won the National Debate Tournament for Dartmouth College, and is just one of four individuals in debate history to win three national championships at the high school and collegiate level. From 2010-2017, Sklaver has been recognized every year as a "Super Lawyer" in Southern California, awarded to no more than the top 5% of the lawyers in the state of California (Law & Politics Magazine, Thomson Reuters).

Sklaver currently serves on the Board of Directors for the Western Center on Law & Poverty, the Los Angeles Metropolitan Debate League, and the Association of Business Trial Lawyers. Sklaver was also selected as the 2016-2017 Ninth Circuit Judicial Conference Lawyer Representative

Education

- Dartmouth College (B.A., *cum laude*)
- Northwestern University School of Law (J.D., *magna cum laude* and Order of the Coif)

Judicial Clerkship

Law Clerk to the Honorable David M. Ebel, United States Court of Appeal for the Tenth Circuit

Honors and Distinctions

- Named one of California's Lawyer Attorneys of the Year in 2017 by *The Daily Journal*. Click here for a photo of Sklaver, along with co-counsel, receiving the award.
- Selected as 1 of the 30 Top Plaintiff Lawyers in all of California in 2016 by *The Daily Journal*
- 2010-2017 listings of Southern California "Super Lawyers" awarded to no more than the top 5% of the lawyers in the state of California (Law & Politics Magazine, Thomson Reuters)
- Northwestern Law Review member and editor
- National Debate Tournament (NDT) collegiate championship winner

Articles and Speeches

"Federal Power to Commandeer State Courts: Implications for the Theory of Judicial Federalism," 32 Ind. L. Rev. 71 (1998) (with Martin H. Redish, Professor, Northwestern University School of Law).

Speaking Engagements

- Current COI Increases – What's it All About? The Legal Perspective. ReFocus2017 Conference (Las Vegas, NV)
- Litigation Update: Will the Arthur Kramer Insurable-Interest Decision Lift the Cloud Over Much of the Litigation in the Market? The 2011 International Life Settlements Conference (London, England)
- Seeking Interlocutory Appellate Review of Class-Certification Rulings: Tactics, Strategies, and Selected Issues. Bridgeport 10th Annual Class Action Litigation Conference (Los Angeles, CA)
- PwC 2010 Securities Litigation Study Luncheon. (Los Angeles, CA)
- Life Settlement Litigation Update. 2010 Life Settlement Compliance Conference and Legal Round Table (Atlanta, GA)
- Litigation: What are the Legal Trends Affecting the Market? The Life Settlements Conference 2010 (Las Vegas, NV)

Professional Associations and Memberships

- United States Supreme Court
- United States Court of Appeals for the Ninth and Tenth Circuits
- United States District Courts for the Central, Southern, Northern, and Eastern Districts of California and District of Colorado
- Admitted to state bars of Illinois, Colorado, and California
- Board of Directors, Los Angeles Metropolitan Debate League
- Board of Directors, Western Center on Law & Poverty

Notable Representations

Class Actions

- ***Copyright Infringement:*** Sklaver serves as co-lead counsel with the Gradstein & Marzano firm representing Flo & Eddie (the founding members of 70's music group, The Turtles) along with a class of owners of pre-1972 sound recordings for copyright violations by music provider Sirius XM. The day before trial was to commence before a California jury in federal court in late 2016, Flo & Eddie reached a landmark settlement with Sirius XM on behalf of the class in a deal potentially worth $99 million. The Court granted preliminary approval of that class action settlement in January 2017 and final approval is set for May 2017. Click here for more. Sklaver with his co-leads were recently named "California Lawyer Attorneys of the Year" by *The Daily Journal* for their outstanding legal work on this case.

- ***Insurance***: In a seminal insurance class action filed in the Southern District of New York, resolved in September 2015, Mr. Sklaver served as lead counsel in a case that challenged Phoenix Life Insurance Company's and PHL Variable Insurance Company's decision to raise the cost of insurance ("COI") nationwide on life insurance policy owners. After winning class certification and defeating two motions for class decertification and a motion for summary judgment, the case settled the day of the final Pretrial Conference — less than two months before trial. Settlement terms included: $48.5 million cash fund ($34 million after fees and expenses), COI freeze through 2020, and a covenant by Phoenix not to challenge the policies, worth $9 billion in face value, when the policies mature on the grounds of lack of insurable interest or misrepresentations in the application. At the final approval hearing, the Court concluded, ***"I want to say publicly that I think this is an excellent settlement. I think this is a superb – this may be the best settlement pound for pound for the class that I've ever seen."*** You can read the statement in full on page 3 here. You can also read more about the case in *The Deal's* feature on the matter here.

- ***Antitrust:*** *In In re Automotive Parts Antitrust Litigation.* In the largest price-fixing cartel ever brought to light, Mr. Sklaver and a team of Susman Godfrey lawyers run a massive MDL litigation in which the firm serves as co-lead counsel for a class of consumer plaintiffs in multidistrict price-fixing cases pending in a Detroit, Michigan federal court. The actions, alleging anti-competitive conduct, were brought by indirect purchasers of component parts included in over 20 million automobiles, and involve parts such as wire harnesses, instrument panel clusters, fuel senders, heater control panels and alternators.
  The Department of Justice has imposed fines exceeding $2.6 billion pursuant to guilty plea agreements with some of the defendants, and its investigation is still ongoing. The Susman Godfrey team together with its co-lead counsel has defeated multiple motions to dismiss. Settlements have been reached with a certain defendants for a combined $620 million thus far. Final settlement (after fees and expenses) has not yet been determined. The case remains ongoing against the remaining defendants.

LIFE SETTLEMENTS

- Represented Jonathan Berck, as Trustee of the Rosamond Janis Insurance Trust in a $5 million rescission claim brought by the Lincoln Life and Annuity Company of New York for alleged violations of New York's insurable interest laws and other "STOLI" (stranger originated life insurance) related claims. RESULT: Summary judgment granted in favor of my client. A copy of the summary judgment order is available here.
- Won reversal in a $20 million life settlement rescission lawsuit against Lincoln Life & Annuity Company of New York. Lincoln's lawsuit was based on allegations that the insurance policies lacked an insurable interest because they were procured by third-parties for investment purposes and because there were net worth and other misrepresentations in the applications. The appellate court ordered that the trial court enter judgment in favor of the trust. The appellate court also affirmed our trial court victory that Lincoln's fraud claim was time barred because the policies were incontestable. The case is Lincoln Life & Annuity Co. of New York v. Jonathan Berck, as Trustee of the Jack Teren Insurance Trust, Court of Appeal Case No. D056373 (Cal. Ct. App. May 17, 2011). A copy of the appellate court decision is available here. To listen to Mr. Sklaver's appellate oral argument, click here. The *Teren* case was the feature, cover story of the April 2012 *California Lawyer*.
- Represents investors, trusts, trustees, brokers, and insureds in life settlement and STOLI litigation across the country against insurance companies seeking to rescind policies with face values worth more than $125 million. Mr. Sklaver is also a frequent speaker and commentator on life settlement and STOLI litigation, in both trade publications and conferences.

FINANCIAL FRAUD

- Represented Royal Standard Minerals, which was the plaintiff in a federal securities lawsuit against a "group" of

more than ten dissident shareholders for failing to file Schedule 13-D disclosures. RESULT: Preliminary injunction granted and final judgment entered that, among other things, required for three years the votes of all shares owned by any of the defendants to be voted as directed by the Board of Directors of my client.

- Represented plaintiff who held millions of WorldCom shares as an opt-out to the class in In re WorldCom Securities Litig. RESULT: Settled on confidential terms.
- Represented plaintiff Accredited Home Lenders in a TRO and breach of contract action over a wrongful default declared by Wachovia in a credit re-purchase agreement. RESULT: The case was resolved favorably, following the entry of a TRO.
- Represented Walter Hewlett in his challenge to the Hewlett-Packard/Compaq merger. In preparation for that trial, Mr. Sklaver deposed Compaq's former CEO Michael Capellas about his famous handwritten journal note which, describing the merger, stated "at our course and speed we will fail." Mr. Capellas was right.

EMPLOYMENT

- Represented one of the world's largest retailers in the defense of a four month long jury trial, wage and hour class action pending in California. One of the world's largest retailers appointed Susman Godfrey L.L.P. to be its national trial counsel for wage and hour litigation.

ANTITRUST

- Lead day-to-day lawyer for the class in White, et al. v. NCAA, a certified, antitrust class action alleging that the NCAA violated the federal antitrust laws by restricting amounts of athletic based financial aid. ESPN Magazine coverage of the lawsuit may be found here. RESULT: The NCAA settled and paid an additional $218 million for use by current student-athletes to cover the costs of attending college, paid $10 million to cover educational and professional development expenses for former student-athletes, and enacted new legislation to permit Division I institutions to provide year-round comprehensive health insurance to student-athletes.

ENTERTAINMENT

- Represented NAACP image award winner Morris Taylor "Buddy" Sheffield in his breach of contract lawsuit against ABC Cable Networks Group regarding the creation of Hannah Montana. RESULT: Defendant settled less than four weeks before trial.

PRO BONO

- Appointed to represent Carl Petersen, who was charged by the United States Attorney's Office with being a felon in possession of a firearm — a charge that carries a five-year prison sentence and an 89% conviction rate. RESULT: Acquittal. Jury deliberation lasted less than four hours.

  Appointed by the United States Court of Appeals for the Tenth Circuit as appellate counsel in five cases, including: United States v. Petersen; United States v. Blaze (specifically noting Mr. Sklaver's "good workmanship"); and Sorrentino v. IRS (appointed as amicus curiae by and for the Court)

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Overview

Ms. Srinivasan tries high-stakes cases for plaintiffs and defendants in courtrooms across the country. A partner in the Los Angeles office and a member of the firm's Executive Committee, she has secured significant victories for her clients in patent, unfair competition, trade secret, copyright, class action, and other disputes.

Ms. Srinivasan has been widely recognized for her work. She was recently named one of *The Daily Journal's* "California Lawyer Attorneys of the Year" for her work in *Flo & Eddie Inc. v. Sirius XM Radio Inc.*, a copyright class action involving pre-1972 sound recordings. For the same matter Srinivasan was named a "2017 Power Lawyer" by *The Hollywood Reporter*. Additionally, Srinivasan received the Trailblazer Award by The South Asian Bar Association of Southern California in March 2017. In 2016, *The Recorder's* included her on their 2016 Women Leaders in Tech Law. *The Daily Journal* heralded her in 2016 as one of its leading California women lawyers for her work on cases involving the Internet of Things. *The National Law Journal* called Ms. Srinivasan one of the nation's 75 Outstanding Women Lawyers. Ms. Srinivasan has been deemed a "Powerbroker" by *Law360*. In 2014, the *Los Angeles and San Francisco Daily Journal* named Ms. Srinivasan one of California's "Top 20 [Lawyers] Under 40". And, Ms. Srinivasan was named one of the "Best Lawyers Under 40" by the National Asian Pacific American Bar Association (NAPABA). Ms. Srinivasan also has been recognized as a Southern California Super Lawyer in 2016 and 2017, awarded to no more than the top 5% of the lawyers in the state of California (Thomson Reuters).

Ms. Srinivasan serves as a commissioner on the Judicial Nominees Evaluation Commission of the California State Bar, which vets the governor's potential judicial candidates. Ms. Srinivasan sits on the Board of the Western Justice Center and has previously served on the executive committee of the South Asian Bar Association of North America. She is a member of the California Bar Foundation. Ms. Srinivasan has previously chaired the firm's Hiring, Training and Diversity Committees.

Before becoming a lawyer, Ms. Srinivasan reported for The Associated Press in Washington D.C., covering national media and telecommunications policy.

Education

Ms. Srinivasan received her Bachelor of Arts from Yale University, where she completed a double major in Comparative Literature and Yale's program in Ethics, Politics and Economics. She earned her J.D. from Stanford Law School, where she graduated with distinction, served as editor of the Stanford Law Review and won Stanford's Marion Rice Kirkwood Moot Court Competition.

Judicial Clerkship

Ms. Srinivasan clerked for Judge Raymond C. Fisher on the U.S. Court of Appeals for the Ninth Circuit.

Articles and Speeches

Ms. Srinivasan speaks frequently on topic such as preparing for trial and trying different types of cases, from defending employment class actions to prosecuting antitrust claims.

PAST SPEAKING ENGAGEMENTS

- 2017 Class Action Litigation Conference - Los Angeles; April 7,2017. Click here for more information.
- South Asian Bar Association - "Women in Tech" Panel; Wednesday, February 8, 2017, 6:00pm 8:00pm. Click here for more information.
- Innovation in eDiscovery Conference - Sandpiper Partners LLC, February 15, 2017, City Club of San Francisco.
- Bid-Rigging without Borders: What's Next in International Cartel Investigations?, ABA International Law Meeting, Tokyo, Japan, October 19, 2016.
- Argument in Support of Certification on Behalf a Direct Purchaser Class Before the Hon. Judge Susan Illston, 11th ABA/IBA International Cartel Workshop, Tokyo, Japan, February 4, 2016. Click here for agenda and photo.
- 10th Annual Federal Court Boot Camp, Pincus Professional Education, Los Angeles DoubleTree, May 15, 2013.
- 9th Annual Federal Court Boot Camp, Pincus Professional Education, Los Angeles Athletic Club, May 3, 2012.
- How to Climb into Any Jury Box, State Bar of California, Annual Meeting, Monterrey, California, October 2012.
- Stop the Presses! Litigating Cases Tried in the Courtroom and the Court of Public Opinion, National South Asian Bar Association annual meeting, Philadelphia, June 30, 2012.
- Legal Challenges and Pitfalls That Affect Start-ups and Entrepreneurs, TiE SoCal, Orange County, CA, May 16, 2012.
- How Much is This Going to Cost Me? Best Practices in Alternative Fee Arrangements, International Bar Association, May 10, 2012, New York.
- Managing Wage & Hour Risks 2012, Trial of Collective and Class Actions, Practising Law Institute, New York, February 13, 2012.
- The Beginning of the End: Preparing for Trial, North American South Asian Bar Association, Los Angeles, June 2011.
- How to Prepare for The Big Event: Trial (The Last 90 Days), Women Antitrust Plaintiffs' Attorneys, Minneapolis, October 2010.
- Moot Court Argument: *United States v. Bhagat Singh Thind*, North American South Asian Bar Association, Boston, June 2010.
- Ninth Circuit Roundtable, Pincus Professional Education, 2006.

Professional Associations and Memberships

Ms. Srinivasan actively participates in a range of legal and philanthropic organizations in Los Angeles and nationwide.

- Ms. Srinivasan serves as a commissioner on the Judicial Nominees Evaluation Commission of the California State Bar, which vets the governor's potential judicial candidates.
- Ms. Srinivasan sits on the board of the South Asian Network, an organization which server and advocates on behalf of the South Asian networkn in Southern California.http://southasiannetwork.org/
- Ms. Srinivasan sits on the board of the Western Justice Center, an organization of judges, lawyers and civic leaders that promote research and legal education on alternative forms of dispute resolution and justice reform. http://www.westernjustice.org/home
- Ms. Srinivasan currently co-chairs the litigation section of the North American South Asian Bar Association. http://www.nasaba.com
- Ms. Srinivasan sat on the Board of Directors of the South Asian Bar Association of Southern California.http://www.sabasc.org
- Ms. Srinivasan previously served on the programming committee of the Young Advocates Committee of the American Bar Association litigation section.
- Ms. Srinivasan is a barrister of The Judge Paul R. Michel Intellectual Property Inn of Court in Los Angeles

Notable Representation

Intellectual Property

- ***Flo & Eddie v. Sirius XM:*** Ms. Srinivasan serves as co-lead counsel with the Gradstein & Marzano firm

representing Flo & Eddie (the founding members of 70's music group, The Turtles) along with a class of owners of pre-1972 sound recordings for copyright violations by music provider Sirius XM. The day before Ms. Srinivasan was set to deliver opening arguments before a California jury in federal court for a trial on Flo & Eddie's damages claim, Flo & Eddie reached a landmark settlement with Sirius XM on behalf of the class in a deal potentially worth $99 million. The Court granted preliminary approval of that class action settlement in January 2017 and final approval is set for May 2017. Click here for more. Srinivasan and her co-leads were recently named "California Lawyer Attorneys of the Year" by *The Daily Journal* for their outstanding legal work on this case.

- ***Jawbone v. Fitbit***: Ms. Srinivasan served as co-lead counsel for Jawbone in its patent infringement and trade secret case involving wearable devices against competitor Fitbit in the International Trade Commission (Investigation No. 337-TA-963) and Jawbone's patent infringement case against Fitbit in the Northern District of California.
- ***Title Source Inc v. HouseCanary:*** Ms. Srinivasan is co-lead counsel for HouseCanary in this breach of contract case related to HouseCanary's innovative technology for appraisal, valuation and market forecasts related to the residential real estate market.
- ***Trianni, Inc. v. Former Employees***: Ms. Srinivasan is lead counsel in this trade secret misappropriation case brought by biotechnology company Trianni related to its transgenic mouse platforms.
- ***ZiiLabs v. Samsung***: Ms. Srinivasan represented ZiiLabs, a subsidiary of the Singapore-based media company Creative Technologies Ltd. Ziilabs brought claims for patent infringement of its patents related to graphics processing technology developed originally by 3DLabs. The case settled on the eve of trial after Apple had taken a license.
- ***GPNE v. Apple:*** Ms. Srinivasan represented telecommunications company GPNE in its patent infringement case against Apple's iPhones and iPads. A jury found GPNE's patents valid but not infringed. Ms. Srinivasan delivered opening arguments as described here.
- ***MicroUnity v. Apple***: Ms. Srinivasan represented MicroUnity Systems Engineering, Inc., one of the leading innovators in the microprocessor industry, in its patent infringement lawsuit against Apple, Samsung and major players in the smartphone and tablet industry. The claims arose from infringement of patents covering "mediaprocessor" technology. The case settled with the last of the defendants taking licenses just shortly before trial.
- ***PersonalWeb v. Microsoft & Yahoo!***: Ms. Srinivasan represented PersonalWeb in asserting its patents directed at the utilization of substantially unique identifiers against Microsoft and Yahoo! in the Eastern District of Texas. Both parties settled after Markman but prior to trial.
- ***PalTalk v. Sony and Activision***: Ms. Srinivasan represented PalTalk Holdings, Inc., the nation's premiere Internet video chat community, in its patent infringement lawsuit against Sony's World of Warcraft, Activision Blizzard's Call of Duty and other video game offerings. The case settled before trial after PalTalk received a favorable Markman ruling.
- ***PalTalk v. Microsoft***: Ms. Srinivasan prosecuted PalTalk's patent claims against Microsoft Corporation for its Xbox video game offerings, culminating in a March 2009 jury trial in U.S. District Court for the Eastern District of Texas. The parties settled on the fourth day of trial – following Ms. Srinivasan's cross-examination of Microsoft's first witness – with Microsoft agreeing to take a license to the two PalTalk patents for a confidential sum of money. For more about the case, click here.

Antitrust and Other Class Actions

- ***In re Lithium Batteries:*** Ms. Srinivasan and a team of Susman Godfrey lawyers serve on the executive committee representing a class action lawsuit brought on behalf of consumers/end purchasers of lithium ion batteries found in products such as laptops, tablets, mobile phones, and digital cameras.
- ***Tessera Technologies, Inc. v. Hynix Semiconductor, Inc.***: Ms. Srinivasan represented Tessera in its antitrust claims against DRAM manufacturer Hynix involving Tessera's patented semiconductor packaging technology. Tessera successfully opposed the defendants' motion for summary judgment as to its antitrust claims, and the parties entered into a confidential settlement in December 2012.

Other Class Actions

- ***In re General Motors.***: Ms. Srinivasan and a team of Susman Godfrey lawyers serve on the executive committee representing plaintiffs who suffered personal injury and economic loss as a result of General Motors' ignition switch defect.

Employment

- ***Johnston v. Rawlings***: Ms. Srinivasan won a defense-side jury verdict on behalf of The Rawlings Company in a closely watched certified class action challenging the company's classification of its employees. During the three-week jury trial in Kentucky state court, Ms. Srinivasan conducted the examination of company executives and expert witness and cross-examined a class representative. The jury verdict was featured in the American Lawyer. For more about the case, click here.
- ***December 2007***: Ms. Srinivasan and a team of Susman Godfrey lawyers litigated to verdict a three-month class action representing the nation's largest retailers in Minnesota state court. At trial, Ms. Srinivasan conducted the direct and cross examinations of more than a dozen witnesses.

Breach of Contract

- ***NHL v. Moyes***: Ms. Srinivasan currently represented Jerry Moyes in a case brought by the National Hockey League arising from the bankruptcy of the Phoenix Coyotes hockey team. A federal judge affirmed the rulings of a bankruptcy court throwing out most of the damages sought by the NHL, after Ms. Srinivasan and her team successfully moved for summary judgment. The case was set for trial in Arizona federal court on the remaining issues before the parties reached a settlement.

Honors and Distinctions

Named a 2017 Power Lawyer by *The Hollywood Reporter*

Named a 2017 California Lawyer of the Year by *The Daily Journal*. Click here for a photo of Srinivasan, along with co-counsel, receiving the award.

Recipient of the 2017 Trailblazer Award by South Asian Bar Association of Southern California (March 2017). Click here for more on the event and here for a photo of Srinivasan accepting her award.

Named as one of the 2016 Women Leaders in Tech Law by *The Recorder* (ALM Media Properties, LLC). Click here for more.

Named on of the *The National Law Journal's* Outstanding Women Lawyers (ALM Media Properties, LLC). Click here for NLJ's profile.

Recognized as a "Powerbroker" by *Law 360*. Click here to view the article.

Named by the *Los Angeles and San Francisco Daily Journal* as one of California's top 20 lawyers under the age of 40. Click here to view the article.

Named by the National Asian Pacific American Bar Association (NAPABA) as one of the "Best Lawyers Under 40". Click here to view the article.

Featured in the *Minority Corporate Counsel Association* magazine. Click here to view the article.

Recognized as a Super Lawyer in 2016 and 2017 by *California Law & Politics* magazine (Thomson Reuters) – an honor awarded to the top 5% of lawyers in the Southern California area.

Recognized as a Rising Star in 2013, 2014 and 2015 by *California Law & Politics* magazine (Thomson Reuters) – an honor awarded to the top 2.5% of lawyers in the Southern California area.

Named to the inaugural Hot List Issue by *Lawyers of Color*. See profile here.

SUSMAN GODFREY L.L.P.



Kathryn P. Hoek

Partner

Los Angeles
(310) 789-3132
khoek@susmangodfrey.com

Overview

Ms. Hoek is a partner in the firm's Los Angeles office. She is the Chair of the firm's Diversity Committee and serves on the Employment Committee, and she previously served on the firm's Executive Committee. Ms. Hoek is particularly proud of her efforts to increase the hiring and retention of women and diverse lawyers at the firm. In addition to her work at the firm, Ms. Hoek teaches Depositions at UCLA Law School.

In her work for clients, Ms. Hoek represents plaintiffs and defendants in a broad range of business litigation matters, including contract disputes, patent and other intellectual property matters, employment and wage and hour litigation, class actions, antitrust cases, insurance cases and securities litigation. Based on her successful representation of clients in multiple practice areas, Ms. Hoek was named a "Super Lawyer" in 2014-2017 by Southern California Super Lawyers (Thomson Reuters) and a "Rising Star" in 2006-2008 and 2011-2013 (Thomson Reuters).

Education

- Yale University (B.A. with Honors and Distinction in Major, *summa cum laude*, 1997)
  - Phi Beta Kappa
  - Rita Lipson Cup (awarded for intellectual growth, personal maturity, and active consideration for others)
  - Mildred Priest Frank Memorial Prize in Sociology
- Yale Law School (J.D. 2001)
  - Yale Law School Coker Fellow (fellowship to teach legal writing)

Judicial Clerkship

Law Clerk to The Honorable Lee H. Rosenthal, United States District Court for the Southern District of Texas (2001-2002)

Professional Associations and Memberships

- State Bar of California
- Admitted to Practice in Ninth Circuit, Federal Circuit, and United States District Courts for the Central and Northern Districts of California and the Southern District of Texas
- Women Lawyers Association of Los Angeles
- Federal Bar Association
- Association of Business Trial Lawyers
- Beverly Hills Bar Association

Notable Representation

- *NRG Renew LLC v. SunPower Corporation, Systems* (Superior Court of California, County of Contra Costa) (2014 – present). Ms. Hoek represents SunPower Corporation, Systems in this complex litigation matter involving indemnification and breach of contract claims arising from the financing and construction of one of the world's

largest solar power plants, California Solar Valley Ranch (CVSR).

- *Dial Corporation, et al. v. News Corporation, et al.* (United States District Court, Southern District of New York) (present). Ms. Hoek represents a class of retailers in this antitrust class action in which the retailers accuse News America of violating the antitrust laws by maintaining a monopoly in the market for in-store promotion services, engaging in unlawful exclusive dealing arrangements, and extracting artificially high prices.
- Ms. Hoek represented the world's largest retailer in some of the largest wage and hour class actions ever brought in several states across the country, during which Susman Godfrey acted as national trial counsel.
- *Tessera Technologies, Inc. v. Hynix Semiconductor , Inc., et al.* (Superior Court of California, County of San Francisco) (2007-2012). Ms. Hoek represented the plaintiff Tessera in this antitrust action against DRAM manufacturer Hynix. Tessera alleged that Hynix conspired with several other DRAM manufacturers to boycott and suppress the adoption of Tessera's patented semiconductor packaging technology designed for use with the revolutionary memory chip technology known as RDRAM. Tessera successfully opposed the defendants' motion for summary judgment as to its antitrust claims, and the parties entered into a confidential settlement in December 2012.
- Ms. Hoek represented the world's largest retailer in a major multi-district antitrust class action pending in the United States District Court for the Northern District of California. The case was brought by current and former subscribers to online DVD rental services who asserted claims for illegal market allocation and attempted monopolization of the home entertainment market. The Court granted summary judgment dismissing the claims of one group of subscribers. SG negotiated a favorable settlement for its client as to the remaining group of subscribers.
- *Watts v. Sysco Corp., et al.* (Superior Court of California, County of Alameda) (2010-2011). Ms. Hoek represented Sysco Corp. and several California subsidiaries in a labor dispute in which the plaintiffs sought to assert class wide claims to recover business expenses and late wage penalties under California law. Ms. Hoek negotiated a favorable settlement for her client, which was approved in September 2011.
- *MicroUnity Systems Engineering, Inc. v. Intel and Dell* (United States District Court, Eastern District of Texas) (2005). Susman Godfrey brought this patent infringement case on behalf of its client MicroUnity against Intel and Dell. The complaint alleged that Intel's Pentium III, Pentium 4, and Pentium M processors, and Dell's use of those processors, infringed several MicroUnity patents covering mediaprocessor technology. Ms. Hoek handled discovery and developing the damages case. Just weeks before trial, the parties reached a confidential settlement, the financial terms of which Intel disclosed in its Third Quarter 2005 10-Q. National media reported on the significance of the case, including articles in the New York Times, the Wall Street Journal, and several technology news outlets.
- *MicroUnity Systems Engineering, Inc. v. Sony* (United States District Court, Eastern District of Texas) (2005-2007). Susman Godfrey also represented MicroUnity in this patent infringement case against Sony, alleging that Sony's PlayStation 2 and PlayStation Portable (PSP) game systems infringed MicroUnity's patents covering mediaprocessor and memory controller technology. Ms. Hoek again handled discovery and damages issues. The parties reached a confidential settlement in the Fall of 2007.
- *Livid Holdings, Ltd. v. Salomon Smith Barney, Inc., et al.* (United States District Court, Western District of Washington) (2005-2006). In this securities lawsuit, plaintiff Livid sued the successor-in-interest to Schroeder's & Co., Inc., and several managing directors, alleging that it had relied on a Schroeder's prospectus which contained false and misleading statements in violation of Section 10(b) and Rule 10b-5. Livid hired Susman Godfrey after the trial court dismissed its complaint. Susman Godfrey successfully argued before the Ninth Circuit and obtained reversal of the trial court's ruling (See *Livid Holdings, Inc. v. Salomon Smith Barney, Inc., et al.*, 416 F.3d 940 (9th Cir. 2005)), and Ms. Hoek successfully opposed a petition for rehearing en banc. Following remand to the trial court and after substantial discovery, the parties reached a confidential settlement.
- *Stark v. Shapell Industries, Inc.* (Superior Court of California, County of Los Angeles) (2005-2007). Susman Godfrey brought this class action on behalf of named plaintiff Allan Stark and others similarly situated who purchased homes from Shapell Industries, Inc. The complaint alleged that Shapell required purchasers to use Shapell's in-house escrow services as a condition of the purchase of a new home, in violation of California law. Ms. Hoek successfully argued in the Court of Appeal and defeated an extraordinary writ proceeding resulting in a published opinion on an issue of first impression of importance to California class action jurisprudence (See *Shapell Industries, Inc. v. Superior Court*, 132 Cal.App.4th 1101 (2005)). After obtaining class certification over vigorous opposition and defeating summary judgment, we reached a confidential settlement on behalf of the class.

SUSMAN GODFREY L.L.P.



Lindsey Godfrey Eccles

Partner

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(206) 516-3832
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Overview

Lindsey Godfrey Eccles is a partner in Susman Godfrey's Seattle office. She represents both plaintiffs and defendants in complex, high-stakes civil litigation including patent infringement, antitrust, fraudulent transfer, and professional negligence, as well as a variety of commercial disputes. In addition to individuals, her clients have included nationwide consumer classes, local internet companies, and large U.S. and foreign financial institutions, among others.

From 2004 to 2009 Ms. Eccles oversaw litigation in-house at RealNetworks, Inc. During her tenure Real settled its landmark antitrust suit against Microsoft Corp. for $761 million. Ms. Eccles also supervised a number of intellectual property lawsuits, focusing on patent infringement and music copyright claims.

Education

- Yale University (B.A. English, with distinction in the major, 1993)
- University of Texas (J.D. with honors, 2001)

Judicial Clerkship

Law Clerk for the Honorable Judge John. C. Coughenour, Western District of Washington, 2001-2002

Honors and Distinctions

- Managing Editor, Texas Law Review vol. 79
- Order of the Coif

Notable Representation

In re: Processed Eggs Products Antitrust Litigation (E.D.Pa.) (2013-present) (represent proposed class of direct purchasers of egg products in antitrust class action).

CoinLab, Inc. v. Mt. Gox KK, and Tibanne KK (W.D.Wash.) (2013-present) (represent Seattle bitcoin software and technology provider in breach of contract action against Japanese bitcoin exchange).

Global Sessions LP litigation (W.D.Tex.) (2013-2014) (represented patent holder in five related infringement suits against bank defendants; settled favorably after *Markman* hearing).

VoiceAge Corp. v. RealNetworks, Inc. (S.D.N.Y.) (2012-2013) (defended RealNetworks, Inc. in an action for breach of a patent licensing agreement; settled favorably after defeating summary judgment).

In re MF Global Holdings Ltd. Investment Litigation (S.D.N.Y.) (2012-present) (represent class of injured commodity customers in connection with collapse of MF Global Inc.).

PACT XPP Technologies, AG v. Xilinx, Inc. and Avnet, Inc. (E.D. Tex.) (2011-2012) (represented plaintiffs in patent infringement suit; obtained $15.4 million verdict at trial).

Albright et al. v. Kibble & Prentice (AAA arbitration, Seattle WA) (2011-12) (represented investors in Meridian Mortgage securities against investment advisor; settled favorably during discovery).

Lehman Brothers International (Europe) (in administration) (2010-2011) (successfully argued for return of billions in assets from Citibank, N.A.).

Friskit, Inc. v. RealNetworks, Inc. (N.D.Cal.) (2004-2007) (defense of patent infringement; dismissed at summary judgment on invalidity grounds; affirmed on appeal).

RealNetworks, Inc. v. Microsoft Corp. (N.D.Cal.) (2004-2005) (prosecution of antitrust claims; settled for $761 million during discovery).

In re Enron Corp. (S.D.N.Y.) (2002-2004) (represented Enron as debtor-in-possession in litigation against its former financial institutions; settled favorably).

Be Incorporated v. Microsoft Corporation (N.D. Cal.) (2002-2003) (prosecuted antitrust claims alleging monopolization of the market for PC operating system software; settled favorably during discovery).

Bank of America et al. v. REI (King Co. Sup. Ct.) (2002-2003) (defended REI against misappropriation of trade secrets claim in connection with marketing of co-branded credit cards; settled near end of discovery).

Articles

Rethinking the Ethical Ban on Criminal Contingent Fees: A Commonsense Approach to Asset Forfeiture, 79 Texas L. Rev. 1699 (2001).

Professional Associations and Memberships

Washington State Bar Association

SUSMAN GODFREY L.L.P.



Krysta Kauble Pachman

Associate

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Overview

Education

- Northwestern University (B.A., Political Science and Communication Studies, magna cum laude)
- UCLA School of Law (J.D.)

Judicial Clerkship

Law clerk to the Honorable Philip S. Gutierrez, United States District Court for the Central District of California

Honors and Distinctions

UCLA Law Review, Chief Comments Editor, Vol. 58

Professional Associations

- State Bar of California
- Board of Governors, Women Lawyers Association of Los Angeles

EXHIBIT B

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

Firm Name: SUSMAN GODFREY L.L.P. **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Eccles, Lindsey Godfrey (P)	5.60		22.00	2.00	119.50	60.70			16.30	8.90	65.90				300.90	$550.00	$165,495.00
Eccles, Lindsey Godfrey (P)							26.30								26.30	$350.00	$9,205.00
Hoek, Kathryn P. (P)			0.80	22.80	64.70	14.10			36.80		7.50				146.70	$600.00	$88,020.00
Hoek, Kathryn P. (P)							16.20								16.20	$350.00	$5,670.00
Seltzer, Marc M. (P)									1.00		2.40			1.20	4.60	$1,200.00	$5,520.00
Sklaver, Steven G. (P)	6.10			0.80	13.00			19.00	10.20		70.50				119.60	$750.00	$89,700.00
Sklaver, Steven G. (P)							6.00								6.00	$350.00	$2,100.00
Srinivasan, Kalpana (P)	0.40		0.50	0.50					27.70						29.10	$625.00	$18,187.50
Treistman, Katherine G. (P)	6.20	4.00						16.50	5.00		8.00				39.70	$600.00	$23,820.00
Treistman, Katherine G. (P)							402.00								402.00	$350.00	$140,700.00
Name (OC)															0.00	$0.00	$0.00
Pachman, Krysta K. (A)	0.40	31.80	75.60	195.40	454.00	24.00		4.00	62.20	1.10	34.10	0.20		1.40	884.20	$400.00	$353,680.00
Pachman, Krysta K. (A)							1.80								1.80	$350.00	$630.00
Hormann, Kevin C. (A)							108.90		7.00		0.30				116.20	$275.00	$31,955.00
Sato, Ken (A)							291.60								291.60	$450.00	$131,220.00
Wilson, Daniel (A)							6.80								6.80	$275.00	$1,870.00
Yagihashi, Hiroyuki (A)							302.50								302.50	$450.00	$136,125.00
SUB-TOTAL	**18.70**	**35.80**	**98.90**	**221.50**	**651.20**	**98.80**	**1162.10**	**39.50**	**166.20**	**10.00**	**188.70**	**0.20**	**0.00**	**2.60**	**2694.20**		**$1,203,897.50**
NON-ATTORNEYS																	
Cobden, Jan (PL)							0.50								0.50	$270.00	$135.00
DeGeorges, Simon (PL)	0.20						20.10								20.30	$270.00	$5,481.00
Mata, Kenneth (PL)			0.80				48.50		0.80						50.10	$225.00	$11,272.50
Sobczak, Dennis (PL)								1.00	1.60		5.70				8.30	$270.00	$2,241.00
Surujbhan, Camille (PL)							5.50								5.50	$90.00	$495.00
Tan, Joel (PL)							1.50								1.50	$270.00	$405.00
Lee, Vanessa (L)							1.50								1.50	$125.00	$187.50
SUB-TOTAL	**0.20**	**0.00**	**0.80**	**0.00**	**0.00**	**0.00**	**77.60**	**1.00**	**2.40**	**0.00**	**5.70**	**0.00**	**0.00**	**0.00**	**87.70**		**$20,217.00**
GRAND TOTAL:	**18.90**	**35.80**	**99.70**	**221.50**	**651.20**	**98.80**	**1239.70**	**40.50**	**168.60**	**10.00**	**194.40**	**0.20**	**0.00**	**2.60**	**2781.90**		**$1,224,114.50**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

SUSMAN GODFREY L.L.P.

ATTORNEYS	DATE RANGE	HOURLY RATE
Eccles, Lindsey Godfrey (P)	01/01/14 – 12/31/14	475
	01/01/15 – 12/31/15	500
	01/01/16 – 01/31/16	550
Document Review	All dates	350
Hoek, Kathryn P. (P)	01/01/14 – 12/31/14	525
	01/01/15 – 12/31/16	600
Document Review	All dates	350
Seltzer, Marc M. (P)	01/01/13 – 12/31/13	925
	01/01/14 – 12/31/15	975
Sklaver, Steven G. (P)	01/01/13 – 12/31/13	600
	01/01/14 – 12/31/14	625
	01/01/15 – 12/31/15	675
	01/01/16 – 12/31/16	700
Document Review	All dates	350
Srinivasan, Kalpana (P)	01/01/14 – 12/31/14	500
	01/01/15 – 12/31/16	550
Treistman, Katherine G. (P)	01/01/14 – 12/31/14	600
Document Review	All dates	350
Pachman, Krysta K. (A)	01/01/16 – 02/28/17	375
Document Review	All dates	350
Hormann, Kevin C. (A)	01/01/14 – 12/31/16	275
Sato, Ken (A)	01/01/15 – 12/31/15	450
Wilson, Daniel (A)	01/01/16 – 12/31/16	275
Yagihashi, Hiroyuki (A)	01/01/15 – 12/31/15	450

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

SUSMAN GODFREY L.L.P.

NON-ATTORNEYS	DATE RANGE	HOURLY RATE
Cobden, Jan (PL)	01/01/15 – 12/31/15	270
DeGeorges, Simon (PL)	01/01/16 – 12/31/16	270
Mata, Kenneth (PL)	01/01/15 – 12/31/16	225
Sobczak, Dennis (PL)	01/01/13 – 12/31/13	250
	01/01/14 – 12/31/15	270
Surujbhan, Camille (PL)	01/01/16 – 12/31/16	90
Tan, Joel (PL)	01/01/16 – 12/31/16	270
Lee, Vanessa (L)	01/01/16 – 12/31/16	125

EXHIBIT D

(REDACTED)

	B	E	F	J	K	N	O	P
1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
3	6/12/2013	Seltzer, Marc M.	Partner	LI14	0.4	925	$370.00	Emailing to and from S. Sklaver re hearing schedule and case status.
4	6/24/2013	Sklaver, Steven G.	Partner	LI11	0.2	600	$120.00	Conferring re potential South Carolina class representative.
5	6/24/2013	Sobczak, Dennis	Paralegal	LI09	0.5	250	$125.00	Reviewing recent correspondence and pleadings received and updating electronic files.
6	7/3/2013	Seltzer, Marc M.	Partner	LI14	0.4	925	$370.00	Emailing to and from S. Sklaver re prefiling conference on motions to dismiss and status conference.
7	7/10/2013	Seltzer, Marc M.	Partner	LI09	0.2	925	$185.00	Reviewing Court's order appointing Steering Committee.
8	7/11/2013	Seltzer, Marc M.	Partner	LI14	0.4	925	$370.00	Emailing to and from S. Sklaver re prefiling conference on motions to dismiss and status conference.
9	7/22/2013	Seltzer, Marc M.	Partner	LI09	0.8	925	$740.00	Reviewing Department of Justice press release and criminal information filed last week re price-fixing and reviewing media reports re same.
10	8/2/2013	Sobczak, Dennis	Paralegal	LI08	1	250	$250.00	Reviewing recent correspondence and filings and updating files with current information.
11	10/8/2013	Sklaver, Steven G.	Partner	LI11	0.2	600	$120.00	Conferring with co-lead re briefing assignment in support of opposition to motion to dismiss.
12	2/25/2014	Sobczak, Dennis	Paralegal	LI09	1.1	270	$297.00	Reviewing recent correspondence and updating files with recently filed ECF documents.
13	2/27/2014	Eccles, Lindsey Godfrey	Partner	LI07	0.8	350	$280.00	Attending document review training.
14	3/4/2014	Eccles, Lindsey Godfrey	Partner	LI07	5.4	350	$1,890.00	Conducting document review.
15	3/6/2014	Eccles, Lindsey Godfrey	Partner	LI07	1.2	350	$420.00	Conducting document review. Reviewing issue outline.
16	3/7/2014	Sklaver, Steven G.	Partner	LI07	0.5	350	$175.00	Conferring re document review request by lead counsel.
17	3/10/2014	Hormann, Kevin C.	Staff Atty	LI07	2.9	275	$797.50	Reviewing case materials in preparation for review project (1.0). Conferring with K. Srinivasan re same (.3). Training for review platform (1.6).
18	3/10/2014	Eccles, Lindsey Godfrey	Partner	LI07	0.2	350	$70.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
19	3/10/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Training for document review. Reviewing background materials.
20	3/11/2014	Hormann, Kevin C.	Staff Atty	LI07	9.2	275	$2,530.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
21	3/11/2014	Sklaver, Steven G.	Partner	LI11	0.2	625	$125.00	Conferring re document review request by co-leads.
22	3/12/2014	Hormann, Kevin C.	Staff Atty	LI07	9	275	$2,475.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
23	3/13/2014	Hormann, Kevin C.	Staff Atty	LI07	6.5	275	$1,787.50	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
24	3/13/2014	Eccles, Lindsey Godfrey	Partner	LI09	3.3	475	$1,567.50	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
25	3/14/2014	Hormann, Kevin C.	Staff Atty	LI07	7	275	$1,925.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
26	3/14/2014	Eccles, Lindsey Godfrey	Partner	LI07	0.2	350	$70.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
27	3/17/2014	Eccles, Lindsey Godfrey	Partner	LI07	1.4	350	$490.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
28	3/17/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
29	3/17/2014	Hormann, Kevin C.	Staff Atty	LI07	9.2	275	$2,530.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
30	3/18/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
31	3/18/2014	Hormann, Kevin C.	Staff Atty	LI07	9	275	$2,475.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
32	3/19/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
33	3/19/2014	Hormann, Kevin C.	Staff Atty	LI07	8.6	275	$2,365.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
34	3/20/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
35	3/20/2014	Hormann, Kevin C.	Staff Atty	LI07	8.3	275	$2,282.50	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
36	3/21/2014	Treistman, Katherine G.	Partner	LI07	3	350	$1,050.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.

	B	E	F	J	K	N	O	P
1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
37	3/21/2014	Hormann, Kevin C.	Staff Atty	LI07	6.5	275	$1,787.50	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
38	3/24/2014	Eccles, Lindsey Godfrey	Partner	LI07	1.2	350	$420.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
39	3/25/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing documents produced by Sony for purposes of responding to joint supplemental motion to dismiss and amending complaint.
40	5/5/2014	Treistman, Katherine G.	Partner	LI08	4	600	$2,400.00	Researching points of law re standards for 12(b)(6) and proving agreement (2.0) at request of co-leads. Preparing drafts of response to Toshiba motion to dismiss (1.0). Conferring by email with K. Srinivasan (.5). Comparing amended and second amended complaints of IPPs and DPPs as requested by co-leads (.5).
41	5/6/2014	Sklaver, Steven G.	Partner	LI01	0.9	625	$562.50	Conferring with co-leads re motion to dismiss opposition re: Toshiba and ownership, control issues re same.
42	5/6/2014	Treistman, Katherine G.	Partner	LI08	5	600	$3,000.00	Researching points of law re standards for 12(b)(6) and proving agreement as requested by co-leads(2.0). Preparing drafts of response to Toshiba motion to dismiss as requested by co-leads (3.0).
43	5/7/2014	Srinivasan, Kalpana	Partner	LI09	1.8	500	$900.00	Reviewing Amended Complaint (.7). Conferring with team re standing claim issues (.5). Reviewing draft motion and preparing comments on same (.6).
44	5/7/2014	Treistman, Katherine G.	Partner	LI02	4	600	$2,400.00	Researching points of law re standards for 12(b)(6) and proving agreement as requested by co-leads (2.0). Preparing drafts of response to Toshiba motion to dismiss as requested by co-leads (1.8). Conferring by email with K. Srinivasan regarding draft response to Toshiba motion to dismiss (.2).
45	5/8/2014	Sobczak, Dennis	Paralegal	LI11	1.2	270	$324.00	Locating and assembling copies of documents requested by counsel.
46	5/8/2014	Treistman, Katherine G.	Partner	LI08	4.5	600	$2,700.00	Researching points of law re standards for 12(b)(6) and proving agreement (1.5). Preparing drafts of response (2.8). Conferring by email with K. Srinivasan (.2).
47	5/8/2014	Srinivasan, Kalpana	Partner	LI09	1.8	500	$900.00	Reviewing draft to Toshiba motion to dismiss as requested by co-leads and providing team comments.
48	5/9/2014	Treistman, Katherine G.	Partner	LI08	3	600	$1,800.00	Researching points of law re standards for 12(b)(6) and proving agreement (1.0). Preparing drafts of response (1.8). Conferring by email with K. Srinivasan (.2).
49	5/11/2014	Srinivasan, Kalpana	Partner	LI09	2.8	500	$1,400.00	Revising and revising opposition to motion to dismiss at request of co-leads.
50	5/12/2014	Sklaver, Steven G.	Partner	LI08	5.5	625	$3,437.50	Reviewing and editing response to Toshiba's motion to dismiss as requested by co-leads.
51	5/13/2014	Srinivasan, Kalpana	Partner	LI09	1.5	500	$750.00	Revising opposition to motion to dismiss as requested by co-leads.
52	5/13/2014	Treistman, Katherine G.	Partner	LI01	6.2	600	$3,720.00	Researching points of law re motion for reconsideration as requested by co-leads (2.0). Researching points of law re standard on 12(b)(6) motions not requiring proof of facts as requested by co-leads (2.5). Reviewing amended complaints for factual citations to hundreds of in-person meetings between and among defendants as requested by co-leads (.7).
53	5/13/2014	Sklaver, Steven G.	Partner	LI11	1.5	625	$937.50	Conferring re motion to dismiss opposition as requested by co-leads.
54	5/13/2014	Seltzer, Marc M.	Partner	LI11	0.6	975	$585.00	Emailing to and from K. Srinivasan re in pari delicto issues in response to motion to dimsiss.
55	5/13/2014	Seltzer, Marc M.	Partner	LI11	0.8	975	$780.00	Further emailing with K. Srinivasan re in pari delicato arguments in response to motion to dismiss (.4). Further emailing re law an withdrawal from conspiracy in response to motion to dismiss (.4).
56	5/14/2014	Srinivasan, Kalpana	Partner	LI09	3.5	500	$1,750.00	Revising draft motion to dismiss and researching cases related to conspiracy withdrawal as requested by co-leads (1.0). Conferring with M. Seltzer re same (.5).
57	5/14/2014	Sklaver, Steven G.	Partner	LI09	4.5	625	$2,812.50	Reviewing, revising, and conferring re opposition to Toshiba motion to dismiss assignment from co-leads.
58	5/16/2014	Sklaver, Steven G.	Partner	LI09	4.5	625	$2,812.50	Conferring with co-leads re opposition to motion to dismiss re LG and going forward tasks to combine oppositions from directs and indirects and editing and revising re same.
59	5/17/2014	Srinivasan, Kalpana	Partner	LI09	3.2	500	$1,600.00	Editing and revising combined draft opposition to LG motion to dismiss on behalf of Indirect Purchaser Plaintiffs and Direct Purchaser Plaintiffs as requested by co-leads (1.5). Researching complaint citations as requested by co-leads (1.0). Reviewing motion to dismiss order and incorporating same into draft opposition as requested by co-leads (.7).
60	5/17/2014	Sklaver, Steven G.	Partner	LI08	3.5	625	$2,187.50	Revising, editing, and drafting opposition to LG subsidiary motion to dismiss as requested by co-leads.
61	5/21/2014	Sklaver, Steven G.	Partner	LI01	2.2	625	$1,375.00	Conferring with co-leads re request to edit opposition to motion to dismiss filed by LG subsidiary (1.2). Conferring re co-lead request re document review and editing opposition (1.0).

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
62	5/22/2014	Sklaver, Steven G.	Partner	LI08	6.5	625	$4,062.50	Revising, editing, and drafting opposition to LGCAI motion to dismiss as requested by co-leads.
63	5/22/2014	Srinivasan, Kalpana	Partner	LI09	1.3	500	$650.00	Reviewing and editing LGCAI opposition to motion to dismiss as requested by co-leads.
64	6/10/2014	Treistman, Katherine G.	Partner	LI07	1.8	350	$630.00	Reviewing manual on document review (1.0). Reviewing indirect purchaser petition (.8).
65	6/11/2014	Treistman, Katherine G.	Partner	LI07	3.5	350	$1,225.00	Reviewing Toshiba documents to support response to motion to dismiss (3.5).
66	6/12/2014	Treistman, Katherine G.	Partner	LI07	3.5	350	$1,225.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
67	6/13/2014	Treistman, Katherine G.	Partner	LI07	7.5	350	$2,625.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
68	6/14/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
69	6/16/2014	Treistman, Katherine G.	Partner	LI07	3.5	350	$1,225.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
70	6/17/2014	Treistman, Katherine G.	Partner	LI07	4.5	350	$1,575.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
71	6/18/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
72	6/19/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
73	6/20/2014	Treistman, Katherine G.	Partner	LI07	3	350	$1,050.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
74	6/23/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
75	6/24/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
76	6/25/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
77	6/26/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding Toshiba documents for purposes of responding to motions to dismiss and amending complaint.
78	6/27/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
79	6/30/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
80	7/1/2014	Treistman, Katherine G.	Partner	LI07	3	350	$1,050.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
81	7/7/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
82	7/9/2014	Treistman, Katherine G.	Partner	LI07	3	350	$1,050.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
83	7/10/2014	Hormann, Kevin C.	Staff Atty	LI09	4	275	$1,100.00	Reviewing materials in preparation for document review project.
84	7/10/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
85	7/11/2014	Hormann, Kevin C.	Staff Atty	LI09	1	275	$275.00	Reviewing materials in preparation for document review project (.7). Conferring via email with K. Treistman and cocounsel re same (.3).
86	7/11/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
87	7/12/2014	Treistman, Katherine G.	Partner	LI07	1	350	$350.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
88	7/13/2014	Treistman, Katherine G.	Partner	LI07	1	350	$350.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
89	7/14/2014	Hormann, Kevin C.	Staff Atty	LI09	2	275	$550.00	Reviewing materials in preparation for document review project (1.7). Conferring via email with cocounsel re same (.3).
90	7/16/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
91	7/17/2014	Treistman, Katherine G.	Partner	LI07	3.5	350	$1,225.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
92	7/18/2014	Treistman, Katherine G.	Partner	LI07	5.25	350	$1,837.50	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
93	7/21/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
94	7/22/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
95	7/23/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
96	7/24/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
97	7/25/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
98	7/26/2014	Treistman, Katherine G.	Partner	LI07	2.5	350	$875.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
99	7/27/2014	Treistman, Katherine G.	Partner	LI07	2.5	350	$875.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
100	7/28/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
101	7/29/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
102	7/30/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
103	7/31/2014	Treistman, Katherine G.	Partner	LI07	6	350	$2,100.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
104	8/4/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
105	8/5/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
106	8/6/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
107	8/7/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
108	8/8/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing and coding LG Chem documents for purposes of responding to motions to dismiss and amending complaint.
109	8/14/2014	Hormann, Kevin C.	Staff Atty	LI07	1.2	275	$330.00	Conferring via telephone conference with review team re status of document review project (.8). Reviewing materials in preparation for same (.4).
110	8/14/2014	Treistman, Katherine G.	Partner	LI07	0.8	350	$280.00	Conferring by phone with trial team re document review status and answering questions re same.
111	8/15/2014	Hormann, Kevin C.	Staff Atty	LI07	7	275	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
112	8/18/2014	Hormann, Kevin C.	Staff Atty	LI07	2	275	$550.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
113	8/18/2014	Treistman, Katherine G.	Partner	LI07	5.5	350	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
114	8/19/2014	Hormann, Kevin C.	Staff Atty	LI07	7.5	275	$2,062.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
115	8/19/2014	Treistman, Katherine G.	Partner	LI07	5.5	350	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
116	8/20/2014	Hormann, Kevin C.	Staff Atty	LI07	8.5	275	$2,337.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
117	8/20/2014	Treistman, Katherine G.	Partner	LI07	5.5	350	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
118	8/21/2014	Hormann, Kevin C.	Staff Atty	LI07	6.5	275	$1,787.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
119	8/21/2014	Treistman, Katherine G.	Partner	LI07	5.5	350	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
120	8/22/2014	Treistman, Katherine G.	Partner	LI07	5.5	350	$1,925.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
121	8/25/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
122	8/26/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
123	8/27/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
124	9/29/2014	Treistman, Katherine G.	Partner	LI07	0.5	350	$175.00	Reviewing updated materials supplied in advance of 9/30/2014 team review conference call.
125	9/30/2014	Treistman, Katherine G.	Partner	LI07	3.75	350	$1,312.50	Attending team conference call (.25). Reviewing and coding documents (3.5).
126	9/30/2014	Hormann, Kevin C.	Staff Atty	LI11	0.3	275	$82.50	Conferring via conference call with cocounsel re document review project.
127	10/1/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
128	10/2/2014	Treistman, Katherine G.	Partner	LI07	7	350	$2,450.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
129	10/3/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
130	10/5/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
131	10/6/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
132	10/7/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
133	10/8/2014	Treistman, Katherine G.	Partner	LI07	10	350	$3,500.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
134	10/9/2014	Treistman, Katherine G.	Partner	LI07	2.75	350	$962.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
135	10/10/2014	Treistman, Katherine G.	Partner	LI07	2.75	350	$962.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
136	10/11/2014	Treistman, Katherine G.	Partner	LI07	2.75	350	$962.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
137	10/12/2014	Treistman, Katherine G.	Partner	LI07	2.75	350	$962.50	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
138	10/13/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
139	10/14/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
140	10/15/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
141	10/16/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
142	10/17/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
143	10/20/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
144	10/21/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
145	10/22/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
146	10/23/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
147	10/24/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
148	10/27/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
149	10/28/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
150	10/29/2014	Treistman, Katherine G.	Partner	LI09	5	600	$3,000.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
151	10/30/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
152	10/31/2014	Treistman, Katherine G.	Partner	LI07	5	350	$1,750.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
153	11/3/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
154	11/4/2014	Treistman, Katherine G.	Partner	LI07	4.5	350	$1,575.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
155	11/5/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
156	11/6/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
157	11/7/2014	Treistman, Katherine G.	Partner	LI07	4	350	$1,400.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
158	11/10/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
159	11/11/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
160	11/12/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
161	11/13/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
162	11/14/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
163	11/24/2014	Treistman, Katherine G.	Partner	LI11	3	600	$1,800.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
164	11/25/2014	Treistman, Katherine G.	Partner	LI07	3	350	$1,050.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
165	11/26/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
166	11/28/2014	Treistman, Katherine G.	Partner	LI07	2	350	$700.00	Reviewing documents produced by Panasonic for purposes of responding to motions to dismiss and amending complaint.
167	12/2/2014	Treistman, Katherine G.	Partner	LI07	0.5	350	$175.00	Attending conference call re document review and coding issues.
168	12/23/2014	Treistman, Katherine G.	Partner	LI11	5	600	$3,000.00	Reviewing and conferring call with review team.
169	12/24/2014	Srinivasan, Kalpana	Partner	LI09	1.5	500	$750.00	Conferring with team regarding review of defendants' discovery responses (.5). Preparing spreadsheet summary of discovery topics and defendants (1.0).
170	12/24/2014	Sobczak, Dennis	Paralegal	LI11	1.2	270	$324.00	Preparing spreadsheet for use by counsel listing discovery requests and columns for responses.
171	12/29/2014	Hoek, Kathryn P.	Partner	LI09	3.1	525	$1,627.50	Reviewing discovery responses and summarizing defendants objections and responses per lead counsel's request.
172	12/30/2014	Srinivasan, Kalpana	Partner	LI09	3.2	500	$1,600.00	Reviewing Maxell Corp of America's responses to Plaintiff's Fourth Set of Requests for Production of Documents (1.0). Reviewing Samsung SDI's responses to Plaintiff's Fourth Set of Requests for Production of Documents (1.0). Summarizing responses and objections (1.2).
173	12/30/2014	Hoek, Kathryn P.	Partner	LI09	1.1	525	$577.50	Reviewing discovery responses and summarizing defendants objections and responses per lead counsel's request.
174	12/31/2014	Srinivasan, Kalpana	Partner	LI09	5.6	500	$2,800.00	Reviewing requests for production to Samsung, Sony and Toshiba (3.5). Preparing spreadsheet summary of responses and objections to same (2.1).
175	1/5/2015	Eccles, Lindsey Godfrey	Partner	LI09	0.1	500	$50.00	Reviewing email regarding meet and confer with defendants regarding discovery.
176	1/6/2015	Treistman, Katherine G.	Partner	LI07	0.5	350	$175.00	Attending document review conference call.
177	1/7/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring re meet and confer assignments re document productions 4 and 3 with co-lead and internally.
178	1/8/2015	Srinivasan, Kalpana	Partner	LI09	0.5	550	$275.00	Conferring with D. Lambrinos regarding meet and confers and discovery follow-up (.3). Conferring with team regarding same (.2).
179	1/12/2015	Srinivasan, Kalpana	Partner	LI03	0.5	550	$275.00	Reviewing meet and confer issues regarding discovery responses.
180	1/13/2015	Eccles, Lindsey Godfrey	Partner	LI09	0.1	500	$50.00	Emailing K. Srinivasan re meet and confer letters to defendants re discovery issues.
181	1/13/2015	Treistman, Katherine G.	Partner	LI07	0.3	350	$105.00	Attending document review conference call.
182	1/14/2015	Eccles, Lindsey Godfrey	Partner	LI09	2.2	500	$1,100.00	Revising request for production response spreadsheet to add Sanyo.
183	1/15/2015	Eccles, Lindsey Godfrey	Partner	LI09	1.4	500	$700.00	Revising request for production spreadsheet to add Sanyo.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
184	1/20/2015	Treistman, Katherine G.	Partner	LI07	0.6	350	$210.00	Conferring by phone with document review team (.2) Reviewing Sony documents from prior batches requiring completion (.4).
185	1/21/2015	Sobczak, Dennis	Paralegal	LI11	1.4	270	$378.00	Reviewing docket for companies represented by Winston Strawn (.6). Reviewing files and assembling discovery requests requested by counsel (.8).
186	1/21/2015	Hoek, Kathryn P.	Partner	LI06	2	600	$1,200.00	Preparing for and participating in conference call with DPPs counsel re upcoming meet and confer teleconferences with LG Chem and other defendants on responses to written discovery.
187	1/22/2015	Eccles, Lindsey Godfrey	Partner	LI09	0.3	500	$150.00	Reviewing defendants' requests for production response materials and related emails.
188	1/22/2015	Hoek, Kathryn P.	Partner	LI06	0.5	600	$300.00	Participating in teleconference with D. Lambrinos re strategy for upcoming meet and confer teleconferences with LG Chem and other defendants.
189	1/23/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.2	500	$1,600.00	Preparing for and participating in meet and confer.
190	1/23/2015	Hoek, Kathryn P.	Partner	LI09	2.2	600	$1,320.00	Preparing for and attending teleconference with counsel for LG Chem re responses to written discovery.
191	1/26/2015	Hoek, Kathryn P.	Partner	LI06	1.8	600	$1,080.00	Preparing for and participating in meet and confer teleconference with counsel for Hitachi-MCA (1.3) Drafting follow-up letter (.5).
192	1/26/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.9	500	$1,950.00	Preparing for and participating in meet and confer call (2.0). Reviewing draft LG Chemical meet and confer letter (1.0). Drafting Hitachi meet and confer letter (.9).
193	1/26/2015	Sobczak, Dennis	Paralegal	LI11	1.1	270	$297.00	Locating and assembling copies of pleadings and discovery responses requested by counsel for purposes of preparing for meet and confer with Hitachi.
194	1/27/2015	Sobczak, Dennis	Paralegal	LI11	0.8	270	$216.00	Locating and assembling copies of pleadings requested by counsel.
195	1/27/2015	Hoek, Kathryn P.	Partner	LI06	0.4	600	$240.00	Revising letter to defense counsel for Hitachi-MCA re meet and confer issues.
196	1/27/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.4	500	$1,700.00	Preparing for and participating in meet and confers with SDI and NEC (2.0). Researching custodian issue (.7). Revising and sending Hitachi letter (.7).
197	1/28/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.1	500	$550.00	Preparing for and participating in meet and confer with LG Chemical.
198	1/29/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.5	500	$750.00	Reviewing email re meet and confer (.3). Preparing for and participating in Sony meet and confer (1.2).
199	1/30/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.3	500	$150.00	Emailing re meet and confer with Sony re discovery responses.
200	2/2/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.2	500	$1,600.00	Preparing for and participating in meet and confer with Hitachi and sending follow-up email (1.5). Preparing for and participating in Panasonic/Sanyo meet and confer (1.7).
201	2/3/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.4	500	$1,700.00	Drafting Panasonic/Sanyo meet and confer letter.
202	2/4/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.5	500	$750.00	Revising Panasonic/Sanyo meet and confer letter (.5). Preparing for Hitachi meet and confer (.5). Preparing for meet and confer with NEC and Toshiba (.5).
203	2/4/2015	Sklaver, Steven G.	Partner	LI01	0.5	675	$337.50	Conferring re Toshiba interrogatory limits issues.
204	2/5/2015	Eccles, Lindsey Godfrey	Partner	LI06	4.1	500	$2,050.00	Revising Panasonic/Sanyo, SDI and Sony meet and confer letters. Preparing for Hitachi meet and confer.
205	2/6/2015	Eccles, Lindsey Godfrey	Partner	LI06	2.9	500	$1,450.00	Emailing trial team re meet and confer (.3). Revising Panasonic/Sanyo letter (.8). Drafting and revising Hitachi letter (.8).
206	2/9/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.3	500	$150.00	Participating in meet and confer with NEC.
207	2/12/2015	Eccles, Lindsey Godfrey	Partner	LI06	2.7	500	$1,350.00	Preparing for and participating in meet and confers with Panasonic/Sanyo.
208	2/13/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.6	500	$300.00	Preparing for and participating in meet and confer with Toshiba.
209	2/18/2015	Eccles, Lindsey Godfrey	Partner	LI06	1	500	$500.00	Reviewing cocounsel email re meet and confers.
210	2/20/2015	Eccles, Lindsey Godfrey	Partner	LI09	0.1	500	$50.00	Reviewing cocounsel email re Toshiba custodians.
211	2/23/2015	Eccles, Lindsey Godfrey	Partner	LI11	0.1	500	$50.00	Reviewing cocounsel email re meet and confers.
212	2/25/2015	Eccles, Lindsey Godfrey	Partner	LI06	4	500	$2,000.00	Preparing for and participating in meet and confers with Panasonic /Sanyo.
213	2/26/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.2	500	$100.00	Emailing cocounsel re meet and confers.
214	2/27/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.6	500	$300.00	Participating in Panasonic/Sanyo call re letter.
215	3/1/2015	Eccles, Lindsey Godfrey	Partner	LI09	1.3	500	$650.00	Preparing for Sony meet and confer.
216	3/2/2015	Eccles, Lindsey Godfrey	Partner	LI06	2.7	500	$1,350.00	Preparing for and participating in Sony meet and confer.
217	3/3/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.3	500	$150.00	Participating in LG Chemical meet and confer.
218	3/6/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.5	500	$750.00	Conferring with Plaintiffs' counsel re meet and confer (.5). Reviewing email re same (1.0).
219	3/9/2015	Eccles, Lindsey Godfrey	Partner	LI06	3.6	500	$1,800.00	Preparing for and participating in Panasonic/Sanyo meet and confer.
220	3/10/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.2	500	$100.00	Reviewing email re meet and confers with Panasonic/Sanyo.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
221	3/11/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.1	500	$550.00	Emailing and reviewing draft letter re meet and confer with Panasonic/Sanyo.
222	3/12/2015	Eccles, Lindsey Godfrey	Partner	LI09	2	500	$1,000.00	Reviewing discovery order.
223	3/13/2015	Eccles, Lindsey Godfrey	Partner	LI07	1.5	350	$525.00	Reviewing filings. Emailing re same.
224	3/17/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.7	500	$850.00	Reviewing filings re discovery and meet and confer letters.
225	3/18/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.6	500	$300.00	Reviewing email re meet and confers with Panasonic/Sanyo.
226	3/19/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.7	500	$850.00	Preparing for and participating in meet and confer with Panasonic/Sanyo.
227	3/23/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.4	500	$200.00	Emailing re meet and confers with Panasonic/Sanyo.
228	3/24/2015	Eccles, Lindsey Godfrey	Partner	LI06	2.4	500	$1,200.00	Preparing for and participating in meet and confers with Panasonic/Sanyo.
229	3/30/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.4	500	$200.00	Reviewing meet and confer related correspondence.
230	4/6/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.1	500	$550.00	Reviewing email re meet and confers with LG.
231	4/7/2015	Eccles, Lindsey Godfrey	Partner	LI06	1.3	500	$650.00	Participating in meet and confers with LG.
232	4/13/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.2	500	$100.00	Conferring with co-counsel re meet and confers and discovery issues.
233	4/15/2015	Eccles, Lindsey Godfrey	Partner	LI11	0.2	500	$100.00	Emailing re discovery issues.
234	4/16/2015	Eccles, Lindsey Godfrey	Partner	LI11	0.3	500	$150.00	Emailing re discovery issues.
235	4/21/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.4	500	$200.00	Reviewing email re meet and confers with Panasonic/Sanyo.
236	4/22/2015	Eccles, Lindsey Godfrey	Partner	LI06	2.4	500	$1,200.00	Sending email re meet and confers and discovery issues.
237	4/29/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.3	500	$150.00	Reviewing email re meet and confers with Sony.
238	5/27/2015	Sklaver, Steven G.	Partner	LI01	0.3	675	$202.50	Conferring re Japanese document review request.
239	6/1/2015	Sklaver, Steven G.	Partner	LI11	1	675	$675.00	Conferring with co-leads re Japanese document reviewers.
240	6/1/2015	Seltzer, Marc M.	Partner	LI11	0.4	975	$390.00	Emailing to and from S. Sklaver re document discovery issues.
241	6/2/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring with co-leads re Japanese document reviewers.
242	6/3/2015	Sklaver, Steven G.	Partner	LI09	1.2	675	$810.00	Handling Japanese document review translation assignment issues and coordination.
243	6/9/2015	Cobden, Jan	Paralegal	LI07	0.5	270	$135.00	Preparing and reviewing email (.2). Reviewing incoming correspondence seeking plaintiff, pleadings and routing to appropriate file (.3).
244	6/17/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	1.5	450	$675.00	Conducting conference call to receive training for Catalyst online document review database and discussed coding instructions and overview of Lithium Ion Battery matter.
245	6/17/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	1.5	450	$675.00	Conducting conference call to receive training for Catalyst online document review database and discussing coding instructions and overview of Lithium Ion Battery matter.
246	6/17/2015	Sklaver, Steven G.	Partner	LI11	1	675	$675.00	Conferring re document review project and assignment of Japanese translators.
247	6/18/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing IPP Merits Review Manual for background of case and coding instructions in Lithium Batteries matter.
248	6/18/2015	Seltzer, Marc M.	Partner	LI11	0.2	975	$195.00	Conferring with S. Sklaver re case status and work assignments.
249	6/19/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	0.5	450	$225.00	Reviewing List of Key Terms and other background materials received for Japanese language document review for the Lithium Batteries matter.
250	6/19/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reading the coding manual, complaint, and other materials necessary to understand the case and familiarize myself with the software
251	6/19/2015	Sklaver, Steven G.	Partner	LI01	1.5	675	$1,012.50	Conferring re New Hampshire plaintiff and document review issues for Japanese translators.
252	6/20/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	7	450	$3,150.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
253	6/20/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reading the coding manual, complaint, and other materials necessary to understand the case and familiarize myself with the software
254	6/20/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	7	450	$3,150.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
255	6/22/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
256	6/22/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
257	6/23/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	0.5	450	$225.00	Conducting conference call with foreign language team to discuss document review for Kubo/Toshiba deposition.
258	6/23/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	0.5	450	$225.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.

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259	6/23/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
260	6/23/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
261	6/24/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	1	450	$450.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
262	6/24/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
263	6/25/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
264	6/25/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
265	6/26/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2.5	450	$1,125.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
266	6/27/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	9	450	$4,050.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
267	6/27/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
268	6/29/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
269	6/29/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
270	6/30/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
271	6/30/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	0.5	450	$225.00	Conducting conference call to report the status of review of Kubo/Toshiba documents and discuss areas of improvement.
272	6/30/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	3.8	450	$1,710.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
273	6/30/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	0.3	450	$135.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0002.
274	7/1/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
275	7/2/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
276	7/3/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	9	450	$4,050.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
277	7/4/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	5.5	450	$2,475.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
278	7/5/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
279	7/6/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	8	450	$3,600.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
280	7/6/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
281	7/7/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	0.5	450	$225.00	Conducting a conference call to discuss the status of review of Kubo/Toshiba documents.
282	7/7/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	1.5	450	$675.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
283	7/7/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
284	7/8/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
285	7/8/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
286	7/9/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
287	7/9/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
288	7/10/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
289	7/11/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
290	7/12/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
291	7/13/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	5	450	$2,250.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
292	7/13/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
293	7/14/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
294	7/14/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
295	7/15/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
296	7/16/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
297	7/16/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
298	7/18/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	8	450	$3,600.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
299	7/18/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
300	7/19/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
301	7/20/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents for Kubo/Toshiba deposition in batch Toshiba, Kubo, Hiroshi 0012.
302	7/20/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
303	7/21/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
304	7/21/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
305	7/22/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
306	7/22/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
307	7/23/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
308	7/23/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
309	7/24/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
310	7/24/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
311	7/25/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	8	450	$3,600.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
312	7/27/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
313	7/27/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
314	7/28/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
315	7/28/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
316	7/29/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
317	7/29/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	REDACTED
318	7/29/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
319	7/30/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
320	7/30/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
321	7/31/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese-language documents in batch Sanyo, Matsumoto Takanao 0002.
322	7/31/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
323	8/1/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	5	450	$2,250.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
324	8/3/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
325	8/3/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
326	8/4/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	9	450	$4,050.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
327	8/4/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
328	8/4/2015	Sklaver, Steven G.	Partner	LI07	0.5	350	$175.00	Conferring re Japanese document review issues re Takeshima/NEC documents.
329	8/5/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
330	8/5/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
331	8/7/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
332	8/8/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	7	450	$3,150.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
333	8/9/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	9	450	$4,050.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
334	8/10/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
335	8/11/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
336	8/12/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
337	8/12/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
338	8/13/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
339	8/14/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
340	8/17/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
341	8/17/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
342	8/18/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
343	8/18/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
344	8/19/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
345	8/20/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
346	8/20/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
347	8/21/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
348	8/21/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
349	8/22/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	8	450	$3,600.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
350	8/24/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
351	8/24/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
352	8/25/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
353	8/25/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
354	8/26/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
355	8/26/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
356	8/27/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
357	8/27/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
358	8/28/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
359	8/28/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
360	8/31/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Takeshima/NEC deposition.
361	8/31/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
362	9/1/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
363	9/2/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
364	9/3/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	4	450	$1,800.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
365	9/4/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	3	450	$1,350.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
366	9/4/2015	Sklaver, Steven G.	Partner	LI07	0.5	350	$175.00	Conferring re document review assignment for Japanese reviewers re Tachihara/Sanyo documents.
367	9/5/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
368	9/8/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
369	9/8/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
370	9/9/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
371	9/9/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
372	9/10/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
373	9/10/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
374	9/11/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
375	9/11/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
376	9/12/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batch Maxell, Seiji Sumoto.
377	9/14/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
378	9/14/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
379	9/15/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
380	9/15/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
381	9/16/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
382	9/16/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
383	9/17/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
384	9/17/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
385	9/18/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
386	9/18/2015	Seltzer, Marc M.	Partner	LI11	0.4	975	$390.00	Emailing to and from K. Hoek, et al., re preparing for plaintiff's depositions and materials re same.
387	9/19/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
388	9/21/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing deposition emails and coordination for McGranhan and Lincoln in preparation of creating deposition tracking calendar.
389	9/21/2015	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Reviewing deposition emails and coordination for J. Goldstein in preparation of creating deposition tracking calendar.
390	9/21/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
391	9/21/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
392	9/21/2015	Sklaver, Steven G.	Partner	LI01	0.7	675	$472.50	Conferring re McGranahan deposition.
393	9/22/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
394	9/22/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
395	9/22/2015	Sklaver, Steven G.	Partner	LI11	0.8	675	$540.00	Conferring re McGranahan and Lincoln depositions.
396	9/23/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
397	9/23/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
398	9/24/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
399	9/24/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
400	9/24/2015	Sklaver, Steven G.	Partner	LI11	1	675	$675.00	Conferring re Linda Lincoln deposition and Florida class representative deposition.
401	9/25/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
402	9/25/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
403	9/25/2015	Sklaver, Steven G.	Partner	LI11	0.7	675	$472.50	Conferring re Michigan class representative deposition and discovery meet and confer re same.
404	9/28/2015	Sklaver, Steven G.	Partner	LI11	1	675	$675.00	Conferring re deposition scheduling issues (.5). Engaging in a conference call with co-leads re deposition preparation and scheduling (.5).
405	9/28/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
406	9/28/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
407	9/29/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
408	9/29/2015	Hoek, Kathryn P.	Partner	LI07	0.6	350	$210.00	Reviewing emails concerning depositions and discovery issues.

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
409	9/29/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring re deposition preparation for class representatives.
410	9/29/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
411	9/30/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
412	9/30/2015	Sklaver, Steven G.	Partner	LI11	2.5	675	$1,687.50	Conferring re class representative deposition preparation and coordination.
413	9/30/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
414	10/1/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
415	10/1/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
416	10/1/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring re class representative deposition scheduling.
417	10/2/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
418	10/2/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing deposition emails and coordination for R. McGranahan in preparation of creating deposition tracking calendar.
419	10/2/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing deposition emails and coordination for Molfetas in preparation of creating deposition tracking calendar.
420	10/2/2015	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Creating deposition tracking calendar with information extracted from multiple email correspondence for use during upcoming deposition and deposition preparation of plaintiffs.
421	10/2/2015	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Reviewing and updating email and correspondence electronic folders with information extracted from internal and external correspondence and documents.
422	10/2/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
423	10/2/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring re deposition preparation.
424	10/5/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
425	10/5/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
426	10/6/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
427	10/6/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
428	10/7/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
429	10/7/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
430	10/8/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
431	10/8/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
432	10/9/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
433	10/9/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
434	10/12/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
435	10/12/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
436	10/13/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
437	10/13/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
438	10/14/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
439	10/14/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
440	10/15/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
441	10/15/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
442	10/16/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
443	10/18/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
444	10/19/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
445	10/19/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
446	10/20/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
447	10/20/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
448	10/20/2015	Sklaver, Steven G.	Partner	LI11	3	675	$2,025.00	Conferring re class representative deposition preparation and coordination.
449	10/21/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
450	10/21/2015	Hoek, Kathryn P.	Partner	LI09	1.5	600	$900.00	Reviewing case materials in preparation for class member depositions.
451	10/21/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
452	10/21/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
453	10/21/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
454	10/21/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
455	10/21/2015	Sklaver, Steven G.	Partner	LI11	2	675	$1,350.00	Preparing for depositions and conferring re same.
456	10/22/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
457	10/22/2015	Hoek, Kathryn P.	Partner	LI11	0.5	600	$300.00	Reviewing and responding to emails discussing class member depositions.
458	10/22/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
459	10/22/2015	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
460	10/23/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
461	10/23/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
462	10/26/2015	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Reviewing, analyzing, issue-coding and translating Japanese language documents for Tachihara/Sanyo deposition
463	10/26/2015	Eccles, Lindsey Godfrey	Partner	LI01	0.5	500	$250.00	Conferring via email re legal research re REDACTED
464	10/26/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
465	10/26/2015	Hoek, Kathryn P.	Partner	LI11	1.7	600	$1,020.00	Conducting legal research regarding REDACTED for class member depositions (1.4). Reviewing emails and case materials (.3).
466	10/26/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
467	10/27/2015	Sklaver, Steven G.	Partner	LI11	3	675	$2,025.00	Preparing for L. Lincoln deposition including researching issues re REDACTED
468	10/27/2015	Eccles, Lindsey Godfrey	Partner	LI01	5.1	500	$2,550.00	Conducting legal research re REDACTED
469	10/27/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
470	10/27/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
471	10/28/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
472	10/28/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
473	10/28/2015	Sklaver, Steven G.	Partner	LI05	6	675	$4,050.00	Attending deposition telephonically of L. Lincoln (5.0) Drafting memorandum re same (1.0).
474	10/29/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
475	10/29/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
476	10/30/2015	Sato, Ken	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
477	10/30/2015	Hoek, Kathryn P.	Partner	LI09	1.5	600	$900.00	Reviewing materials in preparation for G. Molfetas deposition.
478	10/30/2015	Yagihashi, Hiroyuki	Staff Atty - Foreign Language	LI07	2	450	$900.00	Reviewing, analyzing, issue-coding and translating Japanese language documents in batches of unreviewed Tachihara docs for Tachihara/Sanyo deposition
479	11/2/2015	Eccles, Lindsey Godfrey	Partner	LI05	0.3	500	$150.00	Conferring via email re deposition preparation.
480	11/3/2015	Hoek, Kathryn P.	Partner	LI04	4.5	600	$2,700.00	Reviewing deposition transcript, case materials, and discovery responses in preparation for deposition of Florida class representative G. Molfetas.
481	11/4/2015	Eccles, Lindsey Godfrey	Partner	LI05	0.5	500	$250.00	Conferring via email and reviewing materials re McGranahan deposition.
482	11/5/2015	Eccles, Lindsey Godfrey	Partner	LI05	0.8	500	$400.00	Conferring via email re deposition (.2). Preparing for and attending deposition preparation (.6)
483	11/6/2015	Eccles, Lindsey Godfrey	Partner	LI05	5.1	500	$2,550.00	Preparing for class representative deposition.
484	11/8/2015	Hoek, Kathryn P.	Partner	LI05	2.5	600	$1,500.00	Attending via teleconference meeting with Florida class representative G. Molfetas.
485	11/9/2015	Hoek, Kathryn P.	Partner	LI04	9	600	$5,400.00	Attending deposition of Gerasimo Molfetas (7.9). Discussing deposition with counsel for witness (1.1).
486	11/9/2015	Eccles, Lindsey Godfrey	Partner	LI11	4.9	500	$2,450.00	Preparing witness for class representative deposition.
487	11/10/2015	Eccles, Lindsey Godfrey	Partner	LI11	10.4	500	$5,200.00	Traveling to Detroit for and preparing to defend class representative deposition.
488	11/10/2015	Hoek, Kathryn P.	Partner	LI09	2	600	$1,200.00	Reviewing rough transcript and preparing summary of deposition of Molfetas (1.0). Following up on issues raised during Molfetas deposition regarding document production and interrogatory responses (1.0).
489	11/11/2015	Sklaver, Steven G.	Partner	LI11	1.5	675	$1,012.50	Conferring re deposition of Michigan class representative and document supplementation and production.
490	11/11/2015	Eccles, Lindsey Godfrey	Partner	LI11	6.3	500	$3,150.00	Preparing class representative witness.
491	11/12/2015	Eccles, Lindsey Godfrey	Partner	LI11	9	500	$4,500.00	Defending class representative deposition.
492	11/12/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Conferring re Michigan deposition and document production.
493	11/13/2015	Eccles, Lindsey Godfrey	Partner	LI11	8.3	500	$4,150.00	Traveling from and drafting email regarding class representative deposition.
494	11/16/2015	Eccles, Lindsey Godfrey	Partner	LI05	2.2	500	$1,100.00	Drafting and reviewing emails re class representative deposition.
495	11/16/2015	Hoek, Kathryn P.	Partner	LI04	0.5	600	$300.00	Reviewing and responding to emails regarding class member depositions.
496	11/16/2015	Mata, Kenneth	Paralegal	LI09	0.4	225	$90.00	Reviewing received transcript and exhibits from the deposition of G. Molfetas (.2). Updating electronic files re same (.2).
497	11/17/2015	Eccles, Lindsey Godfrey	Partner	LI05	0.3	500	$150.00	Conferring via email re class representative deposition and following up.
498	11/17/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.3	500	$150.00	Attending teleconference re amending discovery responses.
499	11/18/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.1	500	$50.00	Conferring via email re interrogatory responses.
500	11/19/2015	Eccles, Lindsey Godfrey	Partner	LI06	0.1	500	$50.00	Conferring via email re interrogatory responses.
501	11/20/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.7	500	$350.00	Revising interrogatory responses and conferring via email re same.
502	11/23/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.6	500	$300.00	Revising interrogatory responses and conferring via email re same.
503	11/30/2015	Sklaver, Steven G.	Partner	LI11	0.6	675	$405.00	Conferring with referring counsel for class representative deposition.
504	12/1/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.2	500	$100.00	Conferring via email re interrogatory responses.
505	12/2/2015	Mata, Kenneth	Paralegal	LI09	0.4	225	$90.00	Reviewing received transcript and exhibits from the deposition of R. McGranahan (.2). Updating electronic files re same (.2).
506	12/2/2015	Sklaver, Steven G.	Partner	LI05	1.5	675	$1,012.50	Conferring re deposition coordination for class representatives.

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507	12/3/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.3	500	$150.00	Conferring via email and telephone with J. Cuneo re interrogatory responses.
508	12/7/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.3	500	$150.00	Revising interrogatory responses and conferring via email re same.
509	12/9/2015	Hoek, Kathryn P.	Partner	LI04	0.2	600	$120.00	Reviewing and responding to emails regarding class rep depositions.
510	12/10/2015	Hoek, Kathryn P.	Partner	LI04	1.5	600	$900.00	Coordinating class rep depositions and reviewing case materials.
511	12/10/2015	Eccles, Lindsey Godfrey	Partner	LI03	0.2	500	$100.00	Conferring via email re interrogatory responses and battery issue.
512	12/11/2015	Hoek, Kathryn P.	Partner	LI04	0.8	600	$480.00	Reviewing emails and coordinating depositions of class representatives (.5). Following up on issues raised in deposition of Molfetas (.3).
513	12/14/2015	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Updating deposition calendar with information extracted from deposition scheduling information.
514	12/15/2015	Eccles, Lindsey Godfrey	Partner	LI05	0.1	500	$50.00	Conferring via email re class representative deposition.
515	12/24/2015	Sklaver, Steven G.	Partner	LI05	2.5	675	$1,687.50	Coordinating depositions for class representatives and related preparation work and conferring with referring counsel re same.
516	12/28/2015	Sklaver, Steven G.	Partner	LI11	0.5	675	$337.50	Coordinating depositions of class representatives.
517	12/28/2015	Hoek, Kathryn P.	Partner	LI07	1.5	350	$525.00	Coordinating class member depositions (.8). Reviewing correspondence and case materials (.7).
518	12/30/2015	Hoek, Kathryn P.	Partner	LI05	1	600	$600.00	Coordinating class member depositions (.5). Reviewing correspondence and case materials (.5).
519	1/4/2016	Sklaver, Steven G.	Partner	LI11	5.5	700	$3,850.00	Conferring re deposition scheduling (2.0). Meeting and conferring with defendants re discovery responses and document production and new class representative issues given proposed potential modification of class definition (3.5).
520	1/4/2016	Hoek, Kathryn P.	Partner	LI11	1.2	600	$720.00	Reviewing and responding to emails (.7). Coordinating depositions of class representatives (.5).
521	1/4/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.1	550	$55.00	Conferring via email re class representative deposition preparation.
522	1/5/2016	Hoek, Kathryn P.	Partner	LI11	1.5	600	$900.00	Coordinating depositions of class representatives and conferring with referring counsel (.5). Investigating product purchases for purposes of determining whether existing class representatives will remain in class (.5). Preparing deposition outline (.5).
523	1/5/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.5	550	$275.00	Attending weekly conference call.
524	1/5/2016	Pachman, Krysta K.	Associate	LI10	0.5	375	$187.50	Participating in call with REDACTED
525	1/5/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing class reps deposition chart and extracting information related to upcoming depositions re same.
526	1/6/2016	Hoek, Kathryn P.	Partner	LI11	1.1	600	$660.00	Coordinating depositions of class representatives (.5). Investigating product purchases for purposes of determining whether existing class representatives will remain in class (.6).
527	1/6/2016	Eccles, Lindsey Godfrey	Partner	LI05	1.5	550	$825.00	Drafting class representative deposition preparation outline (1.1). Conferring via email re class representative depositions (.4).
528	1/6/2016	Sklaver, Steven G.	Partner	LI11	3.5	700	$2,450.00	Coordinating depositions (1.0). Attending telephonic preparation session for plaintiff D. Tolchin (2.0). Reviewing correspondence re discovery disputes from class representatives (.5).
529	1/6/2016	Pachman, Krysta K.	Associate	LI01	0.4	375	$150.00	Researching legal issues re REDACTED
530	1/6/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling multiple transcripts of depositions for attorney review.
531	1/7/2016	Eccles, Lindsey Godfrey	Partner	LI05	4	550	$2,200.00	Attending deposition preparation coordination call (2.0). Attending to deposition preparation (2.0).
532	1/7/2016	Sklaver, Steven G.	Partner	LI11	4	700	$2,800.00	Coordinating depositions, document production (2.5). Responding to meet and confer issues (1.5).
533	1/7/2016	Hoek, Kathryn P.	Partner	LI05	1.7	600	$1,020.00	Reviewing documents and coordinating depositions of class representatives (.5). Investigating purchases of class representatives to ascertain whether they remain in the newly proposed class (.7). Reviewing and responding to emails (.5).
534	1/7/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Reviewing all documents related to S. Harmon for information related to specifically identified laptop (.2). Updating trial team of results re same (.2).
535	1/8/2016	Eccles, Lindsey Godfrey	Partner	LI05	2.3	550	$1,265.00	Conferring via email re class representative depositions (.5). Attending to preparation materials and other class representative issues (1.8).
536	1/8/2016	Hoek, Kathryn P.	Partner	LI05	1.9	600	$1,140.00	Reviewing documents and coordinating depositions of class representatives (.5). Investigating purchases of class representatives to ascertain whether they remain in the newly proposed class (1.0). Reviewing and responding to emails (.4).
537	1/8/2016	Pachman, Krysta K.	Associate	LI05	0.5	375	$187.50	Discussing deposition prep with S. Sklaver and K. Srinivasan (.3). Reviewing emails re same (.2).

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1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
538	1/8/2016	Mata, Kenneth	Paralegal	LI07	1.1	225	$247.50	Compiling all pleadings and discovery responses produced for each class representative in preparation of updating electronic files and creating deposition preparation folders for same.
539	1/8/2016	Srinivasan, Kalpana	Partner	LI04	0.5	550	$275.00	Attending call with team regarding deposition coordination.
540	1/9/2016	Eccles, Lindsey Godfrey	Partner	LI05	1.9	550	$1,045.00	Traveling to South Dakota and preparing for Bessette deposition preparation.
541	1/9/2016	Pachman, Krysta K.	Associate	LI05	3	375	$1,125.00	Preparing for Cabral deposition.
542	1/11/2016	Pachman, Krysta K.	Associate	LI05	6.8	375	$2,550.00	Preparing for Cabral deposition.
543	1/11/2016	Hoek, Kathryn P.	Partner	LI05	4.2	600	$2,520.00	Coordinating depositions of class representatives (.5). Reviewing deposition transcripts for other class representatives and preparing outline for meetings with class representatives to be deposed (2.0). Reviewing discovery from class representatives whose depositions have been requested to ensure all responsive non-privileged materials have been produced, and following up on issues raised by review (.5). Preparing materials for referring counsel for class representatives whose depositions have been requested (.5). Reviewing and responding to emails to/from co-leads and defense counsel regarding discovery issues (.7).
544	1/11/2016	Eccles, Lindsey Godfrey	Partner	LI05	14.5	550	$7,975.00	Traveling to South Dakota and preparing for Bessette deposition preparation (8.0). Attending deposition preparation for Bessette (6.5).
545	1/11/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Reviewing of entire discovery folder for Tolchin and identify duplicate and missing items in preparation of upcoming deposition (.2). Updating trial team of result re same (.1).
546	1/11/2016	Sklaver, Steven G.	Partner	LI11	2	700	$1,400.00	Conferring re Utah representative and receipt proof (.5). Preparing for Tolchin deposition (1.0). Reviewing notice of Cabral deposition and interrogatory answers for preparation and direct examinations for document production issues (.5).
547	1/12/2016	Hoek, Kathryn P.	Partner	LI05	5.9	600	$3,540.00	Coordinating depositions of class representatives (.2). Preparing materials for referring counsel for class representatives whose depositions have been requested (.5). Reviewing and responding to emails to/from co-leads and defense counsel regarding discovery issues (.3). Attending telephonic conference with K. Scanlan (counsel for Richard Johns) to discuss case background and deposition (1.5). Attending telephonic conference with L. Hogan (counsel for David Tolchin) and D. Tolchin in preparation for deposition (2.5). Conferring with counsel for D. Tolchin regarding document production, and reviewing and preparing additional materials for production (.9).
548	1/12/2016	Eccles, Lindsey Godfrey	Partner	LI05	9.4	550	$5,170.00	Defending Bessette deposition (8.4). Conferring via email re class representative depositions (1.0).
549	1/12/2016	Pachman, Krysta K.	Associate	LI05	13.7	375	$5,137.50	Traveling to Boston for W. Cabral deposition (8.0). Participating in telephonic prep for W. Cabral deposition (4.0). Preparing for W. Cabral deposition (1.7).
550	1/12/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Preparing redacted and un-redacted versions of documents related to Tolchin identified for service on opposing counsel in preparation for use during upcoming deposition re same.
551	1/12/2016	Sklaver, Steven G.	Partner	LI11	2	700	$1,400.00	Conferring re Cabral serial numbers and photos and Tolchin AmEx receipts, new Utah representative and Molfetas document collection.
552	1/13/2016	Hoek, Kathryn P.	Partner	LI05	1.8	600	$1,080.00	Coordinating depositions of class representatives (.3). Preparing materials for referring counsel for class representatives whose depositions have been requested (.5). Reviewing and responding to emails to/from co-leads and defense counsel regarding discovery issues (.2). Reviewing and preparing additional materials for production (.8).
553	1/13/2016	Eccles, Lindsey Godfrey	Partner	LI05	10.2	550	$5,610.00	Traveling back to Seattle from defending Bessette deposition and preparing summary and follow-up while traveling.
554	1/13/2016	Pachman, Krysta K.	Associate	LI05	4.1	375	$1,537.50	Traveling to and attending W. Cabral prep (3.6). Emailing re document production and protective order (.5).
555	1/13/2016	Srinivasan, Kalpana	Partner	LI01	0.4	550	$220.00	Attending call with IPP governmental entities.
556	1/13/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Preparing redacted and un-redacted versions of documents related to Cabaral identified for service on opposing counsel in preparation for use during upcoming deposition re same.
557	1/13/2016	Sklaver, Steven G.	Partner	LI05	3	700	$2,100.00	Conferring re Cabral protective order signature, deposition preparation and Hunt and Sellers depositions (2.0). Conferring re meet and confer demand from Toshiba (1.0).
558	1/14/2016	Sklaver, Steven G.	Partner	LI07	4.5	350	$1,575.00	Conferring re deposition of Cabral and document production issues (1.5). Engaging Kansas representative (1.0). Coordinating document collection issues and responding to demands of opposing counsel re motion to compel and deposition scheduling and dismissing class reps based on amended complaint (2.0).
559	1/14/2016	Hoek, Kathryn P.	Partner	LI05	6.5	600	$3,900.00	Attending deposition of D. Tolchin (5.8) and preparing summary (.7).
560	1/14/2016	Eccles, Lindsey Godfrey	Partner	LI05	1.7	550	$935.00	Drafting class representative letter and conferring via email re same (.8). Reviewing LCD deposition transcript (.9)

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561	1/14/2016	Pachman, Krysta K.	Associate	LI05	11.8	375	$4,425.00	Driving to/from Cabral deposition (2.5). Attending Cabral deposition (8.0). Emailing re Cabral deposition (1.3).
562	1/14/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Preparing redacted and un-redacted versions of documents related to Tolchin identified for service on opposing counsel in preparation for use during upcoming deposition re same.
563	1/15/2016	Hoek, Kathryn P.	Partner	LI05	1.5	600	$900.00	Reviewing and responding to emails (.5). Preparing for depositions of class representatives R. Johns (1.0).
564	1/15/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.5	550	$275.00	Conferring via email re class representative depositions.
565	1/15/2016	Pachman, Krysta K.	Associate	LI05	8.2	375	$3,075.00	Traveling to LA from Boston from W. Cabral deposition.
566	1/19/2016	Srinivasan, Kalpana	Partner	LI09	1	550	$550.00	Reviewing opposition to motion to compel (.5). Conferring with team regarding deposition issues (.5).
567	1/19/2016	Eccles, Lindsey Godfrey	Partner	LI03	4.2	550	$2,310.00	Attending to class representative depositions, inclusive of scheduling and preparation, and motion to compel briefing.
568	1/19/2016	Hoek, Kathryn P.	Partner	LI05	2.2	600	$1,320.00	Preparing for and attending telephone deposition preparation meeting of class representative.
569	1/19/2016	Pachman, Krysta K.	Associate	LI11	8.8	375	$3,300.00	Emailing re deposition scheduling (0.5). Preparing plaintiff's portion of joint letter brief re motion to compel (8.3).
570	1/19/2016	Mata, Kenneth	Paralegal	LI07	1.2	225	$270.00	Extracting, editing and uploading discovery documents for all class representatives.
571	1/19/2016	Sklaver, Steven G.	Partner	LI08	3.5	700	$2,450.00	Drafting and revising motion to compel (3.0) .Deposition scheduling (.5).
572	1/20/2016	Eccles, Lindsey Godfrey	Partner	LI03	5.3	550	$2,915.00	Attending to class representative depositions and motion to compel.
573	1/20/2016	Hoek, Kathryn P.	Partner	LI05	0.9	600	$540.00	Following up on issues raised in depositions of class representatives Molfetas and Tolchin (.5). Reviewing files for R. Johns to confirm whether production was complete (.2). Reviewing and responding to emails (.2)
574	1/20/2016	Pachman, Krysta K.	Associate	LI02	11.2	375	$4,200.00	Preparing discovery letter brief.
575	1/20/2016	Mata, Kenneth	Paralegal	LI03	0.4	225	$90.00	Preparing documents re Molfetas identified for service production (.3). Updating production log re same (.1).
576	1/20/2016	Sklaver, Steven G.	Partner	LI11	0.8	700	$560.00	Conferring re class representative discovery issues.
577	1/21/2016	Eccles, Lindsey Godfrey	Partner	LI03	3.3	550	$1,815.00	Attending to class representative deposition preparation and motion to compel (1.0). Attending Johns deposition preparation (2.3).
578	1/21/2016	Mata, Kenneth	Paralegal	LI07	1.3	225	$292.50	Extracting, editing and preparing of documents identified in 1/21/16 correspondence from opposing counsel re production of documents in accordance with standing order (1.0). Coordinating with local vendor re same (.3).
579	1/21/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Corresponding with co-counsel and third party vendor re collection of final deposition transcript and exhibits.
580	1/21/2016	Hoek, Kathryn P.	Partner	LI05	1.5	600	$900.00	Preparing for deposition of R. Johns and addressing discovery issues related thereto.
581	1/21/2016	Pachman, Krysta K.	Associate	LI09	8.8	375	$3,300.00	Reviewing and responding to emails re deposition scheduling (1.5). Reviewing and revising motion to compel (5.0). Participating in call with D. Fennelly re: retention agreement (1.5). Revising retention agreement (.8)
582	1/21/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Extracting and compiling all discovery documents for use in support of upcoming discovery brief letter.
583	1/21/2016	Mata, Kenneth	Paralegal	LI03	0.4	225	$90.00	Preparing documents re R. Johns identified for service production (.3). Updating production log re same (.1).
584	1/21/2016	Sklaver, Steven G.	Partner	LI11	2.5	700	$1,750.00	Editing drafts re motions to compel (2.0). Conferring re deposition scheduling, document production, and engagement agreement (.5).
585	1/22/2016	Eccles, Lindsey Godfrey	Partner	LI05	8.1	550	$4,455.00	Attending to class rep depositions and conferring re same (1.0). Attending Johns deposition (6.0). Reviewing filings (1.1).
586	1/22/2016	Hoek, Kathryn P.	Partner	LI05	0.6	600	$360.00	Addressing issues arising in deposition of R. Johns (.3). Reviewing and responding to emails (.3)
587	1/22/2016	Pachman, Krysta K.	Associate	LI08	4	375	$1,500.00	Reviewing and revising motion to compel.
588	1/23/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.9	550	$495.00	Drafting summary of Johns deposition (.5). Conferring via email re revising interrogatories (.2). Reviewing pleadings (.2).
589	1/23/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re deposition of Johns and report to co-leads re same.
590	1/24/2016	Eccles, Lindsey Godfrey	Partner	LI10	0.4	550	$220.00	Attending to class certification briefing and class representative depositions.
591	1/24/2016	Pachman, Krysta K.	Associate	LI09	0.7	375	$262.50	Reviewing motion for class certification (.4). Reviewing emails re deposition summaries (.2). Revising deposition prep outline (.1).
592	1/25/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re deposition schedules.

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593	1/25/2016	Pachman, Krysta K.	Associate	LI11	2.7	375	$1,012.50	Emailing re scheduling class rep depositions (.5). Emailing re production log (.5). Emailing re deposition prep (.5). Revising retention letter (.2). Participating in calls with C. Cleary and D. Lambrinos re deposition scheduling (1.0).
594	1/25/2016	Eccles, Lindsey Godfrey	Partner	LI09	5.5	550	$3,025.00	Attending to class representative depositions (.8). Revising interrogatory responses (.5). Conferring via email re class certification motion (.5). Attending Sellers telephonic deposition preparation (3.7).
595	1/25/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Extracting transcripts and exhibits from repository from the deposition of R. McGranahan (.3). Uploading to local files re same (.1).
596	1/25/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Corresponding and uploading of all deposition transcripts with co-counsel for use and review.
597	1/25/2016	Hoek, Kathryn P.	Partner	LI09	1.9	600	$1,140.00	Reviewing correspondence (.4). Reviewing discovery responses and document productions of R. Johns to identify any areas for supplementation (1.5).
598	1/26/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.1	550	$55.00	Conferring via email re class representative depositions.
599	1/26/2016	Mata, Kenneth	Paralegal	LI07	0.6	225	$135.00	Updating local files with all pleadings and orders received from electronic court notifications for review.
600	1/26/2016	Pachman, Krysta K.	Associate	LI05	0.6	375	$225.00	Emailing re deposition scheduling.
601	1/27/2016	Eccles, Lindsey Godfrey	Partner	LI05	1	550	$550.00	Attending to class representative depositions.
602	1/27/2016	Mata, Kenneth	Paralegal	LI07	0.6	225	$135.00	Compiling and extracting multiple emails and documents identified for review from discovery letter brief (.4). Uploading results to trial team re same (.2)
603	1/27/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re Utah representative and related discovery.
604	1/27/2016	Hoek, Kathryn P.	Partner	LI07	1.3	350	$455.00	Reviewing correspondence re deposition of D. Tolchin (.3). Reviewing discovery responses and document productions to identify any areas for supplementation for D. Tolchin (.8). Preparing supplemental discovery response for D. Tolchin (.2).
605	1/27/2016	Pachman, Krysta K.	Associate	LI09	8.6	375	$3,225.00	Reviewing G. Murphy materials (1.5). Conferring with G. Murphy re discovery (.5). Conferring with J. Pankow re discovery (1.0). Conferring with C. Booze re discovery (1.0). Coordinating depositions and discovery for class plaintiffs (4.6).
606	1/28/2016	Eccles, Lindsey Godfrey	Partner	LI05	1.3	550	$715.00	Attending to class representative depositions and document production.
607	1/28/2016	Hoek, Kathryn P.	Partner	LI09	0.9	600	$540.00	Reviewing correspondence (.3). Reviewing discovery responses and document productions by B. Van Patten to identify any areas for supplementation (.2). Preparing for deposition of B. Van Patten (.4).
608	1/28/2016	Pachman, Krysta K.	Associate	LI05	7	375	$2,625.00	Conferring with J. Gerard Stranch re deposition scheduling (.5). Conferring with J. Jasnoch re deposition scheduling (.5). Conferring with M. Ence re discovery and deposition (1.0). Coordinating depositions and discovery (5.0).
609	1/29/2016	Eccles, Lindsey Godfrey	Partner	LI04	2	550	$1,100.00	Attending to class representative depositions and document productions.
610	1/29/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.6	550	$330.00	Conferring via email re class representative depositions and document productions.
611	1/29/2016	Mata, Kenneth	Paralegal	LI07	1.2	225	$270.00	Preparing and coordinating with local vendor re multiple documents related to S. Seller identified for service prior to upcoming deposition re same.
612	1/29/2016	Hoek, Kathryn P.	Partner	LI11	0.4	600	$240.00	Reviewing correspondence and case materials to prepare for deposition of B. Van Patten.
613	1/29/2016	Pachman, Krysta K.	Associate	LI05	4.6	375	$1,725.00	Coordinating deposition schedules and discovery.
614	2/1/2016	Eccles, Lindsey Godfrey	Partner	LI05	8.2	550	$4,510.00	Conferring via email and preparing draft letter to opposing counsel re class representative depositions and document production (2.0). Traveling to Phoenix for Hunt and Sellers depositions and preparation of same (6.2).
615	2/1/2016	Pachman, Krysta K.	Associate	LI05	8.1	375	$3,037.50	Coordinating deposition schedules and discovery.
616	2/1/2016	Hoek, Kathryn P.	Partner	LI05	2.2	600	$1,320.00	Reviewing and responding to emails (.2). Reviewing case materials and deposition transcripts (.5). Preparing for B. Van Patten deposition (1.5).
617	2/1/2016	Mata, Kenneth	Paralegal	LI07	1.1	225	$247.50	Updating electronic and discovery files of class representatives with multiple documents in preparation of upcoming document production.
618	2/1/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Compiling and redacting police report for C. Hunt in preparation of upcoming document production (.6). Updating production log re same (.1).
619	2/2/2016	Eccles, Lindsey Godfrey	Partner	LI05	6.1	550	$3,355.00	Preparing Hunt and Sellers for deposition (5.5). Conferring via email re class rep depositions and document productions (.6).
620	2/2/2016	Pachman, Krysta K.	Associate	LI05	4.6	375	$1,725.00	Coordinating deposition schedules and discovery.
621	2/2/2016	Hoek, Kathryn P.	Partner	LI05	2.9	600	$1,740.00	Reviewing and responding to emails (.3). Preparing for B. Van Patten deposition (2.0). Preparing revised discovery responses for D. Tolchin (.6).
622	2/2/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Compiling and updating of electronic document pleading folders with documents received from electronic court notices.

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623	2/2/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Updating production log with information extracted from previous productions.
624	2/2/2016	Sklaver, Steven G.	Partner	LI11	2.2	700	$1,540.00	Conferring re class representative deposition issues and preparation for depositions and proposed amended complaint.
625	2/3/2016	Eccles, Lindsey Godfrey	Partner	LI05	8.6	550	$4,730.00	Defending Sellers class representative deposition (8.0). Preparing summary and conferring via email re same (.6).
626	2/3/2016	Pachman, Krysta K.	Associate	LI03	7.2	375	$2,700.00	Preparing discovery responses (4.5). Coordinating discovery (2.7).
627	2/3/2016	Sklaver, Steven G.	Partner	LI11	1	700	$700.00	Conferring re deposition summaries and MacBook Pro cylindrical battery issues.
628	2/4/2016	Eccles, Lindsey Godfrey	Partner	LI05	15.2	550	$8,360.00	Defending Hunt class representative deposition (8.0). Conferring via email re class representatives (.5). Traveling back to Seattle (6.7).
629	2/4/2016	Pachman, Krysta K.	Associate	LI05	1.8	375	$675.00	Coordinating deposition schedules.
630	2/4/2016	Hoek, Kathryn P.	Partner	LI04	6.3	600	$3,780.00	Attending deposition of B. Van Patten (6.0). Reviewing and responding to emails and reviewing communications from defense counsel regarding discovery issues (.3).
631	2/4/2016	Sklaver, Steven G.	Partner	LI11	1.2	700	$840.00	Conferring re macbook pro cylindrical battery issues.
632	2/5/2016	Pachman, Krysta K.	Associate	LI05	2.1	375	$787.50	Reviewing case management statement (.5). Reviewing response to motion for leave to amend (.5). Coordinating deposition schedules and discovery (1.1).
633	2/5/2016	Hoek, Kathryn P.	Partner	LI03	0.8	600	$480.00	Reviewing communications and emails (.4). Preparing revised discovery responses for B. Van Patten (.4).
634	2/6/2016	Pachman, Krysta K.	Associate	LI05	0.4	375	$150.00	Coordinating deposition schedules and discovery.
635	2/7/2016	Pachman, Krysta K.	Associate	LI05	5.8	375	$2,175.00	Coordinating deposition schedules and discovery.
636	2/8/2016	Pachman, Krysta K.	Associate	LI05	7.1	375	$2,662.50	Coordinating deposition schedules and discovery.
637	2/8/2016	Lee, Vanessa	IT Assistant	LI07	1	125	$125.00	Creating load files, tiffs, and associated text files for a set of PDF files.
638	2/8/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.7	550	$935.00	Conferring via email re class representative issues (1.0). Reviewing case management statement (.7)
639	2/8/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Researching and compiling all complaints in case management file for attorney use and review in response to discovery correspondence.
640	2/8/2016	Mata, Kenneth	Paralegal	LI07	1	225	$225.00	Compiling and preparing multiple documents identified for upcoming document production (.9). Assisting with creating of load file re same (.1).
641	2/9/2016	Eccles, Lindsey Godfrey	Partner	LI11	3.1	550	$1,705.00	Conferring via email re class representative issues (1.0). Reviewing case management statement (.5). Reviewing Seller deposition (1.6)
642	2/9/2016	Hoek, Kathryn P.	Partner	LI11	0.5	600	$300.00	Reviewing case communications and materials.
643	2/9/2016	Pachman, Krysta K.	Associate	LI09	2.3	375	$862.50	Coordinating discovery.
644	2/9/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Revising and preparing documents identified for upcoming document production (.3). Assisting with creating of load file re same (.1).
645	2/9/2016	Sklaver, Steven G.	Partner	LI11	1.8	700	$1,260.00	Conferring re Palo Alto deposition, apple purchases, S. Bugee deposition, and departing class representative deposition issues.
646	2/10/2016	Eccles, Lindsey Godfrey	Partner	LI10	2	550	$1,100.00	Contacting referring counsel and conferring via email re same (1.0). Attending to class representative issues (1.0).
647	2/10/2016	Pachman, Krysta K.	Associate	LI04	9.3	375	$3,487.50	Participating in calls with opposing counsel re deposition scheduling (1.5). Coordinating deposition scheduling (7.8).
648	2/10/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re mac purchases of class representatives and chart re same.
649	2/11/2016	Eccles, Lindsey Godfrey	Partner	LI03	1	550	$550.00	Revising Hunt interrogatory responses (.5). Conferring via email re class representative issues (.5).
650	2/11/2016	Pachman, Krysta K.	Associate	LI04	6.6	375	$2,475.00	Participating in meet and confer with opposing counsel re discovery and emails re same (3.5). Coordinating depositions and discovery (3.1).
651	2/11/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re settlement agreement discovery dispute and related briefing in LCD matter and issues for opposing counsel on the issue.
652	2/12/2016	Pachman, Krysta K.	Associate	LI04	5.6	375	$2,100.00	Coordinating depositions and discovery.
653	2/13/2016	Pachman, Krysta K.	Associate	LI04	0.2	375	$75.00	Emailing re discovery collection.
654	2/15/2016	Pachman, Krysta K.	Associate	LI04	7.4	375	$2,775.00	Preparing interrogatory responses. Participating in telephonic prep with G. Murphy. Coordinating discovery responses.
655	2/15/2016	Sklaver, Steven G.	Partner	LI11	1.2	700	$840.00	Editing letter to H. Abrams re discovery disputes and conferring re same.
656	2/15/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling and preparing documents related to class representative Uehara for production (.2). Uploading production results to trail team re same (.1).
657	2/15/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to class representative Fennelly for production (.3). Uploading production results to trial team re same (.1).

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658	2/15/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling and preparing documents related to class representatives Murphy and for production (.2) Uploading production results to trail team re same (.1)
659	2/15/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling and preparing documents related to class representative Pankow for production (.2). Uploading production results to trail team re same (.1).
660	2/16/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re deposition and discovery issues.
661	2/16/2016	Eccles, Lindsey Godfrey	Partner	LI03	0.6	550	$330.00	Conferring via email re class representative depositions and other issues (.2). Reviewing letter to Abrams (.2). Revising interrogatory responses (.2).
662	2/16/2016	Pachman, Krysta K.	Associate	LI05	11.2	375	$4,200.00	Traveling to San Francisco for Ames deposition (4.0). Attending Ames depo prep (4.0). Coordinating discovery (3.2).
663	2/16/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Extracting multiple documents received from class representative McGuiness in preparation of document production.
664	2/16/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to class representative McGuiness for production (.3). Uploading production results to trail team re same (.1).
665	2/17/2016	Pachman, Krysta K.	Associate	LI05	12.8	375	$4,800.00	Attending deposition of Jason Ames (7.0). Summarizing Ames deposition (1.0). Coordinating discovery (1.8). Traveling to Los Angeles from Ames deposition (3.0).
666	2/17/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to class representatives Booze and for production (.3). Uploading production results to trail team re same (.1).
667	2/18/2016	Eccles, Lindsey Godfrey	Partner	LI10	2	550	$1,100.00	Attending to class representative issues.
668	2/18/2016	Pachman, Krysta K.	Associate	LI05	11.2	375	$4,200.00	Preparing for Gail Murphy prep (3.0). Attending Gail Murphy prep (5.0). Coordinating discovery and deposition errata (3.2).
669	2/19/2016	Eccles, Lindsey Godfrey	Partner	LI10	1.3	550	$715.00	Attending to class representative issues.
670	2/19/2016	Hoek, Kathryn P.	Partner	LI11	0.6	600	$360.00	Reviewing case materials and reviewing and responding to emails.
671	2/19/2016	Pachman, Krysta K.	Associate	LI04	14.1	375	$5,287.50	Attending Gail Murphy deposition (7.0). Traveling to LA from Gail Murphy deposition (7.1).
672	2/19/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re G. Murphy deposition.
673	2/19/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling entire production file of C. Hunt for attorney review (.3). Uploading results to trail team re same (.1).
674	2/20/2016	Eccles, Lindsey Godfrey	Partner	LI10	0.3	550	$165.00	Attending to class representative issues.
675	2/20/2016	Pachman, Krysta K.	Associate	LI05	8.1	375	$3,037.50	Traveling to Lincoln, Nebraska for Cindy Booze deposition (7.0). Preparing for Cindy Booze deposition (1.1).
676	2/21/2016	Pachman, Krysta K.	Associate	LI05	6	375	$2,250.00	Attending C. Booze deposition prep. (4.5). Preparing chart re discovery (1.0). Preparing response to Michael Hamburger (.5).
677	2/22/2016	Pachman, Krysta K.	Associate	LI05	17.4	375	$6,525.00	Attending C. Booze deposition (8.0). Traveling to Los Angeles from Booze deposition (9.4).
678	2/22/2016	Eccles, Lindsey Godfrey	Partner	LI11	2.5	550	$1,375.00	Attending to discovery dispute, privilege logs, and class representative issues.
679	2/22/2016	Hoek, Kathryn P.	Partner	LI05	2.6	600	$1,560.00	Preparing for depositions of class representatives (2.0). Reviewing case materials and correspondence (.6).
680	2/22/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling all un-redacted versions of document productions related to C. Hunt for attorney review.
681	2/23/2016	Lee, Vanessa	IT Assistant	LI07	0.5	125	$62.50	Creating load files, tiffs, and associated text files for a set of PDF files.
682	2/23/2016	Eccles, Lindsey Godfrey	Partner	LI07	0.2	350	$70.00	Conferring with C. Surujbhan re privilege log (.1). Working on redaction project (.1).
683	2/23/2016	Hoek, Kathryn P.	Partner	LI09	2.3	600	$1,380.00	Reviewing documents and discovery responses to prepare for depositions of class representatives Bugge (2.0). Reviewing and responding to emails and correspondence (.3).
684	2/23/2016	Pachman, Krysta K.	Associate	LI05	7.2	375	$2,700.00	Preparing for McGuinness deposition prep. (2.5). Attending McGuinness prep (4.0). Emailing re discovery (.5). Amending McGuinness discovery responses (.2).
685	2/23/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to McGuiness identified for production (.3). Uploading of production results for service re same (.1).
686	2/24/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing correspondence and case materials.
687	2/24/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re Batey and Palo Alto depositions.
688	2/24/2016	Pachman, Krysta K.	Associate	LI05	12.4	375	$4,650.00	Preparing for McGuinness deposition (2.5). Attending McGuinness deposition (8.0). Coordinating discovery (1.2). Preparing McGuinness deposition summary (.7).
689	2/24/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Creating new document upload and link for document production related to McGuiness (.2). Updating trial team re same (.1).
690	2/25/2016	Eccles, Lindsey Godfrey	Partner	LI10	1.6	550	$880.00	Attending to class representative issues.
691	2/25/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re deposition instructions and issues re questions related to arrest records, retainer agreements, and prior litigation (1.0). Conferring re discovery disputes based on meta-data and settlement agreements (.5).

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692	2/25/2016	Hoek, Kathryn P.	Partner	LI09	0.9	600	$540.00	Reviewing correspondence and case materials (.7). Coordinating with counsel for class representative Bugge regarding deposition (.2).
693	2/25/2016	Pachman, Krysta K.	Associate	LI05	16.4	375	$6,150.00	Traveling to Reymann prep. (10.0). Preparing for Reymann deposition (3.0). Coordinating discovery (3.4).
694	2/25/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Reviewing defendants correspondence related to production deficiencies in preparation of converting production files for compliance.
695	2/25/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Creating new document upload and link for document production related to Murphy (.3). Updating trial team re same (.1).
696	2/25/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Creating new document upload and link for document production related to Reymann (.3). Updating trial team re same (.1).
697	2/26/2016	Hoek, Kathryn P.	Partner	LI09	1.8	600	$1,080.00	Reviewing discovery materials and documents for Bugge in preparation for deposition (1.5). Reviewing and responding to emails regarding discovery disputes and depositions (.3).
698	2/26/2016	Pachman, Krysta K.	Associate	LI05	13.1	375	$4,912.50	Attending Reymann deposition (10.0). Coordinating discovery (3.1).
699	2/27/2016	Pachman, Krysta K.	Associate	LI14	1.4	375	$525.00	Coordinating discovery (.7). Preparing charts for 3/1 hearing re motion for leave to amend (.7).
700	2/28/2016	Pachman, Krysta K.	Associate	LI04	6.6	375	$2,475.00	Traveling from Salt Lake City to Chicago for Kopp/Pankow depositions.
701	2/29/2016	Pachman, Krysta K.	Associate	LI04	10.4	375	$3,900.00	Attending Kopp depo prep (6.0). Participating in telephone call re discovery issues for 3/1 hearing (1.0). Emailing re 3/1 hearing (1.0). Contacting referring counsel re class rep supplemental interrogatory responses (1.0). Preparing response to T. Bohnett re McGuinness deposition (1.4).
702	2/29/2016	Hoek, Kathryn P.	Partner	LI05	2.4	600	$1,440.00	Preparing for deposition of class representatives Bugge (1.8). Reviewing and responding to emails and case correspondence (.3). Coordinating supplemental discovery among counsel for class representatives (.3).
703	2/29/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Updating production log with information extracted from document productions.
704	2/29/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to Reymann identified for production (.3). Uploading of production results for service re same (.1).
705	2/29/2016	Eccles, Lindsey Godfrey	Partner	LI07	1.7	350	$595.00	Attending to redaction project (1.0). Attending to class representative depositions (.7).
706	2/29/2016	Surujbhan, Camille	Paralegal	LI07	3	90	$270.00	Compiling and updating privilege log for IPPs and redacting documents to file per instruction from L. Eccles and K. Pachman.
707	2/29/2016	Surujbhan, Camille	Paralegal	LI07	2	90	$180.00	Updating final edits to privilege log for IPPs and document redaction.
708	3/1/2016	Eccles, Lindsey Godfrey	Partner	LI07	1	350	$350.00	Attending to redaction project.
709	3/1/2016	Eccles, Lindsey Godfrey	Partner	LI10	0.3	550	$165.00	Addressing class representative issues.
710	3/1/2016	Pachman, Krysta K.	Associate	LI04	9.4	375	$3,525.00	Attending J. Kopp deposition (7.5). Summarizing J. Kopp deposition (1.0). Coordinating discovery (.9).
711	3/1/2016	Hoek, Kathryn P.	Partner	LI09	0.9	600	$540.00	Following up with class representatives and referring counsel regarding supplemental discovery issues per agreements with opposing counsel.
712	3/1/2016	Hoek, Kathryn P.	Partner	LI06	3.6	600	$2,160.00	Preparing for and attending meeting with class representative S. Bugge and referring counsel to prepare for deposition of S. Bugge.
713	3/1/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Corresponding with third party vendor re load file requirements per standing order and deficiency letter (.2). Update trial team of results re same (.1).
714	3/2/2016	Eccles, Lindsey Godfrey	Partner	LI10	0.8	550	$440.00	Addressing class representative issues.
715	3/2/2016	Pachman, Krysta K.	Associate	LI11	6.5	375	$2,437.50	Attending J. Pankow deposition preparation (6.0) Emailing re discovery coordination (.5).
716	3/2/2016	Hoek, Kathryn P.	Partner	LI06	4.5	600	$2,700.00	Preparing for and attending meeting with class representative S. Bugge and referring counsel to prepare for deposition of S. Bugge.
717	3/2/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing emails and case materials re class member depositions of Bugge and Pham.
718	3/2/2016	Hoek, Kathryn P.	Partner	LI06	0.4	600	$240.00	Following up with class representatives and referring counsel on issues raised in discovery meet and confers with opposing counsel.
719	3/2/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Meeting with third party vendor regarding standing order for production requirements of class representatives (.3). Updating trial team of results re same (.1).
720	3/2/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Preparing documents related to class representative Bugge for load file and service (.3). Updating trial team of results for service re same (.1).
721	3/3/2016	Surujbhan, Camille	Paralegal	LI07	0.5	90	$45.00	Editing privilege log and sending final redacted documents to K. Mata for metadata load files.
722	3/3/2016	Eccles, Lindsey Godfrey	Partner	LI07	1	350	$350.00	Working on redaction project.
723	3/3/2016	Eccles, Lindsey Godfrey	Partner	LI05	5.5	550	$3,025.00	Attending S. Bugge deposition (5.0). Corresponding re Bugge deposition (.5)

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724	3/3/2016	Pachman, Krysta K.	Associate	LI11	2.4	375	$900.00	Emailing re discovery coordination (1.0). Preparing correspondence to opposing counsel (1.4).
725	3/3/2016	Mata, Kenneth	Paralegal	LI07	2.6	225	$585.00	Preparing redacted documents and all previously produced documents consisting of parts 1-3 for creation of load files and process of service (2.4). Uploading completed load files for service re same (.2).
726	3/4/2016	Pachman, Krysta K.	Associate	LI04	10.8	375	$4,050.00	Attending J. Pankow deposition (8.0). Summarizing J. Pankow deposition (1.0). Reviewing and revising correspondence re discovery (1.0). Participating in call with R. Green and S. Harmon re discovery (.8).
727	3/4/2016	Hoek, Kathryn P.	Partner	LI05	0.8	600	$480.00	Coordinating with referring counsel regarding deposition of T. Pham (.4). Reviewing materials provided by co-leads for T. Pham (.4).
728	3/4/2016	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Preparing documents related to class representative Harmon for load file and service (.4). Updating trial team of results for service re same (.1).
729	3/5/2016	Pachman, Krysta K.	Associate	LI02	8.7	375	$3,262.50	Coordinating discovery (3.0). Traveling from Chicago to LA (5.7).
730	3/6/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.2	550	$110.00	Drafting summary of S. Bugge deposition.
731	3/6/2016	Eccles, Lindsey Godfrey	Partner	LI10	0.2	550	$110.00	Conferring via email re class representative issues.
732	3/7/2016	Pachman, Krysta K.	Associate	LI04	10.5	375	$3,937.50	Traveling to Portland, Oregon for S. Harmon deposition (7.5). Corresponding re discovery (1.0). Preparing supplemental interrogatory responses (2.0).
733	3/7/2016	Hoek, Kathryn P.	Partner	LI05	1.6	600	$960.00	Preparing for T. Pham deposition.
734	3/7/2016	Hoek, Kathryn P.	Partner	LI09	1.4	600	$840.00	Reviewing case materials, correspondence, and transcripts of recent depositions to prepare for Pham deposition.
735	3/7/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.4	550	$220.00	Attending to class representative issues.
736	3/7/2016	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Compiling multiple documents related to class representatives identified for use in upcoming document production.
737	3/8/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.4	550	$220.00	Attending to class representative issues.
738	3/8/2016	Hoek, Kathryn P.	Partner	LI05	4.3	600	$2,580.00	Attending meeting to prepare for deposition of T. Pham (3.0). Addressing discovery issues relating to upcoming and past depositions (.7). Reviewing case materials and correspondence to prepare for Pham deposition (.6).
739	3/8/2016	Pachman, Krysta K.	Associate	LI05	10.4	375	$3,900.00	Attending Sheri Harmon deposition prep. (6.0). Coordinating discovery (4.0). Participating in call with Joe Mann re J. Ames interrogatory responses and errata (.4).
740	3/8/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to class representative Ames identified for use in upcoming document production (.3). Uploading completed load files for service re same (.1).
741	3/8/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Compiling and preparing documents related to class representative Bessette identified for use in upcoming document production (.3). Uploading completed load files for service re same (.1).
742	3/8/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Compiling and preparing documents related to class representative Murphy identified for use in upcoming document production (.2). Uploading completed load files for service re same (.1).
743	3/8/2016	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Compiling and preparing documents related to class representative Pham identified for use in upcoming document production (.4). Uploading completed load files for service re same (.1).
744	3/9/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.2	550	$660.00	Attending to class representative issues.
745	3/9/2016	Hoek, Kathryn P.	Partner	LI09	1.2	600	$720.00	Reviewing case materials and correspondence to prepare for Pham deposition (.7). Following up on outstanding discovery issues re Pham and Bugge (.5).
746	3/9/2016	Pachman, Krysta K.	Associate	LI04	15.5	375	$5,812.50	Attending Sheri Harmon deposition (8.0). Participating in telephone call with D. Lambrinos re 3/10 hearing (1.0). Participating in call with C. Hunt re interrogatory responses (1.0). Coordinating discovery (5.5).
747	3/9/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Compiling and preparing documents identified for use in upcoming deposition of T. Pham (.6). Uploading results to trial team re same (.1).
748	3/10/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.9	550	$1,045.00	Attending to class representative issues (1.5). Conferring with counsel for D. Shawn (.4).
749	3/10/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Conferring with counsel for T. Pham (.3). Conferring with opposing counsel regarding deposition of T. Pham (.1). Reviewing and responding to emails regarding discovery issues (.2).
750	3/10/2016	Pachman, Krysta K.	Associate	LI09	15.1	375	$5,662.50	Traveling to Reno, Nevada for Ence deposition (4.0). Participating in Ence prep (6.0). Participating in call with D. Lambrinos re Request for Production and search terms (.5) Coordinating discovery (4.6).

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751	3/10/2016	Sklaver, Steven G.	Partner	LI11	2	700	$1,400.00	Conferring re Bugge deposition summary and issues, Hathaway responses and objections, and results from hearing of Ryu and adjustments to production required going forward.
752	3/11/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.3	550	$715.00	Attending to class representative issues.
753	3/11/2016	Hoek, Kathryn P.	Partner	LI09	1.1	600	$660.00	Following up on discovery issues with class representatives and referring counsel (.4) Reviewing summary of hearing and related emails (.4). Conferring with T. Pham and M. Reich regarding amended and supplemental discovery responses (.3).
754	3/11/2016	Pachman, Krysta K.	Associate	LI05	16.1	375	$6,037.50	Coordinating discovery (4.1). Attending Ence deposition (8.0). Traveling to Los Angeles, California from Ence deposition (4.0).
755	3/11/2016	Sklaver, Steven G.	Partner	LI11	0.8	700	$560.00	Conferring re alleged metadata deficiencies raised by defendant.
756	3/12/2016	Pachman, Krysta K.	Associate	LI05	2.6	375	$975.00	Preparing for Hathaway deposition prep (1.5). Coordinating discovery (1.1).
757	3/13/2016	Pachman, Krysta K.	Associate	LI03	12.4	375	$4,650.00	Coordinating discovery verifications/responses (2.5). Preparing chart re Apple specifications (1.0). Traveling to Washington, D.C. for Hathaway & Associates deposition (8.9).
758	3/14/2016	Pachman, Krysta K.	Associate	LI05	8.5	375	$3,187.50	Attending Hathaway & Associates deposition prep. (5.0). Coordinating discovery verifications/responses (3.5).
759	3/14/2016	Eccles, Lindsey Godfrey	Partner	LI03	5	550	$2,750.00	Drafting response to Hathaway deposition notice (.5). Revising McGranahan supplemental interrogatory response (.5). Attending to other class representative issues (4.0).
760	3/14/2016	Hoek, Kathryn P.	Partner	LI05	1.4	600	$840.00	Preparing for deposition of T. Pham (1.0). Reviewing correspondence and case materials re Pham deposition(.4).
761	3/14/2016	Mata, Kenneth	Paralegal	LI07	1	225	$225.00	Compiling and preparing deposition summaries of all deponents to date in support of response to discovery request (.8). Uploading results to trial team re same (.2).
762	3/14/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re metadata production discovery dispute from class representatives and electronically stored information protocol and deposition summary collection for lead counsel per its request.
763	3/15/2016	Eccles, Lindsey Godfrey	Partner	LI05	8.3	550	$4,565.00	Attending class representative, D. Shawn deposition (7.0). Attending to class representative issues (1.3).
764	3/15/2016	Pachman, Krysta K.	Associate	LI03	6.7	375	$2,512.50	Coordinating discovery responses (5.0). Reviewing and revising 4CAC (1.7).
765	3/15/2016	Hoek, Kathryn P.	Partner	LI05	7	600	$4,200.00	Preparing for deposition of T. Pham (5.0). Traveling to and from deposition of T. Pham (2.0).
766	3/15/2016	Mata, Kenneth	Paralegal	LI07	0.6	225	$135.00	Attending conference call re metadata issues and resolutions re document productions.
767	3/15/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Compiling and preparing additional deposition summaries of all deponents to date in support of response to discovery request (.6). Uploading results to trial team re same (.1).
768	3/15/2016	Mata, Kenneth	Paralegal	LI07	2.7	225	$607.50	Creating spreadsheet for all document productions and searching case entire case management files for native documents and correspondence in preparation of reproduction of all previously produced documents.
769	3/15/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re meet and confer efforts by M. Hamburger and discovery dispute re same.
770	3/16/2016	Eccles, Lindsey Godfrey	Partner	LI11	3.1	550	$1,705.00	Attending to class representative issues (2.5). Reviewing order (.6).
771	3/16/2016	Pachman, Krysta K.	Associate	LI09	12.9	375	$4,837.50	Traveling home from Washington, D.C. Coordinating discovery (11.5). Reviewing and revising 4CAC (1.4).
772	3/16/2016	Hoek, Kathryn P.	Partner	LI05	7.3	600	$4,380.00	Attending deposition of T. Pham (6.5). Addressing discovery issues raised in deposition of T. Pham (.6). Reviewing correspondence re Pham deposition (.2).
773	3/16/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re deposition preparation of class representatives and going forward schedule.
774	3/17/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.5	550	$275.00	Attending to class representative issues.
775	3/17/2016	Pachman, Krysta K.	Associate	LI09	1.6	375	$600.00	Coordinating discovery (1.1). Reviewing 4CAC (.5).
776	3/17/2016	Hoek, Kathryn P.	Partner	LI09	1.2	600	$720.00	Reviewing transcript of T. Pham and preparing summary (1.0). Reviewing correspondence and case materials (.2).
777	3/17/2016	Mata, Kenneth	Paralegal	LI07	3.2	225	$720.00	Continuing creating spreadsheet of all document productions and searching case entire case management files for native documents and correspondence in preparation of reproduction of all previously produced documents.
778	3/17/2016	Mata, Kenneth	Paralegal	LI07	2.1	225	$472.50	Continuing creating spreadsheet of all document productions and searching case entire case management files for native documents and correspondence in preparation of reproduction of all previously produced documents.
779	3/17/2016	Sklaver, Steven G.	Partner	LI11	1.5	700	$1,050.00	Conferring re REDACTED
780	3/18/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.4	550	$220.00	Attending to class representative issues.
781	3/18/2016	Pachman, Krysta K.	Associate	LI09	4.2	375	$1,575.00	Coordinating discovery (3.5). Reviewing 4CAC (.7).
782	3/18/2016	Pachman, Krysta K.	Associate	LI09	0.3	375	$112.50	Logging documents on written chronology.

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783	3/18/2016	Sklaver, Steven G.	Partner	LI11	0.8	700	$560.00	Conferring re amended complaint, depositions, and dropping class representatives.
784	3/21/2016	Pachman, Krysta K.	Associate	LI05	4.7	375	$1,762.50	Coordinating discovery (3.0). Preparing for Billingsley deposition prep (1.7).
785	3/21/2016	Pachman, Krysta K.	Associate	LI09	1.9	375	$712.50	Logging documents on written chronology.
786	3/21/2016	Eccles, Lindsey Godfrey	Partner	LI03	0.3	550	$165.00	Attending to discovery requests.
787	3/21/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.3	550	$165.00	Attending to class representative deposition scheduling.
788	3/21/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Corresponding with third party vendor and co-counsel re deposition transcript of D. Reymann (.2). Updating trial team of results re same (.1).
789	3/21/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Preparing deposition transcript of D. Reymann for review and errata completion (.3). Updating transcript to trial team re same (.1).
790	3/22/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.6	550	$330.00	Attending to class representative issues.
791	3/22/2016	Hoek, Kathryn P.	Partner	LI06	0.9	600	$540.00	Reviewing correspondence re Billinsley deposition (.5). Discussing discovery strategy with co-counsel (.4).
792	3/22/2016	Pachman, Krysta K.	Associate	LI05	12.6	375	$4,725.00	Coordinating discovery (2.0). Traveling to Memphis, Tennessee for Billingsley preparation (10.6).
793	3/23/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.5	550	$825.00	Attending to class representative issues.
794	3/23/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing and responding to emails and correspondence re amending class representative discovery responses.
795	3/23/2016	Pachman, Krysta K.	Associate	LI05	18.7	375	$7,012.50	Traveling from Memphis, TN to Booneville, MS for Billingsley prep. (4.0). Attending Billingsley prep. (4.0). Traveling from Booneville, MS to Los Angeles (10.0). Coordinating discovery (.7)
796	3/24/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.2	550	$110.00	Attending to class representative issues.
797	3/24/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing and responding to emails and correspondence re amending class representative discovery responses.
798	3/24/2016	Pachman, Krysta K.	Associate	LI06	9.3	375	$3,487.50	Attending calls re discovery (2.0). Reviewing and revising supplemental interrogatory responses (1.0). Preparing for Fennelly deposition (4.0). Attending telephone call with Mr. Fennelly re document collection (1.0). Reviewing deposition transcripts for erratas (1.3).
799	3/24/2016	Mata, Kenneth	Paralegal	LI07	0.5	225	$112.50	Reviewing native document spreadsheet received from co-counsel legal assistant and assist with identification of native documents for upcoming document reproduction.
800	3/24/2016	Mata, Kenneth	Paralegal	LI07	0.6	225	$135.00	Reviewing deposition errata of multiple individuals and creating files in preparation of service on court reporting service (.4). Serving documents re same (.2).
801	3/24/2016	Mata, Kenneth	Paralegal	LI07	0.3	225	$67.50	Updating deposition roster with information extracted from deposition transcripts.
802	3/25/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.8	550	$440.00	Attending to class representative issues.
803	3/25/2016	Pachman, Krysta K.	Associate	LI09	4	375	$1,500.00	Reviewing deposition transcripts for errata (3.5). Preparing supplemental interrogatory responses for service (.5).
804	3/28/2016	Pachman, Krysta K.	Associate	LI06	12.1	375	$4,537.50	Attending call re Billingsley document collection (1.0). Coordinating discovery (11.1).
805	3/28/2016	Mata, Kenneth	Paralegal	LI07	1.2	225	$270.00	Creating class representative files with related documents and all document productions in support of upcoming native file reproduction (.8). Uploading to external database re same (.4).
806	3/28/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.3	550	$165.00	Attending to class representative issues.
807	3/28/2016	Eccles, Lindsey Godfrey	Partner	LI07	0.4	350	$140.00	Conferring with D. Lambrinos re privilege log.
808	3/28/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing and responding to emails and correspondence re Billinsley deposition.
809	3/29/2016	Mata, Kenneth	Paralegal	LI07	0.4	225	$90.00	Serving deposition errata of Booze and Bessette (.3). Updating production roster re same (.1).
810	3/29/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Creating deposition and errata files with related documents for co-counsel records (.5). Uploading to external database re same (.2).
811	3/29/2016	Mata, Kenneth	Paralegal	LI07	0.2	225	$45.00	Corresponding with court reporting vendor re deposition transcripts for Bugge and Shawn (.1). Updating trial team of results re same (.1).
812	3/29/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.3	550	$165.00	Attending to class representative issues.
813	3/29/2016	Eccles, Lindsey Godfrey	Partner	LI07	2	350	$700.00	Conferring with C. Surujbhan re privilege log (.5). Drafting letter to opposing counsel re same (1.5).
814	3/29/2016	Pachman, Krysta K.	Associate	LI05	10.8	375	$4,050.00	Attending call re Fennelly document collection (1.0). Emailing re discovery (1.0). Attending Billingsley deposition preparation (6.8). Reviewing Reymann transcript (2.0).
815	3/29/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing case material and correspondence re Batey deposition and discovery responses.
816	3/30/2016	Pachman, Krysta K.	Associate	LI04	13.2	375	$4,950.00	Attending Billingsley deposition (8.0). Emailing re discovery (1.0). Traveling from Billingsley deposition to Nashville for Batey deposition (4.2).

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2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
817	3/31/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.6	550	$330.00	Attending to class representative issues.
818	3/31/2016	Pachman, Krysta K.	Associate	LI03	15.2	375	$5,700.00	Attending Caleb Batey deposition prep. (5.0). Traveling to Los Angeles from Nashville (8.0). Preparing supplemental interrogatory responses for service and emailing re discovery (2.2).
819	3/31/2016	Pachman, Krysta K.	Associate	LI07	1.2	350	$420.00	Logging documents in written chron.
820	3/31/2016	Hoek, Kathryn P.	Partner	LI09	0.3	600	$180.00	Reviewing case materials and correspondence re Reymann deposition and discovery responses.
821	4/1/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing case materials and correspondence in preparation for Fennelly deposition.
822	4/1/2016	Eccles, Lindsey Godfrey	Partner	LI11	1	550	$550.00	Attending to class representative issues (.3). Reviewing order (.2).
823	4/2/2016	Pachman, Krysta K.	Associate	LI06	1.3	375	$487.50	Emailing re discovery.
824	4/3/2016	Pachman, Krysta K.	Associate	LI05	13.1	375	$4,912.50	Traveling to Lawrence, Kansas for D. Fennelly deposition preparation (7.6). Attending D. Fennelly deposition preparation (5.5).
825	4/4/2016	Pachman, Krysta K.	Associate	LI05	13.1	375	$4,912.50	Emailing re discovery (2.0). Traveling from Lawrence, Kansas to Los Angeles from D. Fennelly deposition preparation (11.1)
826	4/4/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing case materials and correspondence in preparation for Beson deposition.
827	4/4/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.5	550	$275.00	Attending to class representative issues.
828	4/4/2016	DeGeorges, Simon	Paralegal	LI01	0.2	270	$54.00	Searching court and internet records REDACTED
829	4/4/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Updating electronic database folders with emails, correspondence and documents received from trial team and respondents.
830	4/5/2016	Pachman, Krysta K.	Associate	LI06	0.1	375	$37.50	Emailing re discovery.
831	4/6/2016	Pachman, Krysta K.	Associate	LI05	18.6	375	$6,975.00	Traveling to Nashville, Tennessee for Batey deposition (10.0). Participating in Batey preparation (5.0). Coordinating discovery (3.6).
832	4/6/2016	DeGeorges, Simon	Paralegal	LI07	0.3	270	$81.00	Drafting and sending email to TSG court reporting service to request deposition transcripts of Donna Shawn and Steve Bugge in accordance with K. Pachman's request.
833	4/7/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing case materials and correspondence in preparation for Batey deposition.
834	4/7/2016	Pachman, Krysta K.	Associate	LI04	10.5	375	$3,937.50	Traveling to/from Caleb Batey deposition (2.0). Attending Caleb Batey deposition (7.5). Preparing Batey deposition summary (.5). Emailing re discovery (.5).
835	4/8/2016	Pachman, Krysta K.	Associate	LI05	12.7	375	$4,762.50	Traveling to Naples, Florida for David Beson deposition preparation (8.0). Preparing supplemental interrogatory responses (.7). Attending David Beson deposition preparation (4.0).
836	4/8/2016	Eccles, Lindsey Godfrey	Partner	LI07	3	350	$1,050.00	Conferring and supervising E. Ehrenfeld re privilege log project.
837	4/8/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.5	550	$275.00	Attending to class representative issues.
838	4/9/2016	Pachman, Krysta K.	Associate	LI05	7.8	375	$2,925.00	Traveling from Naples, Florida to Kansas City for Fennelly deposition (7.5). Emailing re deposition preparation (.3).
839	4/10/2016	Pachman, Krysta K.	Associate	LI05	0.3	375	$112.50	Emailing re deposition preparation.
840	4/11/2016	Pachman, Krysta K.	Associate	LI05	13.6	375	$5,100.00	Driving to Lawrence, Kansas for Fennelly deposition (2.0). Attending deposition preparation with Fennelly (3.0). Attending Fennelly deposition (7.0). Emailing re discovery (1.0). Preparing supplemental interrogatory responses (.6).
841	4/11/2016	Eccles, Lindsey Godfrey	Partner	LI07	3	350	$1,050.00	Attending to privilege log and document production.
842	4/11/2016	Hoek, Kathryn P.	Partner	LI07	4.6	350	$1,610.00	Reviewing case materials and correspondence (1.0). Reviewing deposition summaries (1.0). Reviewing documents for relevance and production (2.6).
843	4/11/2016	Sklaver, Steven G.	Partner	LI11	1	700	$700.00	Conferring re Beason document review for deposition.
844	4/11/2016	Mata, Kenneth	Paralegal	LI07	0.7	225	$157.50	Compiling all document productions identified for additional review of un-redacted versions of documents.
845	4/12/2016	DeGeorges, Simon	Paralegal	LI07	5.2	270	$1,404.00	Reviewing documents on Relativity database for any materials relating to or confirming Dave Beson's purchase of a Samsung laptop, model QX410, in October 2010, and emailing search results to K. Pachman in accordance with her request.
846	4/12/2016	Eccles, Lindsey Godfrey	Partner	LI07	0.2	350	$70.00	Attending to privilege log and document production.
847	4/12/2016	Pachman, Krysta K.	Associate	LI03	17.1	375	$6,412.50	Reviewing D. Beson documents for production (1.5). Traveling to D. Beson deposition (8.0). Preparing for D. Beson deposition (5.0). Emailing re discovery (2.0). Preparing supplemental interrogatory responses (.6).
848	4/12/2016	Hoek, Kathryn P.	Partner	LI07	4.5	350	$1,575.00	Reviewing Beson documents for relevance and production (3.7). Reviewing and responding to emails re document review protocol (.8).
849	4/12/2016	Wilson, Daniel	Staff Atty	LI07	6.8	275	$1,870.00	Reviewing plaintiff's emails for responsive emails (5.8). Conferring by email with trial team (1.0).

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2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
850	4/13/2016	Eccles, Lindsey Godfrey	Partner	LI07	0.5	350	$175.00	Attending to privilege log and document production.
851	4/13/2016	Hoek, Kathryn P.	Partner	LI09	0.3	600	$180.00	Reviewing emails and case materials re Bryant deposition.
852	4/13/2016	Pachman, Krysta K.	Associate	LI05	17.4	375	$6,525.00	Attending D. Beson deposition preparation and deposition (12.0). Traveling from Naples, Florida to Rochester, New York for M. Bryant preparation (5.4).
853	4/13/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re document review.
854	4/14/2016	Eccles, Lindsey Godfrey	Partner	LI07	1	350	$350.00	Conferring via email re document production and privilege log.
855	4/14/2016	Hoek, Kathryn P.	Partner	LI07	2.4	350	$840.00	Reviewing additional Beson documents for responsiveness and production (2.0). Reviewing and responding to emails re upcoming depositions (.4).
856	4/14/2016	Pachman, Krysta K.	Associate	LI05	16.7	375	$6,262.50	Reviewing M. Bryant documents (1.5). Attending M. Bryant deposition preparation (5.0). Traveling from Rochester, New York to Kansas City, Missouri (7.5). Reviewing class rep documents (1.5). Preparing Rojanasathit interrogatory responses (1.2).
857	4/14/2016	DeGeorges, Simon	Paralegal	LI07	4.9	270	$1,323.00	Reviewing documents on Relativity database for any materials relating to or confirming Christopher Hunt's purchase of a Sony laptop in 2003 and Compaq laptops in 2006 and 2010, Bradley Seldin's purchase of an Acer Aspire laptop in 2008, and John Kopp's purchase of a Dell laptop in 2005 and emailing search results to K. Pachman in accordance with her request.
858	4/15/2016	Eccles, Lindsey Godfrey	Partner	LI07	0.4	350	$140.00	Conferring via email re document production and privilege log.
859	4/15/2016	Hoek, Kathryn P.	Partner	LI07	1.3	350	$455.00	Reviewing Bryant documents for responsiveness and production (1.0). Reviewing and responding to emails re document review (.3).
860	4/15/2016	Pachman, Krysta K.	Associate	LI04	6.8	375	$2,550.00	Attending J. O'Daniel deposition preparation (5.0). Reviewing documents for supplemental production and emails re same (1.8).
861	4/15/2016	DeGeorges, Simon	Paralegal	LI07	0.3	270	$81.00	Reviewing errata sheets of Maury Billingsley and Joseph Pankow and emailing same to production department at TSG Reporting in accordance with K. Pachman's request.
862	4/15/2016	DeGeorges, Simon	Paralegal	LI07	3.3	270	$891.00	Reviewing and updating production log in accordance with K. Pachman's request
863	4/16/2016	Pachman, Krysta K.	Associate	LI04	4.8	375	$1,800.00	Traveling from Kansas City to Los Angeles after J. O'Daniel deposition preparation (4.5). Emailing re discovery (.3).
864	4/17/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.2	550	$110.00	Conferring via email re class representative issues.
865	4/17/2016	Pachman, Krysta K.	Associate	LI02	0.2	375	$75.00	Emailing re discovery.
866	4/18/2016	Pachman, Krysta K.	Associate	LI02	7.3	375	$2,737.50	Finalizing requests for production for service (.8). Reviewing and revising privilege log (4.5). Preparing M. Bryant documents for service (.5). Reviewing class representative supplemental productions (1.5).
867	4/18/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing emails and case materials/correspondence re McGuinness discovery.
868	4/18/2016	DeGeorges, Simon	Paralegal	LI07	3.9	270	$1,053.00	Reviewing all production letters and updating production log to reflect ranges referenced in letters and document types in accordance with K. Pachman's request.
869	4/19/2016	Pachman, Krysta K.	Associate	LI11	12.7	375	$4,762.50	Emailing re M. Bryant battery (.5). Emailing re P. McGuinness discovery call (.5). Coordinating discovery (11.7)
870	4/20/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.1	550	$55.00	Reviewing emails re class representative issues.
871	4/20/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing emails and case materials/correspondence re verifying battery and purchases of class members.
872	4/20/2016	Pachman, Krysta K.	Associate	LI05	16.7	375	$6,262.50	Preparing for M. Bryant deposition (3.0). Attending M. Bryant deposition (8.0). Coordinating discovery (3.0). Reviewing documents for responsiveness (2.7).
873	4/20/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re depositions and alleged adequacy issues.
874	4/21/2016	Eccles, Lindsey Godfrey	Partner	LI11	1.5	550	$825.00	Reviewing emails re class representative issues.
875	4/21/2016	Pachman, Krysta K.	Associate	LI02	4.4	375	$1,650.00	Finalizing M. Bryant supplemental interrogatories (.7). Finalizing C. Batey errata (.7). Reviewing documents for privacy redactions (3.0).
876	4/22/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing emails and case materials/correspondence re verfiying battery and purchases of class members.
877	4/25/2016	Pachman, Krysta K.	Associate	LI03	13.9	375	$5,212.50	Traveling from New York to Los Angeles (9.0). Preparing interrogatory responses for service (1.5). Reviewing and revising privilege log (3.4).
878	4/25/2016	DeGeorges, Simon	Paralegal	LI07	0.2	270	$54.00	Reviewing signed errata sheets of Brian Batey and Steven Bugge and emailing same to TSG Reporting in accordance with K. Pachman's request.
879	4/25/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing emails and case materials re O'Daniel purchases.
880	4/26/2016	Hoek, Kathryn P.	Partner	LI09	0.3	600	$180.00	Reviewing emails and deposition summaries.
881	4/26/2016	Pachman, Krysta K.	Associate	LI04	5.8	375	$2,175.00	Traveling from Los Angeles to Kansas City for O'Daniel deposition.
882	4/27/2016	Pachman, Krysta K.	Associate	LI04	6.3	375	$2,362.50	Attending O'Daniel deposition.

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883	4/28/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.2	550	$110.00	Attending to class representative issues.
884	4/28/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing emails, case materials and deposition summaries.
885	4/28/2016	Pachman, Krysta K.	Associate	LI04	6.9	375	$2,587.50	Traveling from Kansas City to Los Angeles from O'Daniel deposition (5.5). Summarizing O'Daniel deposition (.8). Preparing for Rojanasathit deposition prep (.6).
886	4/29/2016	Pachman, Krysta K.	Associate	LI04	13.1	375	$4,912.50	Traveling to San Francisco (5.0). Preparing for Rojanasathit deposition (8.1).
887	4/30/2016	Pachman, Krysta K.	Associate	LI11	0.2	375	$75.00	Emailing re Rojanasathit deposition.
888	5/2/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.1	550	$55.00	Conferring via email re class representative depositions.
889	5/2/2016	Pachman, Krysta K.	Associate	LI05	1.2	375	$450.00	Emailing re discovery (.7). Participating in call re P. Rojanasathit deposition (.5).
890	5/2/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing emails and deposition summaries of O'Daniel deposition.
891	5/2/2016	DeGeorges, Simon	Paralegal	LI07	0.3	270	$81.00	Reviewing and sending deposition errata sheets of D. Fennelly and T. Pham to TSG Reporting in accordance with K. Pachman's request.
892	5/3/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.2	550	$110.00	Conferring via email re class representative depositions.
893	5/3/2016	Pachman, Krysta K.	Associate	LI05	4.1	375	$1,537.50	Traveling to San Francisco for P. Rojanasathit deposition (3.0). Reviewing and revising letter to counsel for Billingsley re dismissal from case (.5). Emailing re discovery (.6).
894	5/4/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.1	550	$55.00	Conferring via email re class representative depositions.
895	5/4/2016	Pachman, Krysta K.	Associate	LI05	9.3	375	$3,487.50	Attending P. Rojanasathit deposition preparation (2.0). Attending P. Rojanasathit deposition (5.0). Traveling to Los Angeles from San Francisco (2.3).
896	5/5/2016	Eccles, Lindsey Godfrey	Partner	LI05	0.2	550	$110.00	Conferring via email re class representative depositions.
897	5/5/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing emails re class representative depositions.
898	5/5/2016	Pachman, Krysta K.	Associate	LI06	1	375	$375.00	Attending call re class representative discovery wrap-up (.2). Emailing re deposition errata (.2). Participating in call with J. Mann re deposition transcript (.2). Summarizing P. Rojanasathit deposition (.4).
899	5/9/2016	Pachman, Krysta K.	Associate	LI03	0.2	375	$75.00	Preparing supplemental interrogatory responses for Van Patten and emailing re same.
900	5/9/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing emails and updating interrogatory responses.
901	5/9/2016	Hoek, Kathryn P.	Partner	LI09	0.6	600	$360.00	Reviewing emails and preparing amended interrogatory responses for class reps.
902	5/10/2016	Eccles, Lindsey Godfrey	Partner	LI11	0.2	550	$110.00	Conferring via email re class representative issues.
903	5/11/2016	Hoek, Kathryn P.	Partner	LI09	0.3	600	$180.00	Reviewing emails and preparing amended interrogatory responses to Tolchin.
904	5/17/2016	Pachman, Krysta K.	Associate	LI09	0.5	375	$187.50	Emailing re J. Ames interrogatory responses (.2). Emailing re case update for C. Batey (.3).
905	5/18/2016	Pachman, Krysta K.	Associate	LI03	1.3	375	$487.50	Preparing amended interrogatory responses for J. Ames (.5). Preparing responses to K. Warren's letters re discovery (.8).
906	5/18/2016	Hoek, Kathryn P.	Partner	LI09	0.4	600	$240.00	Reviewing emails re Tolchin's documents.
907	5/19/2016	Pachman, Krysta K.	Associate	LI05	0.3	375	$112.50	Emailing re deposition errata.
908	5/20/2016	Pachman, Krysta K.	Associate	LI07	0.2	350	$70.00	Emailing re D. Tolchin's documents.
909	5/23/2016	DeGeorges, Simon	Paralegal	LI07	0.5	270	$135.00	Reviewing, confirming and revising deposition log sent by M. Caylao from Cotchett Pitre and emailing revised version of same to K. Pachman in accordance with her request.
910	5/23/2016	Pachman, Krysta K.	Associate	LI11	0.8	375	$300.00	Emailing re discovery.
911	5/24/2016	Pachman, Krysta K.	Associate	LI09	0.2	375	$75.00	Emailing re discovery.
912	5/24/2016	Hoek, Kathryn P.	Partner	LI09	0.5	600	$300.00	Reviewing emails and opposition to motion for class certification
913	5/27/2016	Pachman, Krysta K.	Associate	LI04	0.2	375	$75.00	Emailing class representatives re deposition errata and deposition scheduling.
914	5/31/2016	Pachman, Krysta K.	Associate	LI04	0.2	375	$75.00	Emailing class representatives re deposition errata (.1). Responding to correspondence from defendants (.1).
915	6/1/2016	DeGeorges, Simon	Paralegal	LI07	0.2	270	$54.00	Reviewing deposition errata sheet of M. Bryant and emailing same to TSG Reporting in accordance with K. Pachman's request.
916	6/1/2016	Pachman, Krysta K.	Associate	LI09	0.7	375	$262.50	Emailing re discovery.
917	6/3/2016	Pachman, Krysta K.	Associate	LI09	0.3	375	$112.50	Reviewing opposition to motion for class certification.
918	6/6/2016	Pachman, Krysta K.	Associate	LI03	0.7	375	$262.50	Preparing letter re D. Beson (.5). Serving interrogatory responses (.2).
919	6/6/2016	Sklaver, Steven G.	Partner	LI04	0.8	700	$560.00	Conferring re Beson deposition issues.
920	6/13/2016	Pachman, Krysta K.	Associate	LI04	0.9	375	$337.50	Coordinating deposition preparation.
921	6/15/2016	DeGeorges, Simon	Paralegal	LI07	1	270	$270.00	Reviewing docket to ascertain if Samsung SDI is a defendant and whether it filed a Motion to Dismiss for Lack of Personal Jurisdiction or Motion to Transfer Venue, email results, in addition to most recent complaint from March 18, 2016 to K. Srinivasan.

	B	E	F	J	K	N	O	P
1	**Matter # 013657 Lithium Batteries Antitrust Time Entries from 6/1/2013 through 2/28/2017 - Historic Rates (with Document Review Cap)**							
2	Date	TKPR Name	Title	Task	Hours	Historical Rate (w/ Doc Rev Cap)	Extended Amount (w/ Doc Rev Cap)	Narrative
922	6/15/2016	Pachman, Krysta K.	Associate	LI05	6.1	375	$2,287.50	Traveling from Nashville to Miami for B. Seldin deposition preparation (5.0). Preparing for B. Seldin deposition preparation (1.1).
923	6/16/2016	Pachman, Krysta K.	Associate	LI04	12.1	375	$4,537.50	Participating in B. Seldin deposition preparation (4.0). Traveling from Miami to Los Angeles (7.5). Preparing amended and supplemental interrogatory responses (.5). Emailing re B. Seldin preparation (.1).
924	6/17/2016	Pachman, Krysta K.	Associate	LI03	0.3	375	$112.50	Emailing re interrogatory responses (.2). Finalizing and serving supplemental interrogatory responses (.1).
925	6/27/2016	Pachman, Krysta K.	Associate	LI04	8.2	375	$3,075.00	Traveling to B. Seldin deposition and preparing while traveling.
926	6/28/2016	Sklaver, Steven G.	Partner	LI11	0.5	700	$350.00	Conferring re B. Seldin deposition and summary.
927	6/28/2016	Pachman, Krysta K.	Associate	LI05	12.6	375	$4,725.00	Preparing for B. Seldin deposition (1.0). Attending B. Seldin deposition (5.0). Traveling from Miami to Los Angeles from B. Seldin deposition (6.6)
928	6/29/2016	Pachman, Krysta K.	Associate	LI06	0.2	375	$75.00	Emailing re discovery.
929	6/30/2016	Pachman, Krysta K.	Associate	LI03	0.4	375	$150.00	Preparing and sending service email.
930	7/28/2016	Pachman, Krysta K.	Associate	LI07	0.3	350	$105.00	Revising C. Batey interrogatory responses.
931	8/9/2016	Tan, Joel	Paralegal	LI07	1.5	270	$405.00	Gathering of all deposition exhibits and preparing same for delivery to co-counsel.
932	8/11/2016	Pachman, Krysta K.	Associate	LI03	0.1	375	$37.50	Emailing re deposition errata.
933	8/12/2016	Pachman, Krysta K.	Associate	LI09	0.1	375	$37.50	Emailing re deposition exhibits.
934	8/15/2016	Pachman, Krysta K.	Associate	LI03	0.1	375	$37.50	Emailing re scheduling a call to discuss interrogatory responses.
935	8/25/2016	Pachman, Krysta K.	Associate	LI07	0.1	350	$35.00	Emailing re production log.
936	11/13/2016	Pachman, Krysta K.	Associate	LI10	0.6	375	$225.00	Emailing re class certification hearing.
937	1/6/2017	Pachman, Krysta K.	Associate	LI12	0.2	375	$75.00	Emailing re approval of settlement.
938								
939					**2,781.9**		**$1,181,409.50**	

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
SUSMAN GODFREY L.L.P.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	$310.00
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	$2,182.65
Investigation	
Lexis/Westlaw	$2,434.30
Messenger/Delivery	$3,089.82
Photocopies – In House (capped at $0.20 per copy)	$1,729.60
Photocopies – Outside	$2,330.25
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	$28.40
Travel	$52,070.82
Miscellaneous	$126,348.04
TOTAL:	$190,523.88

EXHIBIT 65

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JON A. TOSTRUD IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF TOSTRUD LAW GROUP, P.C.**

I, Jon A. Tostrud, declare:

1. I am the founding member of the law firm of Tostrud Law Group, P.C. ("TLG"), Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Laura Gallardo and as counsel for IPPs throughout the course of this litigation. The background and experience of TLG and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, TLG performed the following work: (a) communicating directly with named plaintiff Laura Gallardo and evaluating her viability as a representative plaintiff for the consolidated complaint; (b) providing information directly to and soliciting advice and input from the named plaintiff Laura Gallardo regarding important developments in the case, including indictments of the defendants; (c) at lead counsel's direction, conferring with co-counsel regarding discovery projects for named plaintiff Laura Gallardo; and (d) drafting and reviewing discovery responses, including gathering and evaluating documents, with and for named plaintiff Laura Gallardo. Additionally, TLG engaged in several internal conferences with co-counsel to ensure that these discovery projects and the evaluation of named plaintiff Laura Gallardo occurred in a seamless and efficient manner.

5. Attached hereto as **Exhibit B** is a billing summary of TLG's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by TLG

during this period of time was 4.40, with a corresponding lodestar based on current rates of $2,640.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by TLG.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses TLG has incurred during the course of this litigation. TLG expended a total of $2,593.70 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by TLG on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

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

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

Executed on May 23, 2017 at Los Angeles, California.

Jon A. Tostrud

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

TOSTRUD
LAW GROUP, PC

LOS ANGELES • MINNEAPOLIS

TOSTRUD LAW GROUP, P.C.
1925 CENTURY PARK EAST
SUITE 2125
LOS ANGELES, CA 90067
TEL: 310.278.2600
FAX: 310.278.2640
WWW.TOSTRUDLAW.COM

FIRM RESUME

Tostrud Law Group, P.C was founded in 2012 with offices in Los Angeles and Minneapolis. We have a diversified legal practice, successfully representing plaintiffs in the areas of personal injury, securities and financial fraud, employment discrimination, unlawful employment practices including wage and hour disputes, product defect, consumer protection, antitrust and intellectual property, False Claims Act, and human rights. Our clients include individuals, classes or groups of persons, businesses, and public and private entities.

FIRM BIOGRAPHY:

JON A. TOSTRUD, Admitted to practice in the State of California and the State of Minnesota; U.S. District Court, Eastern District of California, 1999; U.S. District Court, Southern District of California, 1999; U.S. District Court, Northern District of California, 1999; U.S. District Court, Central District of California, 1998; *Education:* William Mitchell College of Law (J.D., 1994); State Bar of California; State Bar of Minnesota. California Bar Association.

In addition, while with the firm of Cuneo Gilbert &. LaDuca, LLP, Mr. Tostrud headed the wage and hour practice and was appointed lead or co-lead counsel and achieved seven-figure and eight-figure settlements in several class and collective actions including:

Nerland v. Caribou Coffee. Inc. et al., Civil No. 05-1847 (United States District Court for the District of Minnesota). As co-lead class counsel, Cuneo Gilbert & LaDuca, LLP achieved a $2.7 million settlement on behalf of retail store managers improperly classified as exempt from overtime. The class action suit first filed in

2005, charged Caribou with wrongfully denying overtime pay due to current and former Caribou store managers. The lawsuit contended that Caribou misclassified its Store Manager position as exempt under the Minnesota and Federal Fair Labor Standards Acts to avoid paying overtime compensation. After nearly three years of litigation, the parties entered into a Settlement whereby, the Court granted final approval and Caribou Coffee Co. compensated participating class members.

Oliva, et al v. International Coffee and Tea. LLC d/b/a The Coffee Bean and Tea Leaf, et al., Case No. BC296435 (Superior Court of the State of California, County of Los Angeles). As co-lead class counsel, Cuneo Gilbert & LaDuca, LLP achieved a seven-figure settlement on behalf of retail store managers improperly classified as exempt from overtime, as well as hourly-paid barristas who were not compensated for their meal and rest breaks.

Lagunas v. Cargill Meat Solutions Corp., Case No. 10-cv-00220 (United State District Court for the Southern District of Iowa) (Final approval - 1/27/11 Cuneo Gilbert & LaDuca, LLP served as co-lead counsel in six-figure class settlement on behalf of meat processing plant employees who were not properly paid for donning and doffing activities performed before their shifts, during meal breaks and after their shifts.

Wineland, et al v. Casey's General Stores, Inc., No. 08 CV 00020 (United States District Court for the Southern District of Iowa) (Final approval 10/22/09). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a seven figure settlement on behalf of a Section 216(b) collective class and Rule 23 class of over 60,000 cooks and cashiers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

Cedeno et al v. Home Mortgage Desk. Corp. et al., No. 08 CV 1168 (United States District Court for the Eastern District of New York) (Final approval -

6/15/10). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a six figure settlement on behalf of a Section 216(b) collective class of loan officers deprived of overtime wages.

Jones, et al v. Casey's General Stores. Inc., No. 07 CV 400 (United States District Court for the Southern District of Iowa) (Final approval - 10/22/09). Cuneo Gilbert & LaDuca, LLP along with co-counsel was appointed lead counsel and achieved a seven figure settlement on behalf of a Section 216(b) collective class and Rule 23 class of more than 6,000 assistant store managers for unpaid wages, including time worked before and after their scheduled shifts and while off-the-clock.

ANTHONY M. CARTER, Admitted to practice in the Commonwealth of Virginia. *Education:* James E. Rogers College of Law at the University of Arizona (J.D., 1995); State Bar of Virginia; Virginia Bar association.

SETTLED CASES

a. **Struett v. Susquehanna**, No. 5:15-cv-176 (United States District Court for the Eastern District of Pennsylvania). Tostrud Law Group, P.C. helped secure a settlement on behalf of a Section 216(b) collective class and Rule 23 class of residential mortgage bankers for misclassification violations and failure to properly pay overtime wages.

b. **Pomphrett, et al. v. American Home Bank, et al.,** No. 1:12-cv-10330 (United States District Court for the District of Massachusetts). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of several hundred former loan officers for the failure to pay overtime wages.

c. **Wyler –Wittenberg, et al. v. Metlife Home Loans, Inc,** No. 2:12-cv-00366 (United States District Court for the Eastern District of New York). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of current and former loan officers for the failure to pay overtime wages.

d. **Ord, et al. v. First National Bank of Pennsylvania and F.N.B. Corp.**, No. 12-cv-00766 (United States District Court for the Western District of Pennsylvania). Tostrud Law Group, P.C. helped achieve a seven figure settlement of behalf of a Rule 23 class of several hundred account holders at First National Bank of Pennsylvania who were improperly charged overdraft fees on their checking accounts.

e. **Molyneux, et al. v. Securitas Security Services, Inc.**, No. 4:10-cv-588 (United States District Court for the Southern District of Iowa). Tostrud Law Group, P.C. helped achieve a six figure settlement of behalf of a Section 216(b) collective class and Rule 23 class of hundreds of hourly paid security officers for failure to pay for off-the-clock work.

f. **Hansen, et al v. Per Mar Security Services, et al,** No. 4:09-cv-00459 (United States District Court for the Southern District of Iowa). Tostrud Law Group, P.C. helped achieve a confidential settlement of behalf of a Section 216(b) collective class and Rule 23 class of hundreds of hourly paid security officers for back wages.

CASE PROFILES

Current Cases

a. **Elmer Ramilo v. Open Care Medical Clinic**, No. 30-2017-00901399 (Superior Court of California, County of Orange). Tostrud Law Group, P.C. serves as co-counsel in a class action lawsuit and seeks to represent thousands of consumers who allege they received unauthorized text messages from Open Care Medical Clinic in violation of the Telephone Consumer Protection Act ("TCPA"). Plaintiffs seek an injunction requiring Open Care to cease all text message advertising activities, and an award of statutory damages to all class members.

b. **Luis Bautista, et al. v. Carl Karcher Enterprises, LLC**, No. BC649777 (Superior Court of California, County of Los Angeles). Tostrud Law Group, PC. serves as co-counsel in a class action lawsuit and seeks to represent a nationwide class of employees who work for

Carl's Jr. restaurants. Plaintiffs allege that Carl's Jr.'s parent company, CKE, has colluded with its franchisees to suppress the wages of the restaurant-based managers through a "no hire" agreement that expressly forbids franchises from employing or seeking to employ any of the restaurant-based managers who work for other franchisees or for CKE directly. Plaintiffs seek class damages, restitution, and to permanently enjoin Defendants from enforcing the "no hire" term in its franchise agreement with franchisees.

c. **Grahl v. Circle K Stores, Inc.**, No. 2:14-cv-305 (United States District Court for the District of Nevada). Tostrud Law Group, P.C., serves as co-counsel for a nationwide class of Store Managers employed by defendant Circle K Stores. Plaintiffs allege Circle K Stores knowingly misclassified its Store Managers as exempt employees and failed to properly pay them the required minimum and overtime wages. On August 26, 2015, the court granted Plaintiff's motion for conditional certification and agreed the case should proceed as a national class action. To date, more than 1,200 current and former store mangers have joined the case seeking to recover back wages.

d. **Suliaman v. Southwest Furniture**, No. 2:14-cv-1854 (United States District Court for the District of Nevada). Tostrud Law Group, P.C. serves as co-counsel and seeks to represent a class of sales associates employed by Southwest Furniture Stores d/b/a Ashley Furniture Stores. Plaintiffs allege defendant Ashley Furniture knowingly misclassified its inside sales associates as exempt employees and failed to properly pay them the required overtime wages. Tostrud Law Group is seeking compensatory damages for a class of sales associates who worked in defendant's Nevada retail stores.

e. **Ardon v. City of Los Angeles,** No. BC363959 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, represents millions of Los Angeles city residents and businesses who paid taxes for telephone services that were improperly collected by the city. In October 2016, the City of Los Angeles agreed to a $92.5 million dollar settlement which would provide refunds of taxes collected for

telephone services on behalf of consumers who paid telephone utility user taxes to the City of Los Angeles for residential landline, business landline, and mobile telephone services.

f. **Rocha, et al. v. Gateway Funding,** No. 15-cv-00482 (United States District Court for the Eastern District of Pennsylvania). Tostrud Law Group, P.C. serves as co-counsel representing a nationwide class of inside sales loan officers who worked for defendant Gateway Funding. Plaintiff alleges Gateway Funding knowingly misclassified its inside loan officers as exempt employees and failed to properly pay them the required minimum and overtime wages. Plaintiff's motion to conditionally certify the class was granted on June 1, 2016, and Plaintiff's counsel is currently preparing to distribute notice to hundreds of putative class members. Tostrud Law Group is seeking compensatory damages for a nationwide class of inside sales loan officers.

g. **Lane v. First National Bank of Layton**, No. 01-15-0005-5682 (American Arbitration Association). Tostrud Law Group, P.C. serves as co-counsel seeking to represent a nationwide class of current and former inside sales loan officers for alleged violations of the Fair Labor Standards Act and Maryland state labor laws. Claimant alleges Layton knowingly misclassified its inside loan officers as exempt employees and failed to properly pay them the required minimum and overtime wages. On February 15, 2017, an arbitrator granted Claimant's Motion for Class Certification and ordered notice to be distributed to potential class members. Tostrud Law Group is seeking compensatory damages for a nationwide class of inside sales loan officers.

h. **Granados v. County of Los Angeles,** No. BC361470 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, is seeking to represent a class of residents and businesses in the County of Los Angeles who paid taxes for telephone services that were improperly collected by the county. Tostrud Law Group, P.C. is seeking refunds of taxes collected for telephone services on behalf of consumers

who paid telephone utility user taxes collected by the County of Los Angeles for residential landline, business landline, and mobile telephone services.

i. **Gonzalez-Rodriguez v. Mariana's Enterprises**, No. 2:15-cv-152 (United States District Court of the District of Nevada). Tostrud Law Group, P.C., serves as co-counsel seeking to represent a nationwide class of hourly employees of defendant Mariana's Enterprises. Plaintiffs allege defendant failed to keep accurate time records for its employees and did not compensate plaintiffs properly for overtime hours worked in violation of the Fair Labor Standards Act. Tostrud Law Group is seeking compensatory damages and an injunction against defendant for its unlawful labor practices.

j. **Granados v. Pepsico, Inc.**, No. 14-cv-01917 (United States District Court for the Central District of California). Tostrud Law Group, P.C., along with co-counsel, represent consumers who allege Pepsico deceptively omits in its advertising and marketing that its Pepsi One soft drink contains dangerous levels of the impurity 4-MEI, or 4-Methylimidazole. Tostrud Law Group seeks to represent all California consumers who purchased Pepsi One and were exposed to the substantial health ricks associated with 4-MEI.

k. **McWilliams v. City of Long Beach,** No. BC361469 (Superior Court for the County of Los Angeles). Tostrud Law Group, P.C., along with co-counsel, is seeking to represent a class of residents and businesses in the City of Long Beach who paid taxes for telephone services that were improperly collected by the city. Tostrud Law Group, P.C. is seeking refunds of taxes collected for telephone services on behalf of consumers who paid telephone utility user taxes collected by the City of Long Beach for residential landline, business landline, and mobile telephone services.

l. **Telford v. Intellectual Capital Management, Inc., et al.**, No. 14-cv-0064 (United States District Court for the Eastern District of New York). Tostrud Law Group, P.C., along with co-counsel, represents plaintiffs who received unsolicited text messages from Muscle

Maker Grill, a restaurant franchise with locations throughout the United States. Plaintiffs did not consent to receiving the text messages from Muscle Maker and were harmed as a result of defendants' actions. Tostrud Law Group seeks to represent a nationwide class of persons who received one or more unauthorized text messages from or on behalf of Muscle Maker Grill.

m. **Shadpour v. Facebook**, No. 14-cv-307 (United States District Court of the Northern District of California). Tostrud Law Group, P.C., serves as co-counsel seeking to represent a nationwide class of individuals who sent, received, or posted private Facebook messages. Plaintiffs allege Facebook reviewed or scanned users' private messages in violation of express privacy agreements. Tostrud Law Group seeks actual and statutory damages on behalf of the putative class.

n. **Small v. University Medical Center of Southern Nevada**, No. 12-cv-395 (United States District Court for the State of Nevada). Tostrud Law Group, P.C. serves as co-counsel representing employees who allege defendant University Medical Center ("UMC") failed to pay them properly for missed meal breaks under the Fair Labor Standards Act. After, the court granted Plaintiffs' motion for conditional certification on June 14, 2013, approximately 600 current and former UMC employees agreed to join the case. After a granting Plaintiffs' motion to compel in July 2013, the court appointed a Special Master to oversee the discovery process. The Special Master ultimately made numerous factual findings in support of Rule 23 class certification and concluded in a 78-page Report and Recommendation that defendant UMC had failed to identify, preserve, search for, collect and process relevant evidence. The case is currently stayed pending a decision by the court on the Special Master's report.

o. **In Re Lithium Ion Batteries**, No. 13-MD-2420 (United States District Court for the Central District of California). Tostrud Law Group, P.C., serves as co-counsel representing consumers against Sony, Panasonic, Hitachi, LG Chem, Samsung, and Sanyo

for allegedly conspiring to fix and raise the prices of lithium-ion rechargeable batteries in violation of United States antitrust laws. Plaintiffs allege that as a direct result of defendants' anticompetitive conduct, consumers paid artificially inflated prices for lithium-ion rechargeable batteries.

p. **In Re: Hyundai and Kia Fuel Economy Litigation**, No. MDL 13-2424 (United States District Court for the Central District of California). Tostrud Law Group, P.C., along with co-counsel, represents Hyundai and Kia vehicle owners who allege the defendants misstated fuel-economy figures for certain 2011-2013 vehicles. Plaintiffs allege Hyundai and Kia mislead consumers by advertising their cars' high highway mpg ratings, not the combined number, which was closer to the real-world fuel-economy and much lower than what was advertised.

q. **Grodzitsky v. American Honda Motor Co.**, No. 12-cv-1142 (United States District Court for the State of Nevada). Tostrud Law Group, P.C., serves as co-counsel representing plaintiffs against American Honda for manufacturing and selling vehicles with allegedly defective window mechanisms. The side windows in the subject Honda vehicles move up and down by a device mounted inside the door frame known as a "window regulator." When the window regulator fails, the side window becomes inoperable and is often permanently stuck in the fully-open, closed, or partially open position, endangering occupants. Tostrud Law Group is seeking to represent a nationwide class of consumers who purchased or leased certain Honda vehicles that are equipped with the allegedly faulty window regulators.

In addition to the above representative cases, Tostrud Law Group, P.C. is currently prosecuting several other class and/or collective actions, including data breach and privacy cases, product liability and securities fraud class actions, and several antitrust cases against large companies.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
Tostrud Law Group, P.C.
Reported Hours and Lodestar
June 1, 2013 through February 28, 2017

TIME REPORT

NAME	TOTAL HOURS	CURRENT HOURLY RATE	LODESTAR
ATTORNEYS			
Jon Tostrud (P)	4.40	$600	$2,640.00
NON-ATTORNEYS			
Name (PL)	0.00	$	$
Name (LC)	0.00	$	$
TOTAL:	**0.00**		**$2,640.00**

(P) Partner
(OC) Of Counsel
(A) Associate
(PL) Paralegal
(LC) Law Clerk

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

Firm Name: Tostrud Law Group, P.C. **Reporting Period: June 1, 2013 through February 28, 2017**

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Jon A Tostrud (P)	0.90					3.50									4.40	$600.00	$2,640.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**3.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.40**		**$2,640.00**
NON-ATTORNEYS																	
Name (PL)															0.00	$0.00	$0.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**		**$0.00**
GRAND TOTAL:	**0.90**	**0.00**	**0.00**	**0.00**	**0.00**	**3.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**4.40**		**$2,640.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

Tostrud Law Group, P.C.

ATTORNEYS	DATE RANGE	HOURLY RATE
Jon A Tostrud (P)	1/2012 (Firm inception) - Present	$600
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**

EXHIBIT D

(REDACTED)

Tostrud Law Group, P.C.
1925 Century Park East, Suite 2100
Los Angeles, CA 90067

Date	Customer	Activity	Units	Rate	Billable $	Notes
Tostrud, Jon		*None				
7/25/13	AT-Lithium Ion Batteries	Billable Hours	0.3	$600.00	$180.00	Tel. w/atty J. Cuneo re: case strategy and status
7/28/13	AT-Lithium Ion Batteries	Billable Hours	0.3	$600.00	$180.00	Tel. w/JC re:case status, discovery and indictment
7/28/13	AT-Lithium Ion Batteries	Billable Hours	0.3	$600.00	$180.00	Contact [redacted] re:same
4/27/15	AT-Lithium Ion Batteries	Billable Hours	0.7	$600.00	$420.00	Review discovery request to Plaintiff [redacted]
4/27/15	AT-Lithium Ion Batteries	Billable Hours	0.4	$600.00	$240.00	Conference call w/Cuneo re: discovery projects
4/29/15	AT-Lithium Ion Batteries	Billable Hours	0.9	$600.00	$540.00	Contact [redacted] re: discovery responses
5/1/15	AT-Lithium Ion Batteries	Billable Hours	1.5	$600.00	$900.00	Draft and review discovery responses w/client [redacted]
		Tostrud, Jon Total:			$2,640.00	
		Grand Total:			$2,640.00	

EXHIBIT E

EXHIBIT E

In re Lithium Ion Batteries Antitrust Litigation
Tostrud Law Group, P.C.
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Attorney Service	
Litigation Assessment	
Court Fees (Filing, etc.)	
Document Production	
Experts/Consultants	
Federal Express	
Transcripts (Hearing, Deposition, etc.)	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$50.00
Photocopies – Outside	
Postage	
Service of Process	
Supplies	
Telephone/Telecopier	
Travel	$2,543.70
Miscellaneous	
TOTAL:	$2,593.70

EXHIBIT 66

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF E. KIRK WOOD IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF WOOD LAW FIRM, LLC**

I, E. Kirk Wood, declare:

1. I am the managing member of Wood Law Firm, LLC, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Maury Kim Billingsley and as counsel for IPPs throughout the course of this litigation. The background and experience of Wood Law Firm, LLC and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Wood Law Firm, LLC performed the following work: met with class representative and provided representation with updates on the status of the litigation, met with class representative to assist with preparation of discovery responses, and helped prepare class representative for his deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Wood Law Firm, LLC's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Wood Law Firm, LLC during this period of time was 9.1 hours, with a corresponding lodestar based on current rates of $6,370.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Wood Law Firm, LLC.

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

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

8. Wood Law Firm, LLC is not seeking expense reimbursement.

9. I have reviewed the time and expenses reported by Wood Law Firm, LLC in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 23, 2017 at Birmingham, Alabama

/s/ E. Kirk Wood

E. KIRK WOOD

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

FIRM RESUME

E. Kirk Wood - Managing Partner
Wood Law Firm, LLC
P.O. Box 382434; Birmingham, AL 35238
Phone: (205) 612-0243; Fax: 866-747-3905
ekirkwood1@bellsouth.net

EDUCATION:
BS, University of Alabama 1976; MS, Troy University 1984; JD, Cumberland School of Law 1987

LICENSED:
Alabama and Florida Bar

INSTRUCTION:
Adjunct Professor of Law, University of Alabama, 1992

ADMITTED:
Supreme Court of Alabama; Supreme Court of Florida; US District Court for the Northern District of Alabama; US District Court for the Middle District of Alabama; US District Court for the Northern District of Florida; US Court of Appeals for the Eleventh Circuit; US Court of Appeals for the Fourth Circuit

MEMBER:
American Bar Association; Alabama Bar Association; Florida Bar Association; Birmingham Bar Association; Federal Bar Association

RECENT REPRESENTATIVE MULTI DISTRICT AND CLASS LITIGATION MATTERS:
(All of which are now closed):

In re: TJX Retail Security Breach Litigation
In re: Vioxx Products Liability Litigation
In re: Bausch & Lomb Contact Lens Solution Products Liability Litigation (Plaintiffs Steering Committee)
In re: Heparin Products Liability Litigation (Plaintiffs Steering Committee)
In re: Total Body Formula Products Liability Litigation (Co-Lead and Liaison Counsel; Plaintiffs Executive Committee)
In re: Puerto Rico Cabotage Antitrust Litigation (Plaintiffs Steering Committee)
In re: Countrywide Security Breach Litigation (Plaintiffs Steering Committee)
In re: Hydroxycut Marketing and Sales Practices Litigation
In re: Heartland Payment Systems, Inc. Customer Data Security Breach Litigation
Denise Howerton, et al. vs. Cargill, Inc. (Truvia)

CURRENT MULTI DISTRICT AND PUTATIVE CLASS LITIGATION MATTERS:

In re: Pharmacy Benefit Managers Antitrust Litigation;
In re: Zappos.com, Inc., Customer Data Security Breach Litigation;
In re: The Home Depot, Inc., Customer Data Security Breach Litigation;
In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010;
In re: DePuy Orthopaedics, Inc. ASR Hip Implant Products Liability Litigation;
In re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation;
In re: Stryker Rejuvenate and ABG II Hip Implant Products Liability Litigation;
In re: Blue Cross Blue Shield Antitrust Litigation (Plaintiffs Local Facilitating Counsel; Plaintiffs Steering Committee);
In re: Community Health Systems, Inc., Customer Security Data Breach Litigation;
In re: Target Corporation Customer Data Security Breach Litigation;
Angel Aguiar, et al. vs. Mersiant Company and Whole Earth Sweetener Company, LLC (Pure Via)

EXHIBIT B

IN RE: LITHIUM ION BATTERIES INDIRECT
TIME REPORT- MONTHLY

Firm Name: WOOD LAW FIRM, LLC

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	HOURLY RATE	CUMULATIVE HOURS	CUMULATIVE LODESTAR
E. Kirkwood	2.20		3.70						3.20						$700.00	9.10	$6,370.00
															$0.00		
															$0.00		
															$0.00		
SUB-TOTAL																	
NON-ATTORNEYS															$0.00	0.00	0
SUB-TOTAL																	
GRAND TOTAL:																**9.10**	**$6,370.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

WOOD LAW FIRM, LLC

ATTORNEYS	DATE RANGE	HOURLY RATE
E. Kirk Wood	6-29-13 – 10-22-14	$550.00
E. Kirk Wood	3-20-15 – 5-26-15	$600.00
E. Kirk Wood	2-4-16 – 4-12-16	$700.00
–		

NON-ATTORNEYS	DATE RANGE	HOURLY RATE

EXHIBIT D

	IN RE: Lithium ION Batteries Antitrust Litigation						
Date	**Name**	**Title**	**Firm**	**Description of Work**	**Hours**	**Rate**	**Total**
6/29/13	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Conference with Casey Lott	0.2	$550.00	$110.00
7/1/13	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Meeting with [redacted]	0.5	$550.00	$275.00
7/26/13	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of first amended complaint	0.5	$550.00	$275.00
4/8/14	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of second amended complaint	0.5	$550.00	$275.00
10/2/14	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Meeting with client; conference with Casey Lott	0.5	$550.00	$275.00
10/22/14	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review third amended complaint	0.5	$550.00	$275.00
3/20/15	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of discovery	0.5	$600.00	$300.00
5/11/15	E. Kirk Wood	Attorney	Wood Law Firm, LLC	[redacted] Conference with Casey Lott RE discovery	1	$600.00	$600.00
5/26/15	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review additional discovery	0.2	$600.00	$120.00
2/4/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review deposition notice	0.5	$700.00	$350.00
3/8/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review acknowledgement and agreement	0.4	$700.00	$280.00
3/16/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review fourth amended complaint	0.5	$700.00	$350.00
3/18/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review of declaration; conference with Casey Lott	0.3	$700.00	$210.00
3/23/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review [redacted] responses to discovery	0.5	$700.00	$350.00
4/12/16	E. Kirk Wood	Attorney	Wood Law Firm, LLC	Review deposition; conference with Casey Lott	2.5	$700.00	$1,750.00
						TOTAL	$5,795.00
	EXPENSES	**$0.00**					
	ATTORNEY FEES	**$5,795.00**					
	TOTAL	**$5,795.00**					

EXHIBIT 67

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JAMES F. WYATT, III IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF WYATT & BLAKE, LLP**

I, James F. Wyatt, III, declare:

1. I am Partner of Wyatt & Blake, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Kay Tawney and as counsel for IPPs throughout the course of this litigation. The background and experience of Wyatt & Blake, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Wyatt & Blake, LLP performed the following work: investigated claims to be brought on behalf of North Carolina class member; meetings with North Carolina class representative and client; revision of draft pleadings; gathering facts and relevant documents relating to North Carolina class representative's purchases; communications with co-counsel concerning facts relevant to North Carolina class representative and status of litigation; additional meetings with client and communications with co-counsel; preparation of interrogatory responses on behalf of client; and analysis of relevant documents and pleadings.

5. A summary of work performed by Wyatt & Blake, LLP and detailed billing records from June 1, 2013 to February 28, 2017 were submitted with the Declaration of James F. Wyatt, III in Support of Indirect Purchaser Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses on Behalf of Wyatt & Blake, LLP and filed on May 26, 2017. (ECF No. 1813-43. Counsel for Plaintiffs did not and do not seek attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 198).

6. In summary, the total number of hours spent by Wyatt & Blake, LLP since June 1, 2013 was 21.70, with a corresponding lodestar based is $14,210.00.

7. Attached hereto as **Exhibit B** is a summary of the expenses Wyatt & Blake, LLP has incurred from June 1, 2013 to present, plus applicable case filing fees. Wyatt & Blake, LLP expended a total of $264.50 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Wyatt & Blake, LLP on a contingent basis and have not been reimbursed. The expenses reflected in Exhibit B were prepared from expense reports, vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred. I have reviewed the time and expenses reported by Wyatt & Blake, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on April 4, 2019 at Charlotte, North Carolina.

/s/ James F. Wyatt, III

James F. Wyatt, III

ECF ATTESTATION

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

By: */s/ Steve W. Berman*
Steve W. Berman

EXHIBIT A

EXHIBIT A

WYATT & BLAKE, LLP

Please see our website at www.wyattandblakelaw.com. James F. Wyatt, III is a member of the International Academy of Trial Lawyers, American College of Trial Lawyers, is listed in Best Lawyers in America and Martindale Hubbell's list of Pre-Eminent Lawyers.

Regarding class action cases, Wyatt & Blake, LLP has represented numerous plaintiffs in class action litigation filed in both federal and state courts. For example, in Nicholson v. F. Hoffman-Laroche, Ltd., Wyatt & Blake was co-counsel for a class of plaintiffs suing vitamin manufacturers. A class action settlement of more than $225 million was achieved in this case on behalf of the plaintiff class. Wyatt & Blake also served as counsel for the North Carolina class representative for liquid crystal display (LCD) products. A nationwide settlement of approximately $1.1 billion was achieved in that case. It is believed to be the largest antitrust indirect purchaser class action settlement in the United States. Wyatt & Blake currently represents a number of other North Carolina class representatives in pending class action litigation.

EXHIBIT B

EXHIBIT B

In re Lithium Ion Batteries Antitrust Litigation
WYATT & BLAKE, LLP
Reported Expenses Incurred on Behalf of IPPs

EXPENSE REPORT

CATEGORY	AMOUNT INCURRED
Litigation Assessment	
Court Fees (Filing, etc.)	
Experts/Consultants	
Online document database	$257.70
Federal Express	
Hearing Transcripts	
Investigation	
Lexis/Westlaw	
Messenger/Delivery	
Photocopies – In House (capped at $0.20 per copy)	$6.80
Photocopies – Outside	
Postage	
Service of Process	
Special Supplies	
Telephone/Telecopier	
Travel	
Miscellaneous	
TOTAL:	**$264.50**

EXHIBIT 68

Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE: LITHIUM ION BATTERIES ANTITRUST LITIGATION	Case No. 13-MD-02420 YGR (DMR) MDL NO. 2420
This Document Relates to: **ALL INDIRECT PURCHASER ACTIONS**	**DECLARATION OF JAMES F. WYATT, III IN SUPPORT OF INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES ON BEHALF OF WYATT & BLAKE, LLP**

I, James F. Wyatt, III, declare:

1. I am a Partner of Wyatt & Blake, LLP, Counsel for Indirect Purchaser Plaintiffs ("IPPs" or "Plaintiffs") in this action. I submit this declaration in support of IPPs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses. I make this declaration based on my personal knowledge and if called as a witness, I could and would competently testify to the matters stated herein.

2. My firm has served as counsel to Kay Tawney and as counsel for IPPs throughout the course of this litigation. The background and experience of Wyatt & Blake, LLP and its attorneys are summarized in the curriculum vitae attached hereto as **Exhibit A**.

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

4. During the pendency of the litigation, Wyatt & Blake, LLP performed the following work: investigated facts and claims to be brought on behalf of North Carolina class representative; meetings with North Carolina class representative and client, Kay Tawney; analysis of complaint; gathering facts and relevant documents relating to North Carolina class representative's purchases; communications with co-counsel concerning facts relevant to North Carolina class representative and status of litigation; meetings with Kay Tawney and communications with co-counsel regarding preparation of discovery responses on behalf of Kay Tawney; analysis of relevant discovery documents; meetings with Kay Tawney regarding qualifying purchases; and preparation of Kay Tawney for her deposition.

5. Attached hereto as **Exhibit B** is a billing summary of Wyatt & Blake, LLP's total hours and lodestar, computed at current billing rates, from June 1, 2013 to February 28, 2017. Counsel for Plaintiffs are not seeking attorneys' fees for any time billed prior to the appointment of lead counsel. *See* Order dated May 17, 2013 (ECF No. 194). The total number of hours spent by Wyatt & Blake, LLP during this period of time was 21.70, with a corresponding lodestar based

on current rates of $14,210.00. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel, and was performed by professional staff at my law firm. This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by Wyatt & Blake, LLP.

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

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

8. Attached hereto as **Exhibit E** is a summary of the expenses Wyatt & Blake, LLP has incurred during the course of this litigation. Wyatt & Blake, LLP expended a total of $9.20 in unreimbursed costs and expenses in connection with the prosecution of this case. These expenses were incurred on behalf of IPPs by Wyatt & Blake, LLP on a contingent basis and have not been reimbursed. The expenses reflected in **Exhibit E** were prepared from expense vouchers, receipts, and bank records, and thus represent an accurate recordation of the expenses incurred.

9. I have reviewed the time and expenses reported by Wyatt & Blake, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

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

Executed on May 24, 2017 at Charlotte, North Carolina.

/s/ James F. Wyatt, III

James F. Wyatt, III

ATTESTATION

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

By: */s/ Steven N. Williams*

Steven N. Williams

EXHIBIT A

EXHIBIT A

WYATT & BLAKE, LLP

Please see our website at www.wyattandblakelaw.com. James F. Wyatt, III is a member of the International Academy of Trial Lawyers, American College of Trial Lawyers, is listed in Best Lawyers in America and Martindale Hubbell's list of Pre-Eminent Lawyers.

Regarding class action cases, Wyatt & Blake, LLP has represented numerous plaintiffs in class action litigation filed in both federal and state courts. For example, in Nicholson v. F. Hoffman-Laroche, Ltd., Wyatt & Blake was co-counsel for a class of plaintiffs suing vitamin manufacturers. A class action settlement of more than $225 million was achieved in this case on behalf of the plaintiff class. Wyatt & Blake also served as counsel for the North Carolina class representative for liquid crystal display (LCD) products. A nationwide settlement of approximately $1.1 billion was achieved in that case. It is believed to be the largest antitrust indirect purchaser class action settlement in the United States. Wyatt & Blake currently represents a number of other North Carolina class representatives in pending class action litigation.

EXHIBIT B

EXHIBIT B

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

Firm Name: Wyatt & Blake, LLP

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

Categories:

(1) Investigations, Factual Research
(2) Drafting Discovery Requests
(3) Drafting Discovery Answers/Responses
(4) Deposition Taking
(5) Deposition Defending
(6) Discovery Meet & Confer
(7) Document Review
(8) Drafting Pleadings, Briefs & Pretrial Motions
(9) Reading/Reviewing Pleadings, Briefs, Discovery, Transcripts, etc.
(10) Class Certification/Experts
(11) Litigation Strategy, Analysis & Case Management
(12) Negotiating Settlements
(13) Trial and Trial Preparation
(14) Court Appearance and Prep

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

ATTORNEYS	1	2	3	4	5	6	7	8	9	10	11	12	13	14	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
James F. Wyatt, III (P)	0.70	0.30	8.70		5.60				3.40		0.40				19.10	$700.00	$13,370.00
Robert A. Blake, Jr. (P)			1.00												1.00	$600.00	$600.00
Name (P)															0.00	$0.00	$0.00
Name (OC)															0.00	$0.00	$0.00
Name (A)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.70**	**0.30**	**9.70**	**0.00**	**5.60**	**0.00**	**0.00**	**0.00**	**3.40**	**0.00**	**0.40**	**0.00**	**0.00**	**0.00**	**20.10**		**$13,970.00**
NON-ATTORNEYS																	
Ginny Wooten (PL)			1.60												1.60	$150.00	$240.00
Name (LC)															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
															0.00	$0.00	$0.00
SUB-TOTAL	**0.00**	**0.00**	**1.60**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.60**		**$240.00**
GRAND TOTAL:	**0.70**	**0.30**	**11.30**	**0.00**	**5.60**	**0.00**	**0.00**	**0.00**	**3.40**	**0.00**	**0.40**	**0.00**	**0.00**	**0.00**	**21.70**		**$14,210.00**

EXHIBIT C

EXHIBIT C

In re Lithium Ion Batteries Antitrust Litigation

WYATT & BLAKE, LLP

ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
James F. Wyatt, III	June 1, 2013 – current	$700.00
Robert A. Blake, Jr.	June 1, 2013 – current	$600.00
_		
NON-ATTORNEYS	**DATE RANGE**	**HOURLY RATE**
Ginny Wooten	June 1, 2013 – current	$150.00

EXHIBIT D

(REDACTED)

EXHIBIT D

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP				
PERIOD: July 2013					
Date	**Timekeeper**	**Narrative**		**Task Code**	**Hours**
7/2/2013	James F. Wyatt, III (P)	[redacted]		9	3.0
7/2/2013	James F. Wyatt, III (P)	Communications with co-counsel concerning draft complaint and allegations related to NC and [redacted]		9	0.4
7/2/2013	James F. Wyatt, III (P)	[redacted]		1	0.3
TOTAL					3.7

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP				
PERIOD: September 2013					
Date	Timekeeper	Narrative		Task Code	Hours
9/10/2013	James F. Wyatt, III (P)				
		[redacted]		11	0.4
TOTAL					0.4

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP				
PERIOD: September 2014					
Date	Timekeeper	Narrative		Task Code	Hours
9/30/2014	Robert Blake (P)	[redacted]		3	1.0
TOTAL					1.0
9/29/2014	Ginny Wooten (PL)	[redacted]		3	0.3
TOTAL					0.3

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP
PERIOD: April 2015	

Date	Timekeeper	Narrative		Task Code	Hours
4/24/2015	James F. Wyatt, III (P)	[redacted]		3	0.6
4/24/2015	James F. Wyatt, III (P)	[redacted]		3	0.3
4/27/2015	James F. Wyatt, III (P)	Analysis of [redacted] purchase information and documents		3	0.4
4/27/2015	James F. Wyatt, III (P)	[redacted]		3	0.4
4/27/2015	James F. Wyatt, III (P)	Conference call with [redacted] and co-counsel concerning discovery responses and additional information needed		3	0.8
4/27/2015	James F. Wyatt, III (P)	Communications with [redacted] concerning discovery requests and additional information needed		3	0.3
4/28/2015	James F. Wyatt, III (P)	Communications with [redacted] and co-counsel concerning additional documents needed to respond to discovery requests; review and analysis of documents provided by [redacted]		3	0.8
4/28/2015	James F. Wyatt, III (P)	Analysis of discovery requests and responses to ensure complete responsiveness of information and documents provided to co-counsel		3	0.6
TOTAL					**4.2**
4/24/2015	Ginny Wooten (PL)	[redacted]		3	0.2
4/30/2015	Ginny Wooten (PL)	[redacted]		3	0.4
TOTAL					**0.6**

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP
PERIOD: May 2015	

Date	Timekeeper	Narrative		Task Code	Hours
5/6/2015	James F. Wyatt, III (P)	Communications with [redacted] and co-counsel regarding discovery responses		3	0.3
5/6/2015	James F. Wyatt, III (P)	Analysis of draft discovery responses for [redacted] and supporting documents		3	1.0
5/11/2015	James F. Wyatt, III (P)	[redacted]		3	0.7
TOTAL					**2.0**
5/4/2015	Ginny Wooten (PL)	Communications with [redacted] and J. Wyatt regarding discovery responses		3	0.4
5/11/2015	Ginny Wooten (PL)	Meeting with J. Wyatt and [redacted] regarding finalizing discovery responses and verification		3	0.3
TOTAL					**0.7**

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP			
PERIOD: September 2015				
Date	**Timekeeper**	**Narrative**	**Category**	**Hours**
9/15/2015	James F. Wyatt, III (P)	Communications with co-counse[redacted] regarding discovery responses	3	0.8
9/18/2015	James F. Wyatt, III (P)	Meeting[redacted] to update her on litigation status and discovery issues and requests from Toshiba	1	0.4
9/18/2015	James F. Wyatt, III (P)	Conference[redacted] and co-counsel concerning responses to Toshiba discovery requests and[redacted]	2	0.3
TOTAL				1.5

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP				
PERIOD: November 2015					
Date	Timekeeper	Narrative		Task Code	Hours
11/5/2015	James F. Wyatt, III	Analysis of second set of interrogatory answers [redacted]		3	0.4
TOTAL					0.4

IN RE LITHIUM ION BATTERY LITIGATION

FIRM:	Wyatt & Blake, LLP
PERIOD: March 2016	

Date	Timekeeper	Narrative		Task Code	Hours
3/9/2016	James F. Wyatt, III (P)	Communications with [redacted] and co-counsel re documents produced by K. Tawney in discovery and whether additional documents exist that relate to business vs personal use and tax deductions		3	0.5
3/10/2016	James F. Wyatt, III (P)	Communications with [redacted] and co-counsel re scheduling client deposition as class representative		5	0.3
3/10/2016	James F. Wyatt, III (P)	Analysis of [redacted] purchases of lithium ion products and communications with her regarding additional qualifying purchases		3	0.8
3/10/2016	James F. Wyatt, III (P)	Communications with [redacted] regarding scheduling of deposition as class representative and preparation sessions		5	0.3
3/10/2016	James F. Wyatt, III (P)	Analysis of [redacted] discovery responses in order to evaluate qualifying purchases and to prepare client for deposition		5	0.7
3/10/2016	James F. Wyatt, III (P)	Analysis of amended complaint and discovery responses in order to prepare [redacted] for deposition as class representative		5	1.4
3/11/2016	James F. Wyatt, III (P)	Analysis of interrogatory answers in order to prepare for deposition of [redacted] as class representative		5	0.7
3/11/2016	James F. Wyatt, III (P)	[redacted]		5	1.8
3/11/2016	James F. Wyatt, III (P)	[redacted]		5	0.2
3/14/2016	James F. Wyatt, III (P)	Communications with co-counsel re [redacted] information about qualifying purchases and the search for documents conducted by her		5	0.2
TOTAL					6.9

EXHIBIT E

EXHIBIT E
In re: Lithium Ion Batteries Antitrust Litigation

Firm Name: Wyatt & Blake, LLP
Reporting Period: June 1, 2013 through February 28, 2017

Disbursement	Amount
Litigation Fund Contribution	
Electronic Research	$2.80
Filing / Misc. Fees	
Overnight Delivery/Messengers	
Photocopying (57 x .10)	$6.40
Postage	
Service of Process Fees	
Telephone / Fax	
Transportation / Meals / Lodging	
Co-Counsel Fees	
Expert Fees	
Secretarial OT / Word Processing	
Court Reporter Service/Transcript Fees	
Microfilm / Video / Disks Duplication	
TOTAL	**$9.20**