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Interim Co-Lead Counsel for Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE LITHIUM ION BATTERIES
ANTITRUST LITIGATION**

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

MDL No. 2420

This Document Relates to:

**ALL INDIRECT PURCHASER
ACTIONS**

**DECLARATION OF ERIC SCHACHTER RE
DISSEMINATION OF NOTICE OF SONY
SETTLEMENT AND REQUESTS FOR
EXCLUSION**

**DECLARATION OF ERIC SCHACHTER RE DISSEMINATION OF NOTICE OF SONY
SETTLEMENT AND REQUESTS FOR EXCLUSION; CASE NO. 13-MD-02420-YGR (DMR)**

I, Eric Schachter, declare as follows:

1. I am a Vice President of A.B. Data, Ltd.'s Class Action Administration Company ("A.B. Data"), whose principal offices are in Milwaukee, Wisconsin.

2. I submit this Declaration in connection with the class action notice administration proceedings related to the above-captioned action (the "Action") per the terms of this Court's Order Granting Settlement Class Certification and Preliminary Approval of Class Action Settlement With Sony Defendants dated May 26, 2016 (the "Preliminary Approval Order"). ECF No. 1292. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

3. This Declaration details the steps that were taken to implement notice of the class settlement per the terms of the Preliminary Approval Order, which steps include the following:

- a. Publishing notice via print and digital media;
- b. Establishing a case-specific website for the Settlement at www.batteriesconsumerlitigation.com;
- c. Sending the Long-Form Notice via electronic mail to potential members of the Settlement Classes; and
- d. Disseminating a news release via PR Newswire to announce the proposed Settlement.

PUBLICATION OF THE SHORT-FORM NOTICE

4. Pursuant to the Preliminary Approval Order, A.B. Data submitted the Short-Form Notice to the periodicals indicated in the table below for publication on the dates noted:

Publication	Publication Date
<i>Better Homes and Gardens</i>	July 15, 2016
<i>Parade</i>	July 24, 2016
<i>People</i>	August 5, 2016

Proofs of each of these publications are attached as portions of Exhibit A.

1 5. Beginning on July 15, 2016, A.B. Data coordinated internet “banner” ads to
2 appear on popular websites through August 18, 2016. When clicked, the banners directed
3 potential members of the Settlement Classes to the case-specific website described below. A
4 sample internet banner is attached to this Declaration as part of Exhibit B. Over 273 million
5 banner views (or digital impressions) were generated from Facebook, People.com, Yahoo!, and
6 Google Networks.

7 **CREATION AND MAINTENANCE OF THE SETTLEMENT WEBSITE**

8 6. On May 27, 2016, A.B. Data established the
9 www.batteriesconsumerlitigation.com case-specific website for this Action (the “Website”) and
10 posted the Long-Form Notice for viewing and download on the Website. The Website provides
11 general information about the Settlement and also allows visitors to view and download the
12 Amended Class Action Complaint for the Action, the Settlement Agreement, the Preliminary
13 Approval Order, the Motion for Reimbursement of Certain Expenses, the Declaration of Steven
14 Williams in Support of Indirect Purchaser Plaintiffs’ Motion for Reimbursement of Certain
15 Expenses, Exhibit 1 to the Declaration of Steven Williams in Support of Indirect Purchaser
16 Plaintiffs’ Motion for Reimbursement of Certain Expenses, and the [Proposed] Order Granting
17 Motion for Reimbursement of Certain Expenses.

18 7. The Website also allows potential members of the Settlement Classes to register
19 with the Notice Administrator by providing their names, email addresses, and mailing
20 addresses in order to receive additional notices and updates about the Settlement. As of the date
21 of this Declaration, there have been 41,208 such registrations made via the Website.

22 **TELEPHONE HOTLINE**

23 8. On May 27, 2016, A.B. Data established a case-specific toll-free number, 1-800-
24 952-0581, with an interactive voice response (“IVR”) system and live operators. The
25 automated attendant answers calls and presents callers with a series of choices in response to
26 basic questions. If callers require further assistance, they have the option of transferring their
27 calls to a live operator during business hours.

DISSEMINATION OF DIRECT EMAIL NOTICE

9. Pursuant to the Preliminary Approval Order, A.B. Data was responsible for sending the Long-Form Notice via electronic mail to email addresses that can be reasonably obtained. Beginning on July 7, 2016, A.B. Data caused the Long-Form Notice to be sent via electronic mail to the email addresses provided by the entities listed below:

Entity	Number of Email Addresses
Dell	9,002,002
Hewlett Packard	4,477,405
Fry's Electronics	136,390
Settlement Class Counsel	13
Newegg	2,225,053
TOTAL	15,840,863

DISSEMINATION OF NEWS RELEASE

10. Pursuant to the Preliminary Approval Order, A.B. Data, on July 18, 2016, disseminated, via PR Newswire, a nationwide news release announcing the proposed Settlement. Proof of this dissemination is attached as part of Exhibit C.

REPORT ON REQUESTS FOR EXCLUSION

11. Pursuant to the Preliminary Approval Order, each member of the Settlement Classes has the right to be excluded from the Settlement Classes by mailing a request for exclusion to A.B. Data by no later than September 22, 2016. As of September 29, 2016, A.B. Data has received seventeen (18) requests for exclusion from the Settlement Class. A report listing the requests for exclusion received to date is attached hereto as Exhibit D.

12. A.B. Data agreed to be the Notice and Claims Administrator in this Action in exchange for payment of its fees and expenses. Pursuant to the Sony Settlement, Notice and Administrative Costs of up to \$750,000 were authorized to be paid out of the Gross Settlement Fund. As of September 29, 2016, A.B. Data has incurred \$691,799.97 in notice costs, and has received payment for these costs from the Gross Settlement Fund.

1
2 I declare under penalty of perjury under the laws of the United States that the foregoing
3 is true and correct. Executed this 29th day of September, 2016 in Milwaukee, Wisconsin.
4

5 /s/Eric Schachter
6 Eric Schachter
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EXHIBIT A

Better Homes and Gardens

**If You Bought a Lithium Ion Battery or Electronics
Such as Notebook Computers, Mobile Phones,
and/or Other Items Containing a Lithium Ion
Battery Since 2000**

**You Could Get Money From a \$19.5 Million
Settlement**

Sony Corporation, Sony Energy Devices Corporation, and Sony Electronics Inc. ("Settling Defendants") have agreed to a Settlement resolving claims that they allegedly fixed the price of Lithium Ion Battery Cells. This may have caused individuals and businesses to pay more for Lithium Ion Batteries and Lithium Ion Battery Products. Lithium Ion Battery Products include, but are not limited to, laptop computers, notebook computers, netbook computers, tablet computers, mobile phones, digital cameras, camcorders, and power tools.

Am I Included?

You may be included if, from January 1, 2000, to May 31, 2011, you indirectly purchased a Lithium Ion Battery or Lithium Ion Battery Product (such as a notebook computer, mobile phone, or digital camera) in the United States for your own use and not for resale from one or more of the Defendants in this lawsuit. "Indirectly" means you bought the product from someone other than the manufacturer, such as from a retail store. A more detailed notice, including the exact Class definition and exceptions to Class membership, is available at www.batteriesconsumerlitigation.com.

What does the Settlement provide?

The Settlement provides for the payment of \$19,500,000 in cash to the Class. Sony has also agreed to cooperate in the pursuit of claims against other defendants.

How can I get a payment?

Money will not be distributed to the Class at this time. The lawyers for the Class will pursue the lawsuit against the other Defendants to see if any future settlements or judgments can be obtained in the case and then be distributed together, on a *pro rata* basis, based on the value of your Lithium Ion Battery and/or Lithium Ion Battery Product purchases, to reduce expenses.

If you want to receive notice about the claims process or future settlements, you should register at www.batteriesconsumerlitigation.com.

What are my rights?

Even if you do nothing, you will be bound by the Court's decisions concerning this Settlement. If you want to keep your right to sue the Settling Defendants regarding Lithium Ion Battery and/or Lithium Ion Battery Product purchases, you must exclude yourself in writing from the Class by September 22, 2016. If you stay in the Class, you may object in writing to the Settlement by September 22, 2016. The Settlement Agreement, along with details on how to exclude yourself or object, is available at www.batteriesconsumerlitigation.com. The U.S. District Court for the Northern District of California will hold a hearing on November 8, 2016, at 2:00 p.m., at 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612 to consider whether to approve the Settlement. Class Counsel will also request at the hearing, or at a later date, attorneys' fees of up to 30% of the Settlement Fund, plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the settlement. You or your own lawyer may appear and speak at the hearing at your own expense, but you don't have to. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the website for additional information. Please do not contact the Court about this case.

If the case against the other Defendants is not dismissed or settled, Class Counsel will have to prove their claims against the other Defendants at trial. Dates for the trial have not yet been set. The Court has appointed the law firms of Cotchett, Pitre & McCarthy, LLP; Liefert Cabraser Heimann & Bernstein, LLP; and Hagens Berman Sobol Shapiro LLP as Class Counsel, to represent Indirect Purchaser Class members.

**For More Information: 1-800-952-0581
www.batteriesconsumerlitigation.com**

Better homes & Gardens



ZUCCHINI-OLIVE OIL CAKE

HANDS-ON TIME 30 min.

TOTAL TIME 2 hr.

2½ cups coarsely shredded unpeeled
zucchini (1 large)

2⅓ cups sugar

¾ cup Arbequina olive oil or other
extra-virgin olive oil

4 eggs

¾ cup unsweetened vanilla
almond milk

2 tsp. vanilla

4 cups cake flour

2½ tsp. baking powder

1 recipe Cream Cheese Frosting, *right*
Fresh figs and olive leaves (optional)

1. Preheat oven to 350°F. Grease and flour three 8-inch round baking pans; set aside. Spread shredded zucchini on a plate. Blot dry with paper towels.

2. In a large mixing bowl whisk together sugar and oil. Add eggs, almond milk, and vanilla; whisk to combine. Add flour, baking powder, and 1 tsp. *kosher salt*; whisk to combine. Stir in zucchini. Pour into prepared pans (2 cups per pan). Bake 30 minutes or until a toothpick inserted near center comes out clean. Cool in pans on wire rack 10 minutes. Remove from pans and cool completely.

3. To assemble, place one cake layer on a serving platter. Frost top lightly with some of the Cream Cheese Frosting. Repeat with cake layers and frosting.

For making desserts, Theo recommends using a mild extra-virgin olive oil, like her Arbequina. Its subtle flavor complements the more delicate vanilla in this Zucchini-Olive Oil Cake.

Frost tops and sides with remaining frosting. Garnish with fresh figs and olive leaves. Makes 16 servings.

Cream Cheese Frosting In bowl beat 4 oz. cream cheese, softened; 2 Tbsp. butter, softened; 2 Tbsp. extra-virgin olive oil; and 1 tsp. vanilla on medium speed until light and fluffy. Gradually beat in 3 cups powdered sugar until spreading consistency. Makes about 2 cups frosting.

EACH SERVING 492 cal, 17 g fat, 57 mg chol, 284 mg sodium, 80 g carb, 1 g fiber, 5 g pro.

RECIPE FROM PAGE 89

CRAVINGS

BURRATA & STONE FRUIT

Burrata is made by forming mozzarella (either buffalo or cow's milk) into a hollow pouch and filling it with a soft, stringy mixture of curd and fresh cream.

TOTAL TIME 15 min.

12 oz. nectarines, plums, peaches, and/or apricots, pitted and sliced
8 oz. burrata cheese, quartered
2 Tbsp. chopped fresh mint
1 Tbsp. hot chili oil or extra-virgin olive oil

Arrange fruit, cheese, and mint on a plate. Drizzle with oil. Makes 4 servings.

EACH SERVING 229 cal, 15 g fat, 40 mg chol, 91 mg sodium, 11 g carb, 2 g fiber, 11 g pro.

Parade

If You Bought a Lithium Ion Battery or Electronics Such as Notebook Computers, Mobile Phones, and/or Other Items Containing a Lithium Ion Battery Since 2000

You Could Get Money From a \$19.5 Million Settlement

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How can I get a payment?

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What are my rights?

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For More Information: 1-800-952-0581
www.batteriesconsumerlitigation.com

Community Table

DECONSTRUCTED



Indian Summer

A lot of people have this misconception that Indian food means heavy curries and complicated procedures," says chef Maneet Chauhan, a judge on Food Network's *Chopped*. As chef-owner of Chauhan Ale & Masala House in Nashville, Chauhan is on a mission to dispel that myth, delighting diners with Indian-spice-infused American dishes like tandoori shrimp and grits, guava-glazed ribs and her spin on Nashville hot chicken. Here, she shares two easy chutney recipes, perfect atop grilled summertime dishes. —Alison Ashton

CILANTRO-MINT CHUTNEY

Combine 1 cup **cilantro** leaves, 1 cup **mint** leaves, ½ cup **mango pulp** (about 1 small mango), ¼ cup **lime juice**, ½ tsp **grated ginger** and 2–3 **serrano chiles** in food processor. Process until smooth. Add **salt** to taste. **Makes 1 cup.**

PAIR WITH
SHRIMP TACOS
GRILLED CHICKEN

PANCH PURAN PEACH CHUTNEY

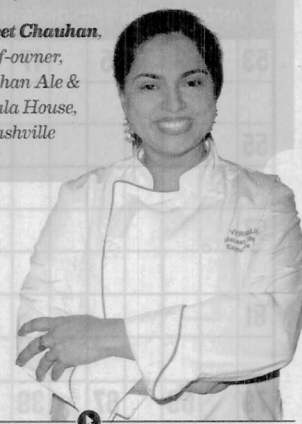
Heat 1 Tbsp **coconut oil** in a medium saucepan over medium-high heat. Add 2 Tbsp **panch puran spice blend**. When spices start to crackle, add 1 lb peeled and chopped fresh **peaches** (or 1 lb frozen peaches, thawed and chopped), ½ cup **brown sugar**, ½ cup **distilled white vinegar** and 1 tsp **cayenne**. Add **salt** to taste. Cook 30 minutes over low heat or until thick. **Makes 1½ cups.**

Panch puran: This Bengali five-spice blend is made with equal parts fennel seed, nigella seed, cumin seed, black mustard seed and fenugreek seed. "It's one of my absolute favorite blends to make chutney," says Chauhan.

Spice Girl

Indian spices can find a place in any cuisine. It's just a matter of opening your mind and palate to new flavors.

—**Maneet Chauhan**,
chef-owner,
Chauhan Ale &
Masala House,
Nashville



Visit Parade.com/chutney for Chauhan's Tamarind-Date Chutney recipe plus her must-have spices.

People

LEGAL NOTICE

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**For More Information: 1-800-952-0581
www.batteriesconsumerlitigation.com**

Homework in backpack, backpack on kid, kid on bus. Gold star.

With everything you need in one shared place,
Cozi schools the details of your day.

- ☒ Shared Family Calendar
- ☒ Shopping & To Do Lists
- ☒ Meals & Recipe Box


COZITM
Life, simplified.

Get Cozi. The #1 family organizing app, available in the App Store.

MAKEUP: JESSICA ARIANE/THE ARTISTS AGENCY; INSET: COURTESY SYED FAMILY

Photographs

Time Inc.

ADVERTISEMENT PLACEMENT CONFIRMATION

Publication: PEOPLE MAGAZINE

Issue Date: 08/15/2016

Circulation: 3,400,000

Ad Size: 1/3rd Page

Page Number: 74



Anthony Mitchell

Associate Finance Manager, Time Inc.



THOMAS J. SCHOPPER
Notary Public, State of New York
No. 01SC6005198
Qualified in New York County
Commission Expires April 6, 2018

EXHIBIT B

\$19.5 MILLION Lithium Ion Battery Settlement



Register here if you purchased products with a lithium ion battery such as laptops, mobile phones, camcorders, digital audio players or power tools.

BatteriesConsumerLitigation.com

Register Here

\$19.5 MILLION Lithium Ion Battery Settlement



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BatteriesConsumerLitigation.com

Register Here

\$19.5 Million Lithium Ion Battery Settlement



BatteriesConsumerLitigation.com

Register Here for Details

Cell Phone, Laptop, Power Tools or Other Devices with Li-Ion Batteries Could Get You Money

\$19.5 Million
Lithium Ion Battery Settlement



BatteriesConsumerLitigation.com

Register Here for Details

Cell Phone, Laptop, Power Tools or Other Devices with Li-Ion Batteries Could Get You Money

\$19.5 MILLION
Lithium Ion Battery Settlement



Register Here if You Purchased Products with a Lithium Ion Battery such as Laptops, Mobile Phones, Camcorders, Digital Audio Players or Power Tools

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\$19.5 MILLION
Lithium Ion Battery Settlement



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\$19.5 MILLION
Lithium Ion Battery Settlement



Register Here

BatteriesConsumerLitigation.com

**Acuerdo de litio ion baterías por
\$19,5 Millones.**



Regístrese aquí si usted compró
productos con una batería de iones de litio
como ordenadores portátiles, teléfonos
móviles, videocámaras, reproductores de
Audio Digital o herramientas eléctricas

BatteriesConsumerLitigation.com

**Acuerdo de litio ion baterías por
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Regístrese Aquí

BatteriesConsumerLitigation.com

EXHIBIT C



(<http://www.prnewswire.com/>)

 PRINT THIS

JUL 18, 2016, 16:00 ET

News provided by

Cotchett, Pitre & McCarthy, LLP; Lieff Cabraser Heimann & Bernstein, LLP;
and Hagens Berman Sobol Shapiro LLP →

(<http://www.prnewswire.com/news/cotchett%2C+pitre+%27and%27+mccarthy%2C+llp%3B+lieff+cabraser+heimann+%27and%27+bernstein%2C+llp%3B+and+hagens+berman+sobol+shapiro+llp>)



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If You Bought a Lithium Ion Battery or Electronics Such as Notebook Computers, Mobile Phones, and/or Other Items Containing a Lithium Ion Battery Since 2000 You Could Get Money From a \$19.5 Million Settlement

Class action settlement announced by Cotchett, Pitre & McCarthy, LLP, Lieff Cabraser Heimann & Bernstein, LLP, and Hagens Berman Sobol Shapiro LLP

<j

SAN FRANCISCO, July 18, 2016 /PRNewswire/ -- A \$19.5 million class action

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If you want to receive notice about the claims process or future settlements, you should register at www.batteriesconsumerlitigation.com. (<http://www.batteriesconsumerlitigation.com/>)

What are my rights?

Even if you do nothing, you will be bound by the Court's decisions concerning this Settlement. If you want to keep your right to sue the Settling Defendants regarding Lithium Ion Battery and/or Lithium Ion Battery Product purchases, you must exclude yourself in writing from the Class by September 22, 2016. If you stay in the Class, you may object in writing to the Settlement by September 22, 2016. The Settlement Agreement, along with details on how to exclude yourself or object, is available at www.batteriesconsumerlitigation.com (file:///dsd-fileserver2/home/lyoung/2016%20Cases/Lithium%20Ion%20Batteries/Print%20Production/www.batteriesconsumerlitigation.com). The U.S. District Court for the Northern District of California will hold a hearing on November 8, 2016, at 2:00 p.m., at 1301 Clay Street, Courtroom 1, 4th Floor, Oakland, CA 94612 to consider whether to approve the Settlement. Class Counsel will also request at the hearing, or at a later date, attorneys' fees of up to 30% of the Settlement Fund, plus reimbursement of costs and expenses, for investigating the facts, litigating the case, and negotiating the settlement. You or your own lawyer may appear and speak at the hearing at your own expense, but you don't have to. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check the website for additional information. Please do not contact the Court about this case.

If the case against the other Defendants is not dismissed or settled, Class Counsel will have to prove their claims against the other Defendants at trial. Dates for the trial have not yet been set. The Court has appointed the law firms of Cotchett, Pitre & McCarthy, LLP; Lieff Cabraser Heimann & Bernstein, LLP; and Hagens Berman Sobol Shapiro LLP as Class Counsel, to represent Indirect Purchaser Class members.

For More Information: 1-800-952-0581 / www.batteriesconsumerlitigation.com
(file:///dsd-fileserver2/home/lyoung/2016%20Cases/Lithium%20Ion%20Batteries/Print%20Production/www.batteriesconsumerlitigation.com)

Contact: Steven N. Williams

	650-697-6000
	SWilliams@cpmlegal.com (http://www.prnewswire.com/news-releases/mailto:SWilliams@cpmlegal.com)

To view the original version on PR Newswire, visit:<http://www.prnewswire.com/news-releases/if-you-bought-a-lithium-ion-battery-or-electronics-such-as-notebook-computers-mobile-phones-andor-other-items-containing-a-lithium-ion-battery-since-2000-you-could-get-money-from-a-195-million-settlement-300299992.html>
(<http://www.prnewswire.com/news-releases/if-you-bought-a-lithium-ion-battery-or-electronics-such-as-notebook-computers-mobile-phones-andor-other-items-containing-a-lithium-ion-battery-since-2000-you-could-get-money-from-a-195-million-settlement-300299992.html>)

SOURCE Cotchett, Pitre & McCarthy, LLP; Lieff Cabraser Heimann & Bernstein, LLP;
and Hagens Berman Sobol Shapiro LLP

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☐ Check the box to include the list of links referenced in the article.

EXHIBIT D

Lithium Ion Batteries Antitrust Litigation
Exclusion Report

	<u>Name</u>	<u>Exclusion ID #</u>	<u>Postmark Date</u>
1	Allen E Reel	37398659	7/19/2016
2	Michael Tkacik	37398660	7/21/2016
3	Sharyn De Berry	37398661	7/21/2016
4	David Rosicke	37398662	7/28/2016
5	Gerald L. Curd, Nola Sue Curd	37398663	8/11/2016
6	TracFone Wireless, Inc	37398664	8/22/2016
7	Bradford k Wolfenden II	37398665	8/22/2016
8	Michael F. Moore	37398666	8/23/2016
9	Acer, Inc.	37398668-1	9/7/2016
10	Acer America Corporation	37398668-2	9/7/2016
11	Gateway, Inc.	37398668-3	9/7/2016
12	Gateway U.S. Retail, Inc (f/k/a eMachines, Inc)	37398668-4	9/7/2016
13	Packard Bell B.V.	37398668-5	9/7/2016
14	William King	37398667	9/7/2016
15	Cathy Kayrouz	37398669	9/18/2016
16	Glen Greene	37398670	9/20/2016
17	HP Inc.	37398671	9/19/2016
18	Home Depot	37398672	9/19/2016